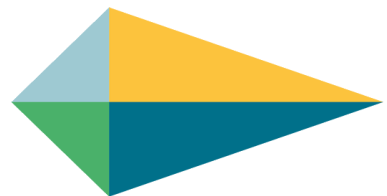


East Suffolk Council - Waveney Local Plan

Statutory 5 year Review Assessment

2025 Addendum

March 2025



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The East Suffolk Council - Waveney Local Plan¹ was adopted on 20th March 2019. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 introduced in 2017, states that local planning authorities must review their plans within five years from the date of adoption. Review in this context means an assessment to determine whether updates to the plan are necessary. The review assessment of the Waveney Local Plan was agreed by Cabinet on 5th March 2024, and concluded that an update was not required. The assessment is published on the Council's website².

2025 Update:

Regulation 10A(1) of the above Regulations requires the review of specified local development documents within stated time periods and Regulation 10A(1)(a) requires a review of a local development document which is a local plan to be completed "every five years starting from the date of adoption of the local plan". The legislation does not preclude a whole or partial review of a local plan from taking place within a lesser time frame³.

This update was undertaken following the introduction of a new standard method for assessing local housing need in the revised Planning Practice Guidance for Housing and Economic Needs Assessment published in December 2024 alongside revisions to the National Planning Policy Framework (NPPF). This update solely considers housing need, on the basis of paragraph 34 of the NPPF – "Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." The addendum was agreed by Cabinet on 4th March 2025. The addendum considers this matter only, given that the full review assessment was undertaken relatively recently, that the Council has not identified any other changes of relevant circumstances, and that review assessments of a local plan as a whole are only required every five years. The Council has completed the review assessment using the Planning Advisory Service (PAS) Toolkit Part 1. This addendum should be read alongside the 2024 review assessment.

¹ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf>

² <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Local-Plans/Waveney-Local-Plan-Review-Assessment-March-2024.pdf>

³ Section 12(1) of the Interpretation Act 1978 allows any statutory power or duty to be performed from time to time as occasion requires (unless the contrary intention appears for the particular power or duty). This allows both the timing and the content of any review to be tailored to what the occasion requires, within the overall requirement that the local plan as a whole must be reviewed at least every five years.

PAS Local Plan Route Mapper Toolkit Part 1: Local Plan Review Assessment

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the 'content' requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>2025 Update Changes to the standard methodology for assessing housing need were introduced in December 2024 in an updated PPG on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 1,644 dwellings per year for East Suffolk, as set out in Appendix A. A figure for the Waveney area has not been published however the Council has calculated this as 703 dwellings per year. The introduction of the new standard method affects the conclusions of the 2024 Review Assessment as it represents a significant change in housing need. Therefore, under paragraph 34 of the NPPF, it is concluded that strategic policies relating to housing supply require a review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025, and has also prepared an updated Local Development Scheme (March 2025) alongside this updated assessment.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT:</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 Update</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>		<p>Changes to the standard methodology for assessing housing need were introduced in December 2024, in an updated PPG on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 1,644 dwellings per year for East Suffolk, as set out in Appendix A. A figure for the Waveney area has not been published however the Council has calculated this as 703. The introduction of the new standard method affects the conclusions of the 2024 Review Assessment as it represents a significant change in housing need. Therefore, under paragraph 34 of the NPPF, it is concluded that strategic policies relating to housing supply require a review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025, and has also prepared an updated Local Development Scheme (March 2025) alongside this updated assessment.</p>
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 Update The Housing Land Supply position as at 31.3.2024 was published in November 2024. This sets out a housing land supply of 5.16 years. The December 2024 NPPF re-introduces a requirement to apply a buffer to housing land supply calculations. This alone would reduce the housing land supply to 4.91 years. The housing land supply position will be further affected by the outcome of this assessment, and will need to be assessed against the housing need calculated under the new standard method.</p>
A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery</p>	Agree	<p>2025 Update The 2023 Housing Delivery Test was published in December 2024 and the result for East Suffolk is 103%. There are therefore no consequences for East Suffolk as a result of the 2023 Housing Delivery Test.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.		The change to the standard method and resultant increase in the housing need figure is likely however to impact on future Housing Delivery Test results.
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>		
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT:</p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		
A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>		
A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>2025 update The change to the standard method for assessing housing need and the resultant increase in the housing need figure are not directly relevant to this question.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p><u>If no</u> go to question A16.</p> <p><u>If yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p><u>2025 Decision:</u> Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>The Government introduced a new standard method for assessing housing need in December 2024, through amendments to the Planning Practice Guidance on Housing and Economic Needs Assessment. The housing need calculated under the new standard method equates to 1,644 dwellings per year for East Suffolk, 703 for the Waveney Local Plan area, as set out in Appendix A. The introduction of the new standard method affects the conclusions of the 2024 Review Assessment as it represents a significant change in housing need. Therefore under paragraph 34 of the NPPF, it is</p>		

	concluded that strategic policies relating to housing supply require review. The Council has committed to preparing an East Suffolk Local Plan, beginning in 2025, and has prepared an updated Local Development Scheme ⁴ (March 2025) alongside this updated assessment.		
	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	Yes	The Local Development Scheme (March 2025) proposes a full Local Plan review.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	Yes	The Local Development Scheme (March 2025) proposes a full Local Plan review.
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	Yes	The Local Development Scheme (March 2025) proposes a full Local Plan review.
	You have answered yes to one or more questions above.	Yes	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above	N/A	If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
B4	Decision: Full Update of Plan Policies Reasons for scope of review:		

⁴ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/statement-of-community-involvement-and-local-development-scheme/>

	The Local Development Scheme (March 2025) proposes a full Local Plan review. The housing need assessed under the revised standard method will require a significant uplift in the amount of housing planned for, which is a fundamental part of the Local Plan strategy.
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Date of assessment:	February 2025
Assessed by:	Planning Policy and Delivery Team
Checked by:	Andrea McMillan – Planning Manager (Policy, Delivery and Specialist Services)
Comments:	

Appendix A – Housing need calculated under the Standard Method

The table below sets out the calculation of local housing need using the current standard methodology as set out in the Planning Practice Guidance on housing and economic needs assessments⁵. The calculation of local housing need using the previous standard method was set out in appendix B of the Waveney Local Plan Review Assessment 2024.

The calculation set out in the Planning Practice Guidance is as follows:

Step 1 - Set the baseline – The baseline is 0.8% of the existing housing stock for the area using the most recent data published at the time.

Step 2 – Adjustment to take account of affordability – use the median workplace-based affordability ratios published by the ONS, using the formula below

$$\text{Adjustment factor} = \left(\frac{\text{five year average affordability ratio} - 5}{5} \right) \times 0.95 + 1$$

Waveney Local Plan area

Housing Stock	0.8% of housing stock	Affordability Ratio ⁶	Affordability Adjustment	Standard Method Housing Need
57,925 (see table below)	463	7.716	1.51604	703

Year	2019 (last published)	2019/20	20/21	21/22	22/23	23/24	Current Housing stock
Housing Stock or completions	56,561	156	201	323	360	324	57,925

⁵ www.gov.uk/guidance/housing-and-economic-development-needs-assessments

⁶ www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningsforformerlocalauthorities

East Suffolk as a whole

Housing Stock	0.8% of housing stock	Affordability Ratio ⁷	Affordability Adjustment	Standard Method Housing Need
122,161	977.288	8.59	1.6821	1,644

⁷ www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian

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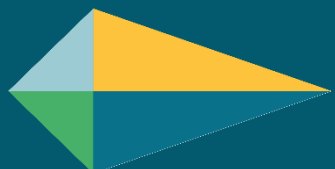
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