

# East Suffolk Interim Housing Position Statement

Produced in response to the December 2024 NPPF and  
alongside the East Suffolk Local Development Scheme  
(LDS) 2025

March 2025



# Introduction

1. This Interim Housing Position Statement sets out East Suffolk Council's position in relation to the consideration of housing land supply and consequential matters in connection with planning applications for housing development. The Statement does not have policy status but provides practical guidance for the assistance of applicants and decision makers for planning permission and other affected parties. All planning applications will continue to be determined in accordance with the relevant policies of the statutory development plan unless material considerations indicate otherwise.
2. East Suffolk Council has two adopted Local Plans – [Suffolk Coastal Local Plan](#) (September 2020) and [Waveney Local Plan](#) (March 2019). Along with 'made' Neighbourhood Plans and [Suffolk County Council's Minerals and Waste Local Plan](#) these form the development plan for the district.
3. The [National Planning Policy Framework](#) (NPPF) is a material consideration in taking decisions on planning applications. The NPPF was updated in December 2024.

Paragraph 231 of the NPPF states for decision making *"The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication."*

4. Changes made in the NPPF relate to the calculation of housing land supply; and alongside the NPPF a new standard method for calculating housing need has also been published in the updated [Planning Practice Guidance on Housing and Economic Needs Assessment](#), and a spreadsheet on '[Indicative local housing need](#)' sets out the current numbers for each local planning authority. For East Suffolk the housing need figure, calculated at February 2025, is 1,644 dwellings (compared to 905 under the former standard method, and 916 total annual requirements in both Local Plans).
5. Both the Suffolk Coastal Local Plan (2020) and Waveney Local Plan (2019) have planned positively to meet their respective housing need. The local plans have created an ambitious strategy that allocated land for more dwellings than their respective housing requirements, and also include policies to support appropriate 'windfall' housing development.
6. Paragraph 78 of the National Planning Policy Framework states that:  
*"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old [39]"*
7. Footnote 39 states *"Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance."*

8. East Suffolk Council meets this requirement through the publication of a [Statement of Housing Land Supply](#) on an annual basis as per paragraph 78. The Statement deals separately with the position in each Local Plan area. Since the adoption of the Local Plans East Suffolk Council has been able to demonstrate at least 5 years supply of deliverable land in its yearly assessments for each Local Plan area. East Suffolk Council last published its Statement of Housing Land Supply in November 2024 which was prior to the latest NPPF and Planning Practice Guidance update.
9. The East Suffolk Statement of Housing Land Supply published in November 2024 shows that, as of 1<sup>st</sup> April 2024:
  - Suffolk Coastal Local Plan area can demonstrate a supply of 6.39 years
  - Waveney Local Plan area can demonstrate a supply of 5.16 years
10. This Interim Housing Position Statement has been drafted to set out how the changes to the NPPF affect the East Suffolk Council housing supply, and the consequences on decision making.

## Suffolk Coastal Local Plan area

11. The Suffolk Coastal Local Plan was adopted on 23<sup>rd</sup> September 2020 and relates to the former Suffolk Coastal district. It was prepared and examined against the February 2019 version of the NPPF and its housing requirement was based on a local housing need calculated under the former standard method (and amounting to 542 dwellings per annum).
12. Paragraph 78 of the NPPF sets out that where strategic policies in a Local Plan are less than five years old, the housing land supply should be based on the requirement in the Local Plan.
13. The Suffolk Coastal Local Plan was adopted on 23<sup>rd</sup> September 2020 and is less than five years old, and the Housing Land Supply can continue to be calculated on the basis of the housing requirement in the Plan until the Plan is five years old on 23<sup>rd</sup> September 2025 unless a review assessment conducted under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 concludes that strategic policies in the Plan need to be updated. If such a Regulation 10A review concludes that strategic policies in the Plan do not need to be updated, the housing requirement in the Plan can continue to be used when assessing the Housing Land Supply after 23<sup>rd</sup> September 2025.
14. At the present time, with the Plan being less than five years old, the requirement for the purposes of paragraph 78 of the NPPF is the housing requirement in the Plan. The Regulation 10A review will be carried out in due course before 23<sup>rd</sup> September 2025. The Housing Land Supply for Suffolk Coastal has, however, been recalculated using the updated policy on calculating supply in the NPPF - the change to the Housing Land Supply calculations in the new NPPF which is relevant to the Suffolk Coastal Local Plan area is the re-introduction of a 5% buffer on the housing requirement (paragraph 78). The revised Housing Land Supply figure is therefore 6.08 years with the calculation detailed below.
15. Housing requirement:
  - a 5 year supply target (5 x 542) 2,710

- b 5% buffer (a x 5%) 136
- c 5% buffer applied 2,846

Number of units and years identified against the requirement:

- a 5 year supply requirement 2,846
- b annual requirement (a / 5) 569
- c total number of units identified 3,461
- d number of units above or below 5 year supply requirement (c-a) 615
- e number of years of deliverable housing land (c / b) 6.08 years

## Waveney Local Plan area

16. The Waveney Local Plan was adopted on 20<sup>th</sup> March 2019 and relates to the former Waveney district (outside of the Broads, for which the Broads Authority is the Local Planning Authority and prepare their own Local Plan). The Waveney Local Plan was prepared and examined against the original March 2012 version of the NPPF and its housing requirement was not derived from the local housing need of the former standard method, but from the [Strategic Housing Market Assessment](#). The housing requirement is 374 dwellings per year.
17. Paragraph 78 of the NPPF states *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.[39]”*  
  
Footnote 39, which covers the outcome of Regulation 10A reviews, has been set out above.
18. The East Suffolk Housing Land Supply Statement published in November 2024 shows that the Waveney Local Plan area has a housing land supply of 5.16 years.
19. The [Waveney Local Plan Review Assessment](#) was undertaken in accordance with regulation 10A of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and published in March 2024, as required by legislation prior to the Local Plan becoming five years old, and concluded that the policies of the Local Plan did not need to be updated. This conclusion was informed by the fact that the housing need calculated under the then standard method had remained similar to the housing requirement in the plan of 374 dwellings per year. The November 2024 Housing Land Supply was therefore calculated based on the Local Plan housing requirement (in line with the applicable guidance in the then operative version of the NPPF (December 2023)).
20. On 12<sup>th</sup> December 2024, the Government published a new standard method for calculating housing need, set out in the Planning Practice Guidance on Housing and Economic Needs Assessment, which increased the East Suffolk housing need figure from 905 dwellings per year to 1,644 dwellings per year. The new standard method does not directly provide

separate local housing need figures for the Waveney Local Plan and Suffolk Coastal Local Plan areas.

21. Paragraph 231 of the NPPF states for decision making *“The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication.”*
22. Paragraph 34 of the National Planning Policy Framework states that *“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary”* and *“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.”*
23. Paragraph 232 of the NPPF states *“Where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78) and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, policies should not be regarded as out-of-date on the basis that the most up to date local housing need figure (calculated using the standard method set out in planning practice guidance) is greater than the housing requirement set out in adopted strategic policies, for a period of five years from the date of the plan’s adoption.”*
24. Despite undertaking a Regulation 10A review in 2024 that found that the plan did not need updating, it is open to the Council to carry out further reviews from time to time as occasion requires before the next five year anniversary arises in 2029. This is authorised by section 12(1) of the Interpretation Act 1978. Paragraph 34 of the NPPF gives guidance on circumstances when an earlier than five yearly review may be required. It is considered that in the Waveney Local Plan area the new standard method creates an increase in housing need to such a significant extent that it would trigger the need for a review of relevant strategic policies relating to housing need and supply in accordance with paragraph 34 of the NPPF. An [update to the 2024 review of the Waveney Local Plan](#) has been produced which concludes that due to the changes to the NPPF and the resultant uplift in housing need the strategic policies relating to housing supply require a review. This will be achieved by the preparation of a district-wide East Suffolk Local Plan, with work commencing in 2025.
25. Therefore, under paragraph 78 of the NPPF, the Housing Land Supply position in the Waveney area would therefore be assessed against the housing need figure calculated under the standard method (to the extent that it is possible to identify a Waveney-specific figure).
26. Paragraph 78 of the NPPF also reintroduced the requirement to add a 5% buffer to the housing requirement. If this buffer of 5% was applied to the latest Housing Land Supply figures without applying the new standard method the Waveney Area would still be unable to demonstrate a 5-year housing land supply albeit it would be close to meeting its supply need. With the 5% applied only, Waveney would be able to demonstrate a supply of 4.91 years.

27. There is no available guidance for determining the exact housing need for the Waveney area due to much of the data being based on East Suffolk as a whole. Therefore, and in accordance with Planning Practice Guidance on Housing and Economic Development Needs Assessment (Paragraph ID: 2a-014-20241212) a suitable alternative approach which has regard to the data available and the guidance on the Planning Practice Guidance has been used. This alternative method uses the data available for the Waveney area and applies the standard method formula to this. Based on the data available the need is an estimated 703 dwellings per year. The calculation has been detailed below and uses our best available data. Should the approach and data sources be clarified the calculation can be updated.

East Suffolk as a whole

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

Waveney Local Plan area disaggregation

Housing Stock	0.8% of housing stock	Affordability Ratio	Affordability Adjustment	Standard Method Housing Need
57,925	463.4	7.716	1.51604	703

The evidence used to determine the Waveney housing need incorporates the latest published housing stock data that was published solely for Waveney which was in 2019.

[https://assets.publishing.service.gov.uk/media/664da823f34f9b5a56adcbf2/LT\\_125.ods](https://assets.publishing.service.gov.uk/media/664da823f34f9b5a56adcbf2/LT_125.ods)

Total housing completions and losses for Waveney for each year have been added to this 2019 figure to ascertain the overall stock for Waveney as shown below.

Year	2019 (last published)	2019/20	2020/21	2021/22	2022/23	2023/24	Current Housing stock
Housing Stock or completions	56,561	156	201	323	360	324	57,925

The affordability ratio for Waveney is not available on the link within the PPG instead an alternative data set from the ONS has been used which is found here:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhouseprice-toworkplacebasedearningsforformerlocalauthorities>

We have used the most recently published figure for each year, some of these figures were published the following year as the figure was updated.

Year	2019	2020	2021	2022	2023	5-year Average
Affordability Ratio	7.03	7.22	7.9	7.91	8.52	7.716

28. Planning Practice Guidance on [Housing Supply and Delivery](#) (paragraph ID 68-031-20190722) states that, “Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure.”
29. The calculation for the Waveney Local Plan 5 Year Housing Land Supply Assessment undertaken in November 2024 had included a shortfall from previous year. However, when applying the new standard method this previous shortfall no longer needs to be applied as the affordability adjustment factor covers previous years shortfall.
30. The housing land supply figure for the Waveney area as at 31.3.2024, on this basis, is updated to 3.33 years as detailed below:

Housing requirement:

- a 5 year supply target (5 x 703) 3,515
- b 5% buffer (a x 5%) 176
- c Total 5-year supply target (a + b) 3,691

Number of units and years identified against the requirement:

- a 5 year supply requirement 3,691
- b annual requirement (a / 5) 738
- c total number of units identified 2,455
- d number of units above or below 5 year supply requirement (c-a) -1,236
- e number of years of deliverable housing land (c / b) 3.33 years

### Five year supply position

31. In light of the published NPPF update and the most recent (March 2025) Regulation 10A review East Suffolk Council is not able to demonstrate a 5-year housing land supply in the Waveney Local Plan area. Paragraph 11(d) of the NPPF, the ‘presumption in favour of sustainable development’, will therefore apply in decision making on planning applications for housing development in the Waveney Local Plan area.
32. As the Suffolk Coastal Local Plan area can demonstrate a five year supply Paragraph 11d does not currently apply in that area.

## Paragraph 11(d) of the NPPF (the tilted balance)

33. East Suffolk Council will apply paragraph 11(d) in decision making within the Waveney Local Plan area. Paragraph 11(d) is detailed below:

*“Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”*

34. The presumption in favour of sustainable development, often referred to as the ‘tilted balance’ means that the Council would apply much greater weight to the contribution to housing supply from sustainable housing proposals. In particular, proposals for housing that are sustainable but that would be contrary to Local Plan policies on housing development may be granted planning permission. Importantly, all planning applications for housing development will continue to be carefully and thoroughly considered against all policies within the development plan and other applicable paragraphs of the NPPF.

### Part i)

35. Paragraph 11(d) part i) sets out that the presumption does not apply where the application of policies in the NPPF that protect areas or assets of particular importance provide a strong reason for refusal. Within this text under footnote 7, the NPPF provides further detail as to what protected areas or assets of particular importance relates to.
36. Footnote 7 states:

*“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal*



*change.”*

37. Applications will be expected to fully comply with all relevant habitat regulation requirements.

Part ii)

38. Under Part ii) of paragraph 11(d) Local Authorities would be expected to refuse applications where any adverse impacts arising from the permission would significantly and demonstrably outweigh the benefits. It then further directs decision makers to have particular regard to certain key policy areas which are; directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
39. Paragraph 11 requires a decision maker to apply a presumption in favour of sustainable development with part 11(d) giving particular regard to sustainable locations. Greater weight will be given to the benefits of proposals that are well related to settlements, services and facilities, particularly the larger towns and market towns that have a higher level of services whilst avoiding isolated and unsustainable locations. For new developments in Rural Areas (as defined under policy WLP1.1) policy WLP7.1 will be of relevance in understanding the sustainability of a settlement.
40. In accordance with Paragraph 115 of the NPPF the provision of sustainable transport opportunities as part of an application will be a consideration in determining the sites overall sustainability. The paragraph includes provisions (amongst other considerations) that sustainable transport modes are prioritised.
41. Paragraph 11(d) also directs decision makers to have particular regard to making effective use of land. Paragraph 129 of the NPPF states:
- “Planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
  - b) local market conditions and viability;*
  - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
  - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
  - e) the importance of securing well-designed, attractive and healthy places.”*
42. Applications will be assessed against paragraph 129 in determining whether the site provides an appropriate density. Schemes that do not make the best use of land by

proposing an unreasonable low-density scheme are unlikely to provide significant benefit when weighed against the adverse impacts.

43. Paragraph 11(d) also directs decision makers to have particular regard to making well-designed places. Paragraph 139 states that developments that are not well designed should be refused whilst developments that reflect local and national design guidance or provide outstanding or innovative design should be approved.

44. Paragraph 135 of the NPPF sets out the criteria for a well-designed scheme that decision makers must apply. The paragraph is detailed below:

*“Planning policies and decisions should ensure that developments:*

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

45. Paragraph 11(d) also directs decision makers to have particular regard to policies on affordable housing and the footnote directs decision makers to paragraph 66 of the NPPF which states:

*“Where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.”*

46. Accordingly, the application of paragraph 11(d) is not expected to reduce the weight applied to affordable housing in determining planning applications.

### Other considerations

47. The exact weight to apply to a housing scheme, deemed to be a sustainable development, when weighed against the adverse impacts, will remain a matter of judgement for the decision maker; however, the level of under-supply as determined under the 5 year housing land supply assessment will clearly be a factor.
48. Small scale developments make an important contribution to the district's housing supply; however, a small-scale scheme is unlikely to significantly address an under-supply on its own. There will be a presumption in favour of sustainable development and the benefits of the development when weighed against the potential adverse impacts will be a matter of judgement.
49. A Local Planning Authority is required to demonstrate 5 years' worth of deliverable sites against 5 years' worth of housing requirement. To address any under-supply that emerges through the 5 year housing land supply assessment will require deliverable land for housing applications that can feasibly provide completions in the next 5 years.
50. Outline permissions will often take longer to start delivering as they require further reserved matters applications to provide the required information to acquire full permission status. This all takes time and reduces the potential that it will deliver in the next 5 years whilst a full planning application will be in a better position to deliver new homes upon receiving permission so carries greater benefit in addressing any under-supply.
51. Furthermore, applications that provide supporting evidence that effectively shows a strong potential for delivery within the next 5 years could be considered by the decision maker to be of increased benefit due to its potential to address an under-supply of deliverable land in the more immediate future.
52. Applicants should be particularly mindful of the importance of early engagement with the community on proposals for housing development that would be contrary to the development plan.
53. In the majority of the District, development may affect Habitats Sites and require strategic and/or on site mitigation. Of importance to this, given the effect of Paragraph 11, is the following paragraph 195 of the NPPF:

*"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."*

### Sites allocated in the Local Plan

54. The application of paragraph 11 (d) to the decision making process is not expected to change the Council's position in regards to its allocated sites which are still expected to come forward in accordance with that policy. The allocation policies were thoroughly assessed through the Local Plan examination and the policy stipulations are required to deliver a

sustainable and well-designed site. This statement is instead aimed towards windfall development that would otherwise be contrary to the Local Plan.

## Neighbourhood Plans

55. Under paragraph 14 of the NPPF, there are provisions for Neighbourhood Plans which states:

*“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*

*a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*

*b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)”*

56. In the Waveney Local Plan area, this currently applies to the [Bungay Neighbourhood Plan](#) area, up to 23 November 2027.

## First Homes

57. The [East Suffolk Affordable Housing SPD](#) was adopted in May 2022 and it set out the Council’s position on First Homes which reflected the legislation and National Planning Policy Framework of that time. The latest version of the National Planning Policy Framework published in December 2024 removes the requirement to deliver a minimum of 25% of affordable housing as First Homes. East Suffolk Council will now implement the Local Plan policies on affordable housing without expecting provision of First Homes, but will continue to seek other tenure types such as affordable rent, social rent and shared ownership.

## How long does this statement remain in place?

58. This Interim Housing Position Statement reflects East Suffolk Council’s position as of March 2025. However, it will be revisited should there be a material change in circumstance such as the future Suffolk Coastal Local Plan review assessment and any future Statement of Housing Land Supply which determines that the Waveney Local Plan area can demonstrate a 5 year housing land supply.

59. The Suffolk Coastal Local Plan is five years old on 23<sup>rd</sup> September 2025 and a review assessment will be conducted under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 prior to this date.

60. A Housing Land Supply assessment is undertaken yearly with the most recently adopted version published in November 2024. A new Housing Land Supply Assessment will be undertaken in late 2025, taking account of monitoring data for 2024/25 and the available

supply as at 31<sup>st</sup> March 2025, and the results of this assessment may render this statement obsolete should a demonstrable 5 year supply be shown for the Waveney Local Plan area.

61. A Housing Action Plan which identifies actions to support the delivery of planned housing growth across the East Suffolk area will be published later in 2025.

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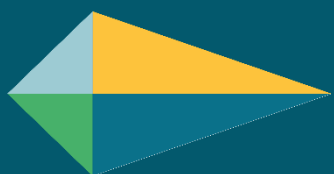
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