

Appendix 5

Summary of Consultation Responses to Draft Position Statement

Reference	Consultee	Key Points Raised	Action Taken/ Comments	Justification for Course of Action
MSDC1	AAH Planning	5-year land supply has not been confirmed initially through an up-to-date plan.	No action taken.	Mid Suffolk do not currently have an up-to-date Local Plan, and once this is the case, the appropriate steps will be taken to ensure this is the case.
		Local Housing Need should be calculated using the standard method. This is 590dpa.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		Production of an action plan in accordance with HDT.	No action taken.	This is to be undertaken as part of additional work by the Council separate to this position statement.
		20% buffer should be applied.	No action required.	20% buffer is already applied to the Council's five-year land supply requirement.
		Sites in the 'Under Construction' category do not take into account the Woolpit appeal decision where the Inspector accepted the appellants figures over the Councils.	No action required.	The base date of the assessment is 1 st October 2018, therefore, Union Road, Onehouse, which obtained full planning permission in August 2018, can now be included in the supply. Likewise, with West of Barton Road, the site obtained full permission in July 2018 and can therefore be included in the deliverable supply.
		No consideration of a lapse rate. Requests a 'risk review' is undertaken to establish if there is the need for one.	Clarification is required in the Position Statement as to why no lapse rate has been included in the calculation.	Case law confirms a lapse rate is not required to be included in the five-year land supply calculation and when applied to the entire deliverable supply as would be the case in Mid Suffolk, can result in 'double counting' with the application of a 20% buffer.
		The sites with outline planning permission as 'clear evidence' postdates 1 st October 2018. The MoU's are after 1 st October 2018 and there is no clear evidence to justify the inclusion of these sites.	No action required.	Only sites with clear evidence at 1 st October 2018 have been included in the Council's supply. All sites with outline planning permission had a reserved matter lodged or determined prior to 1 st October 2018 with evidence of a national or regional housebuilder engaged with the site. Only those sites with clear evidence at 1 st October 2018 have been pursued by the Council in respect of an MoU.
		2 sites included in the supply have no MoUs.	Agreed.	These MoU's were not finalised in time for the consultation. However, clear evidence was present at 1 st October 2018. Both sites have regional or national housebuilders on board and are actively discharging conditions. Reserved matters application were both lodged prior to 1 st October 2018 from said housebuilders.
Sites with outline planning permission included in the supply with no MoU or any other evidence. Submission of RM as determined in Woolpit appeal is not clear evidence.	Agreed.	Sites have only been included in the deliverable supply where clear evidence was present at 1 st October 2018. Reserved matters application were both lodged prior to 1 st October 2018 from said housebuilders.		

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		<p>Queries accuracy of MoU's in the case of:</p> <ul style="list-style-type: none"> o Ixworth Road, Thurston o North Side of Norton Road, Thurston o Old Stowmarket Road, Woolpit <p>East of Turkeyhall Lane and North of North Close, Bacton</p>	No action required.	All MoU's were correct at the time of preparation. This is all that is required by the PPG in producing clear evidence.
		Appellant during Woolpit appeal identified 108 defective planning permissions in the small sites category.	The spreadsheet will be updated accordingly to show the current status of the site for clarity of the reader.	<p>All small sites have been sense checked by the Council and where an application has seemingly expired or due to expire, contact has been made with the agent/applicant to determine the status of the site. Sites that no longer have permission or no certainty as to the status of the site, has been removed.</p> <p>After a thorough check by the Council, not all 108 'defective' permissions were defective as claimed.</p>
MSDC2	Bloor Homes (c/o Strutt & Parker)	20% buffer should be applied.	No action required.	20% buffer is already applied to the Council's five-year land supply requirement.
		Local Housing Need should be calculated using the standard method and 2014-based household projections.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		Purpose of the Position Statement is unclear.	Additional explanatory paragraphs to be added to Position Statement.	The Council have clarified the purpose of the Position Statement to be an updated assessment of the housing land supply position in Mid Suffolk having regard to the recent changes in national policy and guidance. It will be an informal planning document that does not form part of the Development Plan or AMR and will be a material consideration until a subsequent statement is published.
		Period of Assessment should be 1 st April, not 1 st October.	Provide explanatory paragraph.	The five-year land supply position has a base date of 1st October 2018. This is because it became clear following the outcome of the Woolpit appeal that the clear outdatedness of the land supply position presented under the AMR of July 2018 against the new Framework (2018) necessitated an update to be commenced so that for the purposes of appeals and decision-taking purposes, decisions can be made based upon the most up-to-date evidence. 1st October 2018 represented the earliest practical date for commencement and basing of that evidence.
		Windfall allowance is based on a small sample size of just 4 years. In addition, a determinant factor in granting of planning permission for dwellings is the absence of a five-year land supply and therefore, windfall sites cannot be relied upon. Therefore, past windfall should be reviewed and those approvals which were predicated on the lack of a five-year housing land supply should be removed.	No action taken.	<p>In the filtering process, the windfall assessment removed sites granted on appeal, and sites of more than 10 dwellings. It is reasonable to assume therefore that sites outside the settlement development limit, and therefore likely to be approved on lack of five-year land supply grounds, have been removed as part of this filtering process.</p> <p>The Council do not hold any evidence on windfall rates prior to 2014. It is not possible to undertake analysis on a larger sample of years.</p>

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		Appendix 4 suggests that some sites with detailed permission will be phased over a period beyond five years, contrary to the assertion of paragraph 5.2.	Clarification required in paragraph 5.2.	Paragraph 5.2 is paraphrasing the PPG which deems detailed planning consents deliverable unless there is evidence of viability issues, no longer any demand for the type of units or sites that have long term phasing plans as approved under a planning application. The trajectory in Appendix 4 is not a phasing plan.
		Amend the position statement to include details of the discussions held with all known landowners, agents and developers, and to clarify where there was no known landowner/agent/developer, the approach taken in such circumstances.	Provide an appendix document which lists all notified of the draft Position Statement as part of the consultation.	This will be contained in Appendix 5 of the Position Statement to provide clear and transparent dialogue.
		2 x MoU's have not been signed by the site developer.	No action required.	Clear evidence was present at 1 st October 2018.
		Local Lead-in times based on a small sample.	Review lead-in times and liaise with Council to seek further evidence.	Local lead-in times is based on a small sample, the figure used in the report is supported by national evidence, which did not find significantly longer lead-in times except in the case of large strategic sites (500+ dwellings)..The Council identified sites which delivered its first completion within the last 5 years (since 2014) where the information was available for corresponding date of approval, known start dates and known completion rates.
		Consideration given to factoring in timescales for determination of planning applications in order to provide more pertinent data for likely current lead-in times for development.	No action required.	The local evidence on lead-in times identifies the starting point as submission of the planning application, therefore timescales for determining planning applications are already factored into the likely lead-in times. It is not prudent to focus specifically on one element of the process. The local lead-in times are supported by national evidence and it is not considered the lack of an assessment solely on the planning approval period renders the lead-in assessment inadequate.
		Clarification sought on why median is used for delivery rates when extreme outliers have already been removed.	Revert to mean with exclusion of extreme outliers.	Agree with comments made and will make it possible to draw comparisons with national evidence.
		Some sites included in the delivery rates local evidence are phases of larger sites. Request to revisit evidence.	Remove phases from analysis.	No details of other phases were available, and no additional analysis could be undertaken. These parcels have been removed from the analysis.
		Production of an action plan in accordance with HDT.	No action taken.	This is to be undertaken as part of additional work by the Council separate to this position statement.
MSDC3	CEMEX Operations Ltd (c/o Barton Wilmore)	Local Housing Need should be calculated using the standard method and updated to use 2014-based household projections, which, with a 20% buffer.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		Clear reference should be made to which PPG chapters the references come from.	Amended to reflect request.	For clarity purposes.

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	No consideration of a lapse/non-implementation rate.	Clarification is required in the Position Statement as to why no lapse rate has been included in the calculation.	Case law confirms a lapse rate is not required to be included in the five-year land supply calculation and when applied to the entire deliverable supply as would be the case in Mid Suffolk, can result in 'double counting' with the application of a 20% buffer.
	No glossary provided defining 'lead-in times', 'build rates', 'completion rates' or 'delivery rates'	Provide glossary as an appendix.	For clarification purposes.
	Combine Table 5 with Table 15 to show percentage of windfall sites as a proportion of net completions.	To update accordingly.	For clarity purposes.
	Additional detail required as to how the sites in the local evidence on lead-in times and delivery rates were identified.	Add explanatory paragraph to Position Statement.	The Council looked at sites with first completions recorded within the last 5 years for which there was a corresponding date of approval, known start date and known completion dates. There was no filtering process other than to identify sites which met the aforementioned criteria.
	Small Sample size for lead-in times and build-out rates.	Explanatory paragraph to be added to Position Statement.	Whilst local lead-in times is based on a small sample, this is supported by national evidence, which did not find significantly longer lead-in times except in the case of large strategic sites (500+ dwellings). The Council identified sites where first completion was recorded on the site in the last 5 years and the information was available for corresponding date of approval, known start dates and known completion rates There was no filtering of sites other than to identify those which met the aforementioned criteria.
	Unclear which sites identified for lead-in times and build-out rates occurred as windfall and which were allocations. 70% of chosen sites should be windfall sites to represent characteristic of completions in the district.	Provide an explanatory paragraph explaining choice of sample used.	The data available does not allow for such type of analysis.
	Some sites identified in the local evidence on delivery rates and lead-in times were granted permission in 2012 and is a historic permission which should not be relied upon. Sites should be less than 5 years old.	No action required.	Only sites delivering completions since October 2014 have been included in the analysis. The analysis provides local evidence on delivery rates and lead-in times for the last 5 years.
	Table on lead-in times mistakenly takes first completion to be the same as a start on site and calculated the lead in time to be the time between submission of application to start on site. Make in accordance with Annex 2 of the Framework and update to reflect grant of permission to first completion on site.	Update table to state, 'No. of Days between submission of application and first completion recorded'. No other action required.	Lead-in time is intended to be submission of application to first completion on site owing to the nature of data available from the Council. Submission of a planning application is the only quantifiable measure that can be used.
	Series of site-specific inconsistencies Tables 9 and 10: 1. M/3310/14/FUL- difference in time period and no. of dwellings approved online to that	Amend site capacity of 3310/14 to 276 dwellings and update date of first completion to 1 st March 2016 to address typo.	M/3310/14/FUL- The permission was for 276 dwellings. The application to discharge all pre-commencement conditions was submitted the day after permission was granted, on 18 th June 2015 and subsequently discharged in December 2015. First completion was recorded in March 2016.

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		<p>noted in the report. Similarly, completions are recorded before conditions were discharged.</p> <p>M/0958/16/FUL- First completion recorded before conditions discharge approval.</p>	No other actions required.	M/0958/16/FUL- The first discharge of conditions, as shown on the online planning search facility was permitted 26 th October 2016. First completion was recorded 2 nd February 2017.
		Questions delivery rates. Delivery rates should be split for applying rates of delivery for sites above and below 100 dwellings.	No action required.	National evidence has been reviewed and the delivery rates applied fall below that of the national evidence, and it is considered sufficiently robust.
		Questions the decision of windfall allowance and the exclusion of sites greater than 11 dwellings from the assessment.	No action required.	In accordance with the Framework local authorities can only make an allowance for windfall if these is compelling evidence such sites will continue to be a reliable source of supply. The windfall assessment has removed sites or more than 10 dwellings because these are typically sites of this size become allocated for residential development in a Local Plan. As the emerging Local Plan progresses through to adoption, it is not considered sites in excess of 10 dwellings will continue to be a reliable source of windfall and therefore have been removed from the assessment to make it more robust.
		Discrepancy of deliverable supply between paragraph 7.2 and table 16.	Amend paragraph 7.2 to reflect table 16.	To correct a typo.
		Request removal of Former Scotts/Fisons Site from supply has the permission will expire in April 2019 and there is no evidence to support the view the permission will be implemented.	Remove Site from Supply along with Groves Farm and Whitton Park.	To make statement more robust.
MSDC4	Elmswell Parish Council	Councillors broadly support a robust and realistic assessment leading to a sound and defensible conclusion.	No action required.	N/A
MSDC5	Endurance Estates (c/o Pegasus Group)	Clarification Is required as to the purpose of the Position Statement including whether it is intended to be submitted to the Planning Inspectorate.	Additional explanatory paragraphs to be added to Position Statement.	The Council have clarified the purpose of the Position Statement to be an updated assessment of the housing land supply position in Mid Suffolk having regard to the recent changes in national policy and guidance. It will be an informal planning document that does not form part of the Development Plan or AMR and will be a material consideration until a subsequent statement is published.
		Assumptions on delivery rates are unreliable and, in some cases, based on a period of less than a full year.	No action required.	The sample identified are from those sites which delivered its first completion within the last 5 years (since 2014) where the information was available for corresponding date of approval, known start dates and known completion rates. To remove any additional sites would reduce the sample size.
		A combined rate of 160dpa is proposed in the village of Thurston and Pegasus question whether the combined rate can be sustained in	No action required.	Thurston is a highly desirable settlement which housebuilders wish to build in.

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		one village.		
		Some sites appear to have recorded completions despite no start having been made on site as well as others which have appear to have stalled (no examples provided) and some have permissions that are due to expire in the coming months.	No action required.	Over a three-month period, officers sought to secure primary evidence to demonstrate deliverability by engaging in direct telephone and face to face conversations with individual site developers, their planning agents' representatives on sites. Officers also undertook visits to individual sites to inspect and verify commencement and clarify built-out expectations. Officers visited several sites seeking to inspect any works that would confirm commencement of the development and to count the number of dwelling units delivered at that time. During those face to face conversations with site representatives also secured further, updated information on expected build out moving forward.
		Seeks an annualised breakdown of delivery forecasts for the full plan period.	No action required.	The position statement only deals with housing land supply and long term delivery will be dealt with in subsequent Local Plan and AMRs.
MSDC6	Gladman Developments Ltd	Period of Assessment should be 1 st April, not 1 st October.	Provide explanatory paragraph.	The five-year land supply position has a base date of 1st October 2018. This is because it became clear following the outcome of the Woolpit appeal that the clear outdatedness of the land supply position presented under the AMR of July 2018 against the new Framework (2018) necessitated an update to be commenced so that for the purposes of appeals and decision-taking purposes, decisions can be made based upon the most up-to-date evidence. 1st October 2018 represented the earliest practical date for commencement and basing of that evidence.
		The consultation document was published on the Council's website but interested parties were not specifically notified.	No action required.	The consultation document was published on a dedicated project webpage on the Babergh Mid Suffolk Council's website with signposting links from the AMR and Housing pages. Emails announcing the consultation were sent to all contacts on the mailing list, but unfortunately Gladman's were not on the mailing list. The Council did allow those who wished to respond additional time when not directly notified.
		Appendix 5 needs to provide details of the stakeholders directly consulted.	To be updated following consultation.	For clarity and transparency purposes.
		No consideration of a lapse rate. Requests a 'risk review' is undertaken to establish if there is the need for one.	Clarification is required in the Position Statement as to why no lapse rate has been included in the calculation.	Case law confirms a lapse rate is not required to be included in the five-year land supply calculation and when applied to the entire deliverable supply as would be the case in Mid Suffolk, can result in 'double counting' with the application of a 20% buffer.
		Historic shortfall needs to be taken into account through the five-year land supply assessment.	No action required.	No under supply/previous under delivery is taken into account when using the LHN as the standard method includes a 40% uplift to account for any shortfall. Therefore, no backlog of unmet need needs to be taken into account when calculating the Council's housing land supply position.
		20% buffer should be applied.	No action required.	20% buffer is already applied to the Council's five-year land supply requirement.

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		Lead-in times can be considerably longer than 2.7 years.	No action required.	Local evidence is supported by national evidence. Inevitably some sites will deliver significantly quicker or slower than 2.7 years, but a consistent approach has been taken in applying lead-in times.
		Where 50dpa has been applied to sites in the supply, this should be reduced to 40dpa in line with local evidence.	No action required.	The only sites which do not use 40dpa, and have a higher rate of 50dpa, have a track record of delivering above and beyond this rate. Therefore, it is justified to use 50dpa where the evidence deems appropriate.
MSDC7	Harrow Estates (c/o Armstrong Rigg Planning)	MoUs/details equivalent to, should be provided on all sites.	No action required.	MoUs are not required on all sites, only those with outline planning permission or Local Plan allocations in line with National Planning Policy and Guidance.
		Local Housing Need should be calculated using the standard method and updated to use 2014-based household projections.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		20% buffer should be applied.	No action required.	20% buffer is already applied to the Council's five-year land supply requirement.
		Production of an action plan in accordance with HDT.	No action taken.	This is to be undertaken as part of additional work by the Council separate to this position statement.
		<p>Questions 'clear evidence' on sites included in five year supply with outline planning permission.</p> <p>M/5070/16/OUT- MoU signed by land promoter not developer of the site, no RM has been submitted as suggested by MoU, no pre-commencement conditions have been discharged, no details on outcome of pre-app discussions, no evidence of any site assessment work.</p> <p>M/1636/16/OUT- MoU signed by land promoter not developer of the site, no RM has yet been submitted as suggested by MoU, no evidence any pre-commencement conditions have been discharged, no explanation as to the outcome of pre-app discussions, no detailed evidence on site assessment work.</p> <p>DC/18/00723/OUT- MoU is signed by land promoter, not developer of the site, an RM has not yet been submitted as suggested would occur in the MoU, no evidence of discharging pre-commencement conditions, no evidence of pre-application discussions, no detailed evidence on site assessment work.</p>	No update required.	All MoUs were correct at the time of preparation. This is all that is required by the PPG in producing clear evidence.
There are a number of sites which are due to expire shortly and for which either no pre-commencement conditions have	No action required.	Sites with full planning permission are considered deliverable unless there is 'clear' evidence to suggest otherwise. At 1 st October 2018, there was no clear evidence the site would not deliver completions and		

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		been discharged or have a number outstanding which Armstrong Rigg consider to be clear evidence the site will not deliver.		the permission, until April 2019, is extant. These permissions have not yet expired and will not have expired at the point of adoption of the Position Statement. They are currently capable of implementation and the projections for delivery in the five-year period remain reasonable.
		Significant number of small sites which have either expired or due to expire and for which no pre-commencement conditions have been discharged.	No action required.	The Council contacted each applicant/agent where the permission was suspected of expiring and where this the case, have been removed from the supply. Where not contactable, Building Control records were used to identify if a site has commenced, and where there are no records, these sites have been removed from the supply.
		Questions delivery rates on 4 of the sites with outline planning permission, each should be rolled on by one year.	No action required.	No adjustments are considered necessary. All outline sites expected to deliver the identified completions by 30 th September 2020. All sites expected to deliver 40 dwellings in 2019/20 have reserved matters approved or going to committee in March 2019. 2 x sites are expected to deliver 20 and 15 dpa respectively in 2019/20 and are the least advanced of the outline sites, but have an RM submitted or under preparation. This is considered a realistic anticipated delivery and one consistent with the signed MoUs (where relevant).
MSDC8	Brome and Oakley Parish Council	The Council welcomes the evidence that Mid Suffolk now has a housing land supply position of 5.32 years.	No action required.	n/a
MSDC9	Hoxne Parish Council	The Council welcomes the evidence that Mid Suffolk now has a housing land supply position of 5.32 years.	No action required.	n/a
MSDC10	Natural England	Natural England has no comment to make on the Housing Land Supply Position Statement 2018/19	No action required.	n/a
MSDC11	Pigeon Investment Management	Period of Assessment should be 1 st April, not 1 st October.	Provide explanatory paragraph.	The five-year land supply position has a base date of 1st October 2018. This is because it became clear following the outcome of the Woolpit appeal that the clear outdatedness of the land supply position presented under the AMR of July 2018 against the new Framework (2018) necessitated an update to be commenced so that for the purposes of appeals and decision-taking purposes, decisions can be made based upon the most up-to-date evidence. 1st October 2018 represented the earliest practical date for commencement and basing of that evidence.
		Local Housing Need should be calculated using the standard method and updated to use 2014-based household projections.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		No consideration of a lapse rate. Requests a 'risk review' is undertaken to establish if there is the need for one.	Clarification is required in the Position Statement as to why no lapse rate has been included in the calculation.	Case law confirms a lapse rate is not required to be included in the five-year land supply calculation and when applied to the entire deliverable supply as would be the case in Mid Suffolk, can result in 'double counting' with the application of a 20% buffer.

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		4 years of historic windfall data is not sufficient to provide compelling evidence, so the windfall should only be included for the final two years to avoid double counting 3 period for implementation.	Add explanatory paragraph into method section in Position Statement.	The Council do not have any details records of windfall completions prior to 2014 and so this exercise cannot be undertaken for more than 4 years.
MSDC12	Newhall Properties (Ltd) (c/o Carter Jonas)	The Position Statement fails to make any reference to any form of specialist housing and how this has been calculated within the supply.	Add explanatory paragraph into method section of Position Statement.	The Council have only recently started monitoring specialist accommodation and there is no historical data available. No specialist accommodation has been included in the supply.
		No consideration of a lapse rate. Requests a 'risk review' is undertaken to establish if there is the need for one.	Clarification is required in the Position Statement as to why no lapse rate has been included in the calculation.	Case law confirms a lapse rate is not required to be included in the five-year land supply calculation and when applied to the entire deliverable supply as would be the case in Mid Suffolk, can result in 'double counting' with the application of a 20% buffer.
		There are a number of sites which are due to expire shortly and for which either no pre-commencement conditions have been discharged or have a number outstanding which AR consider to be clear evidence the site will not deliver.	Removal of Whitton Park, Groves Farm and Former Scotts Site from supply.	To make position more robust.
		Questions 'clear evidence' on sites included in five-year supply with outline planning permission. M/5070/16/OUT- no RM has been submitted as suggested by MoU. M/1636/16/OUT- no RM has yet been submitted as suggested by MoU DC/18/00723/OUT- an RM has not yet been submitted as suggested would occur in the MoU.	No action required.	All MoUs were correct at the time of preparation. This is all that is required by the PPG in producing clear evidence.
MSDC13	Norfolk County Council	No comment to make.	n/a	n/a
MSDC14	Manor Oak Homes (c/o Armstrong Rigg Planning)	Local Housing Need should be calculated using the standard method and updated to use 2014-based household projections.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		20% buffer should be applied.	No action required.	20% buffer is already applied to the Council's five-year land supply requirement.
		Production of an action plan in accordance with HDT.	No action taken.	This is to be undertaken as part of additional work by the Council separate to this position statement.
		Questions 'clear evidence' on sites included in five-year supply with outline planning permission. M/5070/16/OUT- MoU signed by land promoter not developer of the site, no RM has been submitted as		All MoU's were correct at time of preparation. These satisfy the requirements of the PPG in terms of detail required.

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		<p>suggested by MoU, no pre-commencement conditions have been discharged, no details on outcome of pre-app discussions, no evidence of any site assessment work.</p> <p>M/1636/16/OUT- MoU signed by land promoter not developer of the site, no RM has yet been submitted as suggested by MoU, no evidence any pre-commencement conditions have been discharged, no explanation as to the outcome of pre-app discussions, no detailed evidence on site assessment work.</p> <p>DC/18/00723/OUT- MoU is signed by land promoter, not developer of the site, an RM has not yet been submitted as suggested would occur in the MoU, no evidence of discharging pre-commencement conditions, no evidence of pre-application discussions, no detailed evidence on site assessment work.</p>		
		<p>Number of sites with detailed permission and small sites due to expire shortly that have no pre-commencement conditions discharged and therefore should be removed.</p>	<p>No action required.</p>	<p>Over a three-month period, officers sought to secure primary evidence to demonstrate deliverability by engaging in direct telephone and face to face conversations with individual site developers, their planning agents' representatives on sites. Officers also undertook visits to individual sites to inspect and verify commencement and clarify built-out expectations.</p> <p>Officers visited several sites seeking to inspect any works that would confirm commencement of the development and to count the number of dwelling units delivered at that time. During those face to face conversations with site representatives also secured further, updated information on expected build out moving forward.</p>
		<p>Questions the delivery of the following sites:</p> <ol style="list-style-type: none"> 1. Ixworth Road, Thurston 2. Wetherden Road, Elmswell 3. Chilton Leys <p>Barton Road, Thurston</p>	<p>No action required.</p>	<p>No adjustments are considered necessary. All outline sites expected to deliver the identified completions by 30th September 2020. All sites expected to deliver 40 dwellings in 2019/20 have reserved matters approved or going to committee in March 2019. 2 x sites are expected to deliver 20 and 15 dpa respectively in 2019/20 and are the least advanced of the outline sites, but have an RM submitted or under preparation. This is considered a realistic anticipated delivery and one consistent with the signed MoUs (where relevant).</p>
<p>MSDC15</p>	<p>Scott Properties (c/o Strutt & Parker)</p>	<p>Purpose of the Position Statement is unclear. If intended to be an Annual Position Statement which will be submitted to the Secretary of State it should be made clear.</p>	<p>Additional explanatory paragraphs to be added to Position Statement.</p>	<p>The Council have clarified the purpose of the Position Statement to be an updated assessment of the housing land supply position in Mid Suffolk having regard to the recent changes in national policy and guidance. It will be an informal planning document that does not form part of the Development Plan or AMR and will be a material consideration until a subsequent statement is published.</p>

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	20% buffer should be applied.	No action required.	20% buffer is already applied to the Council's five-year land supply requirement.
	Period of Assessment should be 1 st April, not 1 st October.	Provide explanatory paragraph.	The five-year land supply position has a base date of 1 st October 2018. This is because it became clear following the outcome of the Woolpit appeal that the clear outdatedness of the land supply position presented under the AMR of July 2018 against the new Framework (2018) necessitated an update to be commenced so that for the purposes of appeals and decision-taking purposes, decisions can be made based upon the most up-to-date evidence. 1 st October 2018 represented the earliest practical date for commencement and basing of that evidence.
	Seeks clarification on whether delivery in MoU same period of time as trajectory is (i.e. 1 st October 2018-30 th September 2019, or calendar year).	Add explanatory paragraph to Position Statement.	Where only year is specified in the MoU, this relates to the calendar year. In those instances where two years are specified (i.e. 2019/20) this is for year commencing 1 st October 2019 to year ending 30 th September 2020.
	Windfall allowance is based on a small sample size of just 4 years. In addition, a determinant factor in granting of planning permission for dwellings is the absence of a five-year land supply and therefore, windfall sites cannot be relied upon. Therefore, past windfall should be reviewed and those approvals which were predicated on the lack of a five-year housing land supply should be removed.	No action taken.	In the filtering process, the windfall assessment removed sites granted on appeal, and sites of more than 10 dwellings. It is reasonable to assume therefore that sites outside the settlement development limit, and therefore likely to be approved on five year land supply grounds, have been removed as part of this filtering process. The Council do not have detailed records of windfall completions prior to 2014 and no additional years can therefore be assessed.
	Appendix 4 suggests that some sites with detailed permission will be phased over a period beyond five years, contrary to the assertion of paragraph 5.2	Clarification required in paragraph 5.2.	Paragraph 5.2 is paraphrasing the PPG which deems detailed planning consents deliverable unless there is evidence of viability issues, no longer any demand for the type of units or sites that have long term phasing plans as approved under a planning application. The trajectory in Appendix 4 is not a phasing plan.
	Amend the position statement to include details of the discussions held with all known landowners, agents and developers, and to clarify where there was no known landowner/agent/developer, the approach taken in such circumstances.	Update Appendix 5 and provide an appendix document which lists all notified of the draft Position Statement as part of the consultation.	For clarity and transparency.
	Not all landowners/agents have been contacted by the LPA in respect of sites pending consideration.	No action required.	In respect of individual sites, only the landowners/agents/applicants of sites to be included in the supply have been contacted. Where sites have permissions pending (as per the cited example), they cannot be included in the supply until determined in line with the definition of 'deliverable' identified in the Framework.
	2 x MoU's have not been signed by the site developer.	No action required.	These sites had clear evidence at 1 st October 2018.
	Local Lead-in times based on a small sample.	Review lead-in times and liaise with Council to	Whilst local lead-in times is based on a small sample, this is supported by national evidence, which did not

Appendix 5

			seek further evidence.	find significantly longer lead-in times except in the case of large strategic sites (500+ dwellings).
		Consideration given to factoring in timescales for determination of planning applications in order to provide more pertinent data for likely current lead-in times for development.	No action required.	The local evidence on lead-in times identifies the starting point as submission of the planning application, therefore timescales for determining planning applications are already factored into the likely lead-in times.
		Clarification sought on why median is used for delivery rates when extreme outliers have already been removed.	Revert to mean with exclusion of extreme outliers.	Agree with comments made and will make it possible to draw comparisons with national evidence.
		Some sites included in the delivery rates local evidence are phases of larger sites. Request to revisit evidence.	No action required.	No details of other phases were available, and no additional analysis could be undertaken.
MSDC16	Kevin Morley			
MSDC17	JS Cottages			
MSDC18	Country House Homes Ltd	Country House Homes were not notified of the consultation and came across the website page by chance.	No action required.	The consultation document was published on a dedicated project webpage on the Babergh Mid Suffolk Council's website with signposting links from the AMR and Housing pages. Emails announcing the consultation were sent to all contacts on the mailing list, but unfortunately Country House Homes were not on the mailing list.
		Local Housing Need should be calculated using the standard method. This is calculated to be 602dpa.	Update LHN to reflect February 2019 changes to guidance.	LHN is already used in the calculation of the five-year land supply requirement, however the LHN is not 602dpa. Since the consultation the Guidance has changed and now requires the 2014-based household projections to be used with a 10-year period of 2019-2029. This results in an LHN figure of 575dpa.
		Tables 6, 7 and have errors in the calculations (no explanation identified).	To be double checked.	For clarity and sense checking purposes.
		No summary of expired permissions or demolitions that have been carried out or approved. No analysis of the small sites that have yet to deliver and no demonstration that windfall analysis is robust.	No Action Required.	Data not available.
		Questions the MoU's. They do not reflect the exact situation: Chilton Leys: 1. 15 units will not be completed in 2019 as stated; 2. Phase 2 will not deliver as quickly as Phase 1; 3. Requests 40 dwellings are removed from five-year supply.	No action required.	MoU's were correct at time of preparation.

Appendix 5

		<p>Ixworth Road:</p> <ol style="list-style-type: none"> 1. RM has not been determined as expected in MoU 2. Rm cannot be determined until May 2019 at the earliest 3. Site is still in ownership of landowner, not Persimmon. 4. Development will not commence until 2020. 5. 50 dwellings should be removed from Council's supply 6. 2.7 years lead-in time is not sufficient. 7. MoU is over stated and overly ambitious <p>North of Norton Road, Thurston</p> <ol style="list-style-type: none"> 1. No RM has been submitted. 2. Restrictive pre-comms conditions attached to planning approval to stop hedgerows being cut, removed or altered between 1st March and 31st August and also for archaeological evaluation. 3. No delivery in 2019/20 and 2.7 years lead-in time is not sufficient. <p>Old Stowmarket Road, Woolpit</p> <ol style="list-style-type: none"> 1. No RM has been submitted 2. Land has not been sold to BDW. 3. Outline permission has restrictive pre-commencement conditions. Re. hedgerows and archaeological evaluation. 4. Unrealistic lead-in times. <p>Turkey Hall Lane, Bacton</p> <p>Questions delivery timescales due to a number of factors but makes no adjustment to five year supply.</p>		
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