



Housing Land Supply Position Statement 2018/19 Mid Suffolk District Council

March 2019



| CONTENTS | PAGE |
|---|-------------|
| 1.0 Introduction | 4 |
| a) MSDC Housing Land Supply Position Statement – Draft for Consultation January 2019 | 4 |
| 2.0 Policy and Guidance | 6 |
| a) National Planning Policy and Guidance..... | 6 |
| i) Identifying the Housing Requirement..... | 6 |
| ii) Determining the Supply | 7 |
| iii) Approach to Preparing Five Year Land Supply Statements | 8 |
| b) Local Housing Need Calculation for Mid-Suffolk..... | 8 |
| c) Housing Delivery Test Calculation..... | 9 |
| d) Previous Housing Requirements | 9 |
| 3.0 Evidence on the Delivery of Housing..... | 11 |
| a) National Evidence on Housing Delivery on Housing Sites | 12 |
| b) Completions per Outlet from National House Builders..... | 17 |
| c) Local Market Evidence- Past Delivery | 18 |
| d) Local Market Evidence- Lead-In Times | 19 |
| e) Conclusion on Potential Delivery Rates and Lead-In Times | 21 |
| 4.0 Method | 23 |
| a) Method of Consultation | 23 |
| b) Initial Identification of Sites..... | 23 |
| c) Assumptions on Lead-In Times and Delivery Rates | 24 |
| d) Sites Under Construction | 25 |
| e) Sites with Full Planning Permissions | 25 |
| f) Sites with Outline Planning Permissions | 26 |
| g) Sites under 10 Dwellings..... | 26 |
| h) Lapse Rate..... | 27 |
| i) Windfall | 27 |
| j) Specialist Accommodation | 27 |



| | |
|--|-----------|
| 5.0 Site Assessments..... | 28 |
| a) Sites with Detailed Planning Permission..... | 28 |
| b) Sites with Outline Planning Permission | 28 |
| c) Summary of Housing Land Supply | 31 |
| | |
| 6.0 Windfall Assessment | 32 |
| a) Methodology | 32 |
| b) Sources of Windfall | 33 |
| | |
| 7.0 Land Supply Position..... | 35 |
| a) Housing Land Supply Components and Housing Land Supply Position | 35 |
| | |
| Appendix 1: NPPF/PPG Checklist | 36 |
| Appendix 2: List of Documents Referenced..... | 38 |
| Appendix 3: Collection of Memorandums of Understandings in Respect of the Following Sites:..... | 40 |
| Appendix 3a: Land North of Chilton Leys, Stowmarket, MoU | 41 |
| Appendix 3b: Land west of Ixworth Road, Thurston, MoU | 42 |
| Appendix 3c: Land on the North Side of Norton Road, Thurston, MoU | 43 |
| Appendix 3d: Land to the east of Turkeyhall Lane and to the North of North Close, Bacton, MoU | 44 |
| | |
| Appendix 4: Housing Trajectory..... | 45 |
| Appendix 5: Summary of Stakeholders Consulted and Comments Received | 46 |
| Appendix 6: Glossary of Terms..... | 47 |

1.0 INTRODUCTION

- 1.1 This Housing Land Supply Position Statement ('HLSPS') provides information on the five-year housing land supply for the Mid Suffolk district and covers the period from 1st October 2018 to 30th September 2023. All the information reported is the most up-to-date available at the time of publication.
- 1.2 The purpose of this HLSPS is to provide an updated assessment of the housing land supply position in Mid Suffolk, having regard to changes in national policy and guidance in respect of housing requirements and establishing a housing land supply. It has been produced in consultation with key stakeholders, informed by the comments received during the consultation process.
- 1.3 This final report is an informal planning document and does not form part of the statutory Development Plan or any adopted background document such as the Annual Monitoring Report ('AMR'). It is a material consideration in the assessment and determination of planning applications in the district between the date of publication and the date of any other statement on housing land supply (such as may be contained within the AMR) published subsequently.
- 1.4 The five-year land supply position has a base date of 1st October 2018. This is because, the AMR of July 2018, was prepared prior to the new Framework in 2018 and 2019, and therefore 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.
- 1.5 This report provides the Council's most up-to-date position on five-year housing land supply and the main differences between this report and the 2018 Annual Monitoring Report, published in July 2018 are:
- a. Rebases the housing completion and forecast data covering the period 1st October 2018 to 30th September 2023;
 - b. Reassesses the housing land supply in accordance with new National Planning Policy Framework ('The Framework') (2018, as amended 2019) and updated planning practice guidance ('PPG').
- 1.6 DLP Planning Ltd has worked alongside Mid Suffolk District Council in the preparation of this position statement.
- a) MSDC Housing Land Supply Position Statement - Draft for Consultation January 2019**
- 1.7 The National Planning Policy Framework (NPPF) requires local planning authorities to identify and maintain a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing supply (HLS).
- 1.8 The HLSPS is calculated by comparing the anticipated supply of new homes within the district over a five-year period against the Council's housing requirement. For Mid Suffolk District Council, the housing requirement is established by using the standard method provided by national policy and guidance. This is because the strategic housing policies in the Core Strategy for Mid Suffolk are more than five years old.



- 1.9 The HLS position published within the 2017/2018 Annual Monitoring Report (AMR) of July 2018 was based upon methodology and assumptions appropriate at the date of publication. Since the publication of the AMR, national policy and guidance, in respect of housing requirements and establishing a land supply has been revised. Therefore, the Council has now prepared a HLS position statement, which will update that contained in the July 2018 AMR.
- 1.10 It is important that the Council can adequately evidence its housing land supply position in order to inform decisions made that will continue to deliver new homes to meet ongoing needs. If the Council cannot show that it is meeting these housing needs, their policies with regards to residential development will be considered to be "out of date" and carry less weight when making decision on planning applications. In addition, it is important that stakeholders in the housing sector understand what the current land supply position of the Council is, in light of the change in circumstances following the AMR publication.

2.0 POLICY AND GUIDANCE

2.1 This section summarises the national policy and guidance of relevance to this HLSPS and outlines in detail the steps required to demonstrate a robust and transparent housing land supply.

2.2 An NPPF/PPG Checklist is provided at appendix 1.

a) National Planning Policy and Guidance

i) Identifying the Housing Requirement

2.3 Paragraph 73 of the 2018 National Planning Policy Framework requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their local housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old. The glossary currently defines local housing need as the number of homes identified as being needed through the application of the standard method set out in national planning guidance or a justified alternative approach.

2.4 For Mid Suffolk, the Council's five-year land supply position will be calculated against the local housing need figure (calculated by the standard method) as the existing strategic policies of the Core Strategy are more than five years old.

2.5 Paragraph 73 goes on to state that the supply of deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a. 5% to ensure choice and competition in the market for land; or
- b. 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c. 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

2.6 To determine the appropriate buffer, the Framework has introduced the Housing Delivery Test (HDT) which measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the HDT results for each local authority annually. Footnote 39 outlines that from November 2018, the application of a 20% buffer will be measured against the Housing Delivery Test where this indicates that delivery was below 85% of the Housing Requirement.

2.7 In addition, paragraph 037 of the PPG (Housing and Economic Land Availability) clarifies this further and outlines that in respect of calculating five-year housing land supply, a buffer should be added to the housing requirement over the plan period, before adding the relevant annual requirement. Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:

- a. *“the minimum buffer for all authorities, necessary to apply ensure choice and competition in the market, where they are not seeking to confirm a 5 year land supply (and where there delivery of housing over the previous 3 years, has not fallen below 85% of the requirement) is 5%;*

- b. *the buffer for authorities seeking to confirm a 5 year land supply, through an annual position statement or recently adopted plan (and where delivery of housing over the previous 3 years, has not fallen below 85%) is 10%; and*
- c. *the buffer for authorities where delivery of housing over the previous 3 years, has fallen below 85% of the requirement, is 20%.”*

2.8 Furthermore, with regards to the Local Housing Need Assessment, the Planning Practice Guidance (‘PPG’) provides greater detail on the approach to be adopted in prescribed circumstances. The PPG directs all local authorities with strategic housing policies plans older than 5 years or where they have been reviewed and found not to be -up-to-date, to use the Government’s local housing need using the standard method as the starting point for calculating the five-year housing land supply (Housing and Economic Land Availability, paragraph 030).

*ii) **Determining the Supply***

2.9 The Framework in Annex 2: Glossary indicates that for sites to be considered ‘deliverable’, they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years. In particular, the definition states that:

“Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

2.10 Paragraph 036 of the PPG (Housing and Economic Land Availability) outlines that for sites with outline planning permission, permission in principle, allocated in a development plan or identified in a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- a. *“Any progress being made towards the submission of an application;*
- b. *any progress with site assessment work; and*
- c. *any relevant information about site viability, ownership constraints or infrastructure provision.”*

2.11 The following examples have been provided in Paragraph 036 of the PPG (Housing and Economic Land Availability):

- a. *“a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.*
- b. *a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”*

*iii) **Approach to Preparing Five Year Land Supply Statements***

- 2.12 The PPG outlines at paragraph 047 (Housing and Economic Land Availability) that local planning authorities should consult stakeholders including developers on the range of assumptions used in five-year housing land supply position statements used as benchmarks for the delivery of sites including lead-in times and build-out rates.
- 2.13 Paragraph 052 of the PPG (Housing and Economic Land Availability) advises that local planning authorities should consult “*any specific consultation bodies the authority consider may have an interest, any general consultation bodies the authority consider are appropriate, and any residents or other persons carrying on business in the area from which the authority consider it appropriate to invite representations from*”. The PPG gives the following examples:
- a. small and large developers;
 - b. land promoters;
 - c. private and public land owners;
 - d. infrastructure providers (such as utility providers, highways, etc);
 - e. upper tier authorities (county councils) in two-tier areas;
 - f. neighbouring authorities with adjoining or cross-boundary sites.
- 2.14 Paragraph 052 goes on explain that local planning authorities may wish to set up an assessment and delivery group which could contribute towards Housing and Economic Land Availability Assessments, annual five-year land supply assessments and Housing Delivery Test Action Plans for the delivery of housing.

b) Local Housing Need Calculation for Mid-Suffolk

- 2.15 The LHN method sets out that the most up to date household projections must be used to calculate step 1, the 10-year average is based on 10 consecutive years, with the current year being the first year. In the worked example, the current year is given as 2019. Therefore, a period of 2019 to 2029 has been used to calculate the 10-year average, based upon published Government guidance.
- 2.16 In calculating the LHN for the Council, the following data has been used:
- a. 2014-based household projections (10-year average) = 414.8
 - b. Latest affordability ratio (2017) = 10.17
- 2.17 Average household increase from 2019 to 2029 is 414.8
- a. Households 2019= 44,210
 - b. Households 2029= 48,358

$$10\text{-year average household rate} = -(48,358 - 44,210) / 10 = 414.8$$

- 2.18 The adjustment factor is =0.385625 (10.17-1/4x0.25)

Local Housing Need = 575 dwellings per annum

$$(1 + 0.385625) \times 414.8 = 575$$

2.19 Local housing need cap is calculated by a 10-year average household growth rate +40%. For Mid Suffolk, this equates to 581 dwellings per annum.

$$414.8 \times 1.40 = 581$$

2.20 The LHN figure (575dpa) is less than the capped figure of 581dpa. Therefore, the LHN figure of 575 dwellings per annum has been identified as the appropriate LHN figure for this assessment, in line with national guidance.

c) Housing Delivery Test Calculation

2.21 The Housing Delivery Test ('HDT') as required by the Framework was published in February 2019 and the results of the HDT are outlined in table 1 below.

2.22 The results of this assessment indicate a buffer of 20% will be applicable to the calculation of the five-year land supply in Mid Suffolk.

Table 1. Housing Delivery Test for Mid Suffolk

| | | |
|-------------------------------------|---------------------|------------|
| Annual Requirement | 2015/16 Requirement | 424 |
| | 2016/17 Requirement | 420 |
| | 2017/18 Requirement | 430 |
| | Total | 1,274 |
| | | |
| Recorded Completions | 2015/16 Completions | 304 |
| | 2016/17 Completions | 305 |
| | 2017/18 Completions | 426 |
| | Total | 1,035 |
| | | |
| Housing Delivery Test Result | | 81% |

d) Previous Housing Requirements

2.23 Prior to the publication of the new National Planning Policy Framework in 2018, there was an identified housing need of 430 dwellings per annum as adopted in the Core Strategy. The standard method for calculating local housing need was adopted by Government in July 2018, and sets a new requirement based on up-to-date information of 575dpa. The Local Housing Need Figure must be used to calculate housing land supply where the adopted Local Plan (or Core Strategy) is more than 5 years old as is the case in Mid Suffolk District. A summary of the difference is set out in table 2 below.

2.24 During the consultation on the Council's Position Statement, the PPG was updated confirming the 2014-based household projections should be used in the calculation of the LHN with the method for calculating the LHN using the standard method updated to state "calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period)". Therefore, when calculating the LHN using the 2014-based household projections and covering a 10-year period of 2019-2029, the LHN for Mid Suffolk is now 575dpa.



Table 2. Summary of Previous Housing Requirements compared to Local Housing Need Figure

| | Dwellings Per Annum | Requirement with 20% Buffer |
|---|----------------------------|------------------------------------|
| Adopted Core Strategy Requirement | 430dpa | 516dpa |
| Strategic Housing Market Housing Assessment Requirement | 452dpa | 542dpa |
| Standard Method for Calculating Local Housing Need (2016-based household projections) | 590dpa | 708dpa |
| Standard Method for Calculating Local Housing Need (2014-based household projections) | 575dpa | 690dpa |

3.0 EVIDENCE ON THE DELIVERY OF HOUSING

- 3.1 This section reviews national evidence on delivery rates and lead-in times, the performance of national housebuilders and analyses local evidence on delivery rates and lead-in times. The approach advocated in Paragraph 047 of the Planning Practice Guidance (Housing and Economic Land Availability) ('PPG') outlines that assumptions on delivery rates and lead-in times need to be based on clear evidence, consulted upon with stakeholders and reviewed regularly and tested against actual performance on comparable sites.
- 3.2 Paragraph 048 of the PPG (Housing and Economic Land Availability) requires that for annual position statements of five-year housing land supply, for those sites with detailed planning permission, to detail the number of homes under construction and completed each year and where delivery has either exceed or not progressed as expected and the reasons for acceleration or delays to the commencement on site of effects on build-out rates where available, this information is in section 5. Some aspects of paragraph 048 of the PPG have not been possible due to lack of sufficient detail on site by site completion evidence held by the Council.
- 3.3 To inform the lead-in and delivery rates used, the following list of documents have been reviewed:
- a. Letwin Review (2018);
 - b. *Start to Finish How Quickly do Large-Scale Housing Sites Deliver?* NLP Paper (2016);
 - c. *'The Role of Land Pipelines in the UK Housebuilding Process'* by Chamberlain Walker Economics (2017);
 - d. HBF Paper (2016);
 - e. *'Housing Delivery on Strategic Sites'* by Colin Buchanan Report (2005);
 - f. *'Urban Extensions: Assessment of Delivery Rates'* by Savills (2013);
 - g. *'Factors Affecting Housing Build-out Rates'* by University of Glasgow (2008)
- 3.4 The annual reports and trading update statements have also been reviewed for the following national housebuilders:
- a. Avant Homes;
 - b. Barratt/ David Wilson Homes;
 - c. Bellway Homes;
 - d. Bovis Homes;
 - e. CALA Homes;
 - f. Countryside Properties;
 - g. Crest Nicholson;
 - h. Kier Group;
 - i. Linden Homes;
 - j. Miller Homes;

- k. Persimmon Homes;
 - l. Redrow Homes;
 - m. Taylor Wimpey.
- 3.5 Local evidence in Mid Suffolk has also been reviewed on the delivery rates and lead-in times of 10 sites for which the information was available. These sites vary in size from 22 dwellings up to 276 dwellings.
- a) National Evidence on Housing Delivery on Housing Sites**
- (i). Letwin Review (2018)
- 3.6 The Letwin Review was published in October 2018 and was commissioned by the Chancellor of the Exchequer in Autumn 2017 to “explain the significant gap between housing completions and the amount of land allocated or permissioned in areas of high housing demand and make recommendations for closing it”.
- 3.7 The Letwin Review is supported by draft analysis published in June 2018. This identifies that ‘absorption rates’ are the fundamental driver of build-out rates.
- 3.8 The absorption rate appears to be largely determined by the housing type (including size, design, context and tenure) and price of the new home. Meaning that house builders are in a position to exercise control over the sales rate, as rivals are limited in their opportunity to offer customers different types of housing or tenure. For example, when a large housebuilder occupies all/a large proportion of a site, the size and style of the home will be fairly homogeneous, and so demand can be limited. Whereas on a large site, even slight variations in the housing size, style (and context), and physical location on a site, can act to increase demand and absorption rates, leading to higher build out rates.
- 3.9 The report also identifies the types of tenure on offer are critical, and that the rate of completion of ‘affordable’ and ‘social rented’ homes is constrained by the absorption of market rate houses. This is because ‘affordable’ and ‘social rented’ homes are cross subsidised by the sale of market rate houses, thereby when the absorption of market rate houses is limited by the character and size of the homes, the cross subsidy for the non-market-rate housing is limited and the build out rates are reduced.
- 3.10 There is also evidence that smaller sites build out quicker than larger sites. The theory underpinning this is that the market absorption rate for a home is largely location-specific, and there is a limited depth of a market for a given house size, type, and location. Consequently, multiple smaller sites are able to explore multiple different housing markets and therefore the absorption rate is not as limited and build out rates are not constrained.
- 3.11 The Letwin Review is focused upon the delivery of large sites, at present there are no such sites in the supply for Mid Suffolk district. The relevance of these findings is limited.
- (ii). ‘Start to Finish How Quickly do Large-Scale Housing Sites Deliver?’ By NLP (November 2016)
- 3.12 “Start to Finish How Quickly do Large-Scale Housing Sites Deliver?” was published in November 2016 by Nathaniel Lichfield and Partners (NLP). It is a well-regarded national level assessment of housing delivery. This report looks at sites of all sizes, but

specifically focuses on 500+ dwellings. The headline points were as follows (page 3):

- (i). 70 large sites were assessed;
- (ii). 3.9 years was the average lead in time for large sites prior to the submission of the first planning application;
- (iii). 6.1 years was the average planning approval period of schemes of 2,000+. The average for all large sites is circa 5 years;
- (iv). 161 dpa is the average annual build rate for a scheme of 2,000+ dwellings;
- (v). 321 dpa is the highest average annual build rate of the schemes assessed, but this site has only delivered for three years;
- (vi). Higher build out rates can be delivered in stronger markets;
- (vii). Delivery does not increase in proportion to the size of the site. A site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size.

3.13 In respect of lead-in times the research states (page 8):

“Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations”

3.14 A summary of the detailed findings of this report are outlined in table 4.

(iii). *‘The Role of Land Pipelines in the UK Housebuilding Process’ by Chamberlain Walker (2017)*

3.15 A report commissioned by Barratt Developments was undertaken by Chamberlain Walker Economics and was published in September 2017 and entitled *“The Role of Land Pipelines in the UK Housebuilding Process”*. This report looked at the supply of land required by housebuilders in order to maintain and grow the number of homes they build. It focused on sites of more than 20 dwellings and have identified four phases of delivery from pre-application phase to delivery of first completions. The phases are as follows:

Table 3. The Development Pipeline and Its Four Phases

| | | |
|--------------------------------------|--|--|
| A | Pre-Application (e.g. landownership and control, market conditions, planning context including allocation in Local Plan, preparing for planning application and extent of required community consultation) | = 1.2 to 2.1 years |
| B | Application to Permission (e.g. inclusion in Local Plan, negotiation of S106, scale of development, performance of LPA) | = 0.5 to 0.8 years |
| C | From permission to start on site (e.g. landownership, ground works, site infrastructure, discharge of planning conditions) | = 0.6 to 1.0 years New estimate = 1.7 years (21 months) |
| D | Under construction (build out) (e.g. constraints of speed of construction, site size and market absorption, infrastructure requirements). | Previous estimate = 1.1 to 2.3 years New estimate = 2.3 years (27 months) |
| Total development pipeline (A+B+C+D) | | Total Previous estimate = up to 5.8 years New estimate = up to 6.6 years |

Source: Chamberlain Walker Economics Report, Table 2, page 15

- 3.16 The research identifies that the 'post planning permission' stages (C+D) for developments of 20 homes or more has increased markedly to 4.0 years on average from grant of detailed planning permission to site completion, compared to the earlier Local Government Association (LGA) estimates of 1.7 to 3.2 years. This is considered likely to be the result of an increased burden of pre-commencement conditions (Phase C) and an increased reliance on 'large sites' that take longer to build out (Phase D) (page 3).
- 3.17 This 21-month period is consistent with the view of housebuilders that whilst the period taken to gain planning permission has remained broadly unchanged over the last decade or so, post-planning consent delays have grown. This increase may be attributed to the following:
- a. 55.5% of all planning permissions are held by non-builders, leading to the issue of site disposal (to a builder);
 - b. The expiration of a judicial review period;
 - c. Signing of a S106 agreement;
 - d. The number of pre-commencement conditions being attached to planning permissions is increasing, and this is increasing the time taken to discharge such conditions;
 - e. Land held under an options agreement;
 - f. A change in market conditions, for example, an economic downturn can adversely affect sales rates and revenue. This requires the development timescales to be reviewed;
 - g. External factors such as the requirement for provision of local infrastructure.
- (iv). HBF Paper (2016)
- 3.18 This research follows on from the Home Builders Federation (HBF) research earlier in 2016 that undertook a survey of 300 large sites in February and March 2016 in response to the Government's criticism that large sites are only delivering some 48 dwellings a year, (page 1).
- 3.19 In the HBF research, "Large sites" were defined as those with at least 350 dwellings in total, a lower site threshold than the NLP research. In 2015, the average sales on all sites (including start-ups, on-going, tail-ends) was 70 dwellings a year (page 1). In order to omit the low levels of sales that occur at the start and end of a site's delivery and to get an average for when the site was delivering at its best, the research attempted to exclude the lead-in and tail-out elements of a site build-out (penultimate slide). To do this, the research excluded those years from the calculation, of the average those years, in which a site delivered of less than 10 dwellings, less than 20 dwellings and less than 35 dwellings a year. By excluding these years of lower sales rates, the average rate of sales naturally increases, and the results are as follows:
- 70 sales a year – average across all sites;
 - 85 sales a year – average on all sites with 10 or more sales a year:
 - 88 sales a year – average on all sites with 20 or more sales a year:
 - 95 sales a year – average on all sites with 30 or more sales a year:

(v). 'Housing Delivery on Strategic Sites' by Colin Buchanan Report (2005)

3.20 The earliest work by Colin Buchanan ("*Housing Delivery on Strategic Sites*") was undertaken prior to the recession (2005) and considered delivery rates on strategic sites, mainly within the East of England (paragraph 2.1.5), and reviewed delivery rates on the basis of the size of the site. This research suggests the delivery of an average of 200 dwellings a year on all strategic sites over 1,000 dwellings and that the time between the submission of an application and first construction is 5 years (paragraphs 3.5.2 and 3.5.5). The full details of the report are summarised in table 4.

(vi). 'Urban Extensions: Assessment of Delivery Rates' by Savills (2013)

3.21 This report was commissioned by Barratt Homes and assesses the delivery rates of urban extensions. It tracks 84 urban extensions through the planning system over the last 25 years and focuses on sites of 500+ dwellings.

3.22 More recent evidence relating to urban extensions suggest a build rate of just over 100 dwellings a year, although this has risen to 120 per year in 2013 (page 2).

3.23 It should also be noted that the timescale between submission of outline and completions on site is now averaging about three years (page 1).

(vii). 'Factors Affecting Housing Build-out Rates' by University of Glasgow (2008)

3.24 In terms of the delivery on all sites, the research undertaken by the University of Glasgow for CLG Housing Markets and Planning Analysis Expert Panel – "Factors Affecting Housing Build-out Rates" published in February 2008 by Professor David Adams and Dr Chris Leishman, considered pre-recession evidence and stated at paragraph 2.5 that:

'Most builders generally appear to set a target of between 40 and 80 units built and sold from each outlet annually.'

3.25 In this context, it may be noted that the Savills report concluded in paragraph 6.2 that:

'The typical strategy of most companies who participated in the research was to aim for a build and sales rate of about one unit per week on greenfield sites and slightly higher than this on brownfield sites. Although this confirms anecdotal evidence, it should certainly not be taken as a 'natural build-out rate'. Rather it reflects the particular institutional structure of the British house building industry in which fierce competition for land then requires controlled and phased release of new development to ensure that the ambitious development values necessary to capture land in the first place are actually achieved when new homes are eventually sold...'

3.26 Table 4 below summarises each of these publications and seeks to draw comparisons between each.

Table 4. Summary of Research on Delivery Rates

| | Average number of months between events | | | | | Submission of App to start on site (years) | Average delivery | Delivery per developer |
|---|---|--------------------|------------------------------|------------------------------------|------------------------|--|------------------|------------------------|
| | Approval of outline | Conclusion of S106 | Approval of Reserved Matters | Site prep & signing off conditions | Total number of months | | | |
| Sites of 500+ Dwellings | | | | | | | | |
| Colin Buchanan (all sites) | | | | | | 5yrs | 188 | |
| Colin Buchanan (sites of 1,000 to 1,999 dwellings or more) | | | | | | 4.7yrs | 101 | |
| Colin Buchanan (sites of 2,000 to 1,999 dwellings or more) | | | | | | 5yrs | 189 | |
| Colin Buchanan (sites of 3,000 dwellings or more) | | | | | | 5.5yrs | 330 | |
| University of Glasgow | | | | | | | | 55 |
| Hourigan Connolly | 24 | 21 | 18 | 12 | 75 | 6.25yrs | 107 | 35 |
| Savills 2014 all sites | 12 | 15 | 15 | 6 | 48 | 4yrs | 110 | |
| Savills 2014 (post 2010) | 11 | 6 | 11 | 4 | 32 | 2.7yrs | | |
| NLP 2016 (sites of 500 to 999) | | | | | | 5.3 – 6.9yrs | 70 | |
| NLP 2016 (sites 1,000 to 1,499) | | | | | | 5.3 – 6.9yrs | 100 | |
| NLP 2016 (sites of 1,500 to 1,999) | | | | | | 5.3 – 6.9yrs | 135 | |
| NLP 2016 (sites more than 2,000) | | | | | | 5.3 – 6.9yrs | 161 | |
| Sites of Less than 500 Dwellings | | | | | | | | |
| Home Builders Federation Research (sites of 350+2015) | | | | | | | 70 (95) | |
| NLP 2016 (sites less than 100) | | | | | | Approx. 2.8yrs | 27 | |
| NLP 2016 (sites 100 to 499) | | | | | | Approx. 4.1yrs | 60 | |
| Barratt Report (Chamberlain Walker Economics) 2017 (sites more than 20 dwellings) | | | | | | 2.5yrs | | |

Sources: Colin Buchanan - *Housing Delivery on Strategic Sites 2005 (table 1)*

University of Glasgow - *(CLG housing markets and Planning Analysis Expert Panel) Factors affecting build out rates (Table 4)*

Hourigan Connolly - *An interim report into the delivery of Urban Extensions 2013 (Summary of individual case appendices 4 to 12)*

Savills - *Urban Extensions Assessment of delivery rates*

Home Builders Federation *Planning Policy Conference presentation by John Stewart 2016*

NLP- *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? 2016 completions estimated from Fig 7 page 1*

Chamberlain Walker Economics - *“The Role of Land Pipelines in the UK Housebuilding Process” (September 2017)*

b) Completions per Outlet from National House Builders

3.27 Most national housebuilders prepare and publish annual performance reports. Within these, the previous years performance results are published. For some instead of delivery rates, a sales rate is given. The levels of completions can be predicted against the average rate of sales or completions per active outlet for the housebuilder concerned extracted from their own annual accounts. The following is a summary of national housebuilder:

- Persimmon: 8,072 new homes legally completed in first 6 months of 2018 with an average of 375 active sites. This equates to 22 sales per outlet in the first 6 months and can expect approximately **44 sales per outlet per year** across the financial year based on these results (Half Year Results 2018).
- Crest Nicholson: 1,251-unit completions in first 6 months of 2018 with 56 full year equivalent outlets. Therefore at least 2,502-unit completions could be expected in full year which results in approximately **44 completions per outlet per year** across the financial year (Half Year Results 2018).
- Taylor Wimpey: Current order book total excluding joint ventures of 9,783 homes with an average of 275 outlets in the year to date. Across the year that would equate to a sales rate of **36 sales per outlet per year** (Trading Statement November 2018).
- Barratt/David Wilson: 12,903 units total forward sales in the year to date with operation from an average of 365 active outlets. This equates to **35 sales per outlet per year** (Trading Update October 2018).
- Bovis: 1,580 completions in first half of 2018 including affordable housing completions with operations from 86 active sales outlets. This equates to approximately **37 completions per outlet per year**.
- Bellway: 10,307 homes sold (including affordable housing) in financial year with 247 active outlets. This equates to **42 sales per outlet per year** (Annual Report 2018).
- Redrow: legal completions at 5,913 including JV with 124 outlets across financial year. This equates to **48 sales per outlet per year** (Full Year Results Presentation 2018).
- Miller Homes: 0.77 net reservations per outlet per week. This equates to **40 sales per outlet per year** (Half Year Results 2018).
- Countryside Properties: Net reservation rate of 0.80 from 60 sales outlets. This equates to **42 sales per outlet per year** (2018 Full Year Results)
- Linden Homes: 3,442-unit completions in the financial year across an average of 85 active sites. This equates to **40 completions per outlet per year** (Galliford Try Full Year Results Statement 2018).

- Kier Group: Sales rate of 0.7 units per week per trading site. This equates to **36 sales per outlet per year** (Annual Report 2018).
- Avant Homes: 1,902 total completions across an average of 42 selling sites. This equates to **45 completions per outlet per year** (2018 Full Year Results).
- CALA Homes: Private sales per site per week equates to 0.62. This is **32 sales per outlet per week** (Full Year Update 2018).

3.28 Sales rates are a reasonable indicator of completions if completion data is not available. Although it is noted that sales tend to run ahead of actual build rates (excluding Bovis, Avant, Crest Nicholson and Linden Homes who record actual completions as new home owners tend to buy off plan and wait for dwellings to be completed. In this regard they are likely to be higher than the actual rates of completion. Also, as these are sales, they do not take into account the provision of affordable housing (except Bovis and Bellway). Therefore, whilst delivery rates will be lower than these sales rates, the final rates of completions on sites may be increased by the provision of affordable housing. As such, these rates are in general conformity with the conclusions of other research regarding the likely rates of delivery referred to earlier in terms of larger sites.

3.29 These examples of national housebuilding suggest delivery in the region of **40dpa per active developer, per site.**

c) Local Market Evidence- Past Delivery

3.30 Since the base date of the emerging Local Plan in 2014, the Council have recorded 1,451 net completions of which 1,008 comprise net completions on all windfall sites and 291 net affordable housing completions.

Table 5. Net Completions by Type 2014-2018, Annual Monitoring Report 2017/18, Table 10

| AMR Year | Total Net Completions | No. of Windfall Completions ¹ | % of Net Completions | Net Affordable Completions | % of Net Completions |
|--------------|-----------------------|--|----------------------|----------------------------|----------------------|
| 2017/18 | 426 | 292 | 69% | 114 | 27% |
| 2016/17 | 305 | 230 | 75% | 53 | 17% |
| 2015/16 | 304 | 240 | 79% | 78 | 26% |
| 2014/15 | 416 | 246 | 59% | 46 | 11% |
| Total | 1,451 | 1,008 | 69% | 291 | 20% |

3.31 The Council have also looked at past delivery rates on 14 sites within the district to provide comparable context to the national evidence outlined earlier in the section. It is acknowledged this is a limited sample size, but this was due to the limited availability of the information. Table 6 and 7 below demonstrate that sites over 100 dwellings are delivering on average 76dpa whilst sites of less than 100 are delivering

¹ Includes residential garden land

in the region of 37dpa.

Table 6. Local Evidence on Delivery Rates of Sites Over 100 Dwellings

| PP Ref (FULL/OUT/REM) | Site Address | Site Capacity | Dev. Progress | Total Comps | No. of Days between First and Latest/Last Completion | Years Under Construction (No. of Days/365) | Average Comps Per Annum (Total Comps/Yearly Decimal) |
|-----------------------|---|---------------|---------------|-------------|--|--|--|
| M/2722/13/FUL (FULL) | Land at Chilton Leys | 215 | U/C | 163 | 1,053 | 2.9 | 57dpa |
| M/3153/14/FUL (FULL) | Needham Chalks Ltd | 266 | U/C | 21 | 69 | 0.2 | 111dpa |
| M/3310/14/FUL (FULL) | Former Masons Cement Works | 276 | U/C | 225 | 1,084 | 3.0 | 76dpa |
| M/3918/15/REM (REM) | Former Grampian/Harris Factory, St Edmund Drive | 190 | U/C | 49 | 302 | 0.8 | 59dpa |
| Average: 76dpa | | | | | | | |

Table 7. Local Evidence on Delivery Rates of Sites Under 100 Dwellings

| PP Ref (FULL/OUT/REM) | Site Address | Site Capacity | Dev. Progress | Total Comps | No. of Days between First and Latest/Last Completion | Years (No. of Days/365) | Average Comps Per Annum (Total Comps/Years) |
|-----------------------|--|---------------|---------------|-------------|--|-------------------------|---|
| M /1492/15/FUL | Land W of Farriers Rd, Edgecomb Park, Hybrid App (Phase 1) | 75 | U/C | 477 | 1.3 | 31 | 24dpa |
| M /0210/15/FUL | Land off Kingfisher Drive/Chalk Hill Rise | 23 | Comp | 403 | 1.1 | 23 | 21dpa |
| M/0669/08/OUT | Chapel Farm, Off Mill Street | 23 | Comp | 400 | 1.1 | 23 | 21dpa |
| M /0254/15/OUT | GR Warehousing Site, Old Station Rd | 56 | U/C n | 403 | 1.1 | 37 | 34dpa |
| M/2910/11/FUL | Former Unilever Site, High Street, Needham Maltings | 90 | Comp | 707 | 1.9 | 90 | 46dpa |
| M /0958/16/FUL | 9 Finborough Road (off Iliffe Way) | 22 | Comp | 407 | 1.1 | 22 | 20dpa |
| M/1662/14/FUL | Land Adjoining Roundabout, Bury Road | 27 | U/C | 237 | 0.6 | 17 | 26dpa |
| M/2742/14/FUL | Land at St Marys Road-Phase 2 | 62 | Comp | 432 | 1.2 | 62 | 52dpa |
| M/3112/15/OUT | Land between Gipping Road and Church Road (Phase 1) | 75 | U/C | 196 | 0.5 | 47 | 88da |
| M/2178/14/FUL | Tranche 2, Steeles Road | 34 | Comp | 321 | 0.9 | 34 | 39dpa |
| Average: 37dpa | | | | | | | |

d) Local Market Evidence- Lead-In Times

3.32 In respect of lead-in times, the following tables consider the past lead-in times of 18 sites in the district. In summary, for sites of 100+ dwellings there is an average lead-in time from submission of application to first completion recorded on site of 2.9 years and for sites less than 100 dwellings, this is 2.6 years. The overall average is 2.8 years which is in line with the national evidence on lead-in time detailed early on in this section of the report (section 3a).

Table 8. Summary of Local Evidence on Lead-in Times

| Site Size | Lead-In Time | Sample Size |
|-------------------|---------------|-------------|
| 0-99 dwellings | 2.6yrs | 14 |
| 100-499 dwellings | 2.9yrs | 4 |
| Average | 2.8yrs | |

3.33 The tables below provide evidence as to how the lead-in times have been calculated.

Table 9. Local Evidence of Lead-In Times of Sites Over 100 Dwellings

| PP Ref | Parish | Site Address | New dwellings | Submission of 1 st Application | First Recorded Completion | Days between Submission of Application and Start on Site | No. of Years (Lead-In Times) |
|----------------|-----------------|--|---------------|---|---------------------------|--|------------------------------|
| M /2722/13/FUL | Stowmarket | Land at Chilton Leys | 215 | 16/09/2013 | 11/11/2015 | 786 | 2.2 |
| M /3153/14/FUL | Needham Market | Needham Chalks Ltd | 266 | 01/10/2014 | 19/01/2018 | 1206 | 3.3 |
| M /3310/14/FUL | Great Blakenham | Former Masons Cement Works | 276 | 17/10/2014 | 01/03/2016 | 501 | 1.4 |
| M /3918/15/REM | Elmswell | Former Grampian/Harris Factory, St. Edmund Drive | 190 | 26/03/2013 | 01/12/2017 | 1711 | 4.7 |
| Average | | | | | | | 2.9 years |

Table 10. Local Evidence of Lead-In Times of Sites Under 100 Dwellings

| PP Ref | Parish | Site Address | New dwellings | Submission of 1 st Application | First Recorded Completion | Days between Submission of Application and Start on Site | No. of Years (Lead-In Times) |
|----------------|-----------------|--|---------------|---|---------------------------|--|------------------------------|
| M /1492/15/FUL | Combs | Land W of Farriers Rd, Edgecomb Park, Hybrid App (Phase 1) | 75 | 23/04/2015 | 06/12/2016 | 593 | 1.6 |
| M/1008/11/FUL | Badwell Ash | Land adj to Donard Back Lane, Badwell Ash | 17 | 18/03/2011 | 01/04/2018 | 2571 | 7.0 |
| M/2792/13/FUL | Eye | Hartismere Hospital, Castleton Way | 60 | 20/09/2013 | 28/09/2015 | 738 | 2.0 |
| M /0210/15/FUL | Great Blakenham | Land off Kingfisher Drive/Chalk Hill Rise | 23 | 20/01/2015 | 21/02/2017 | 1066 | 2.9 |
| M /0254/15/OUT | Mendlesham | GR Warehousing Site, Old Station Rd | 56 | 22/01/2015 | 15/12/2017 | 1058 | 2.9 |
| M/2910/11/FUL | Needham Market | Former Unilever Site, High Street, Needham Maltings | 90 | 30/08/2011 | 19/04/2013 | 598 | 1.9 |
| M /0958/16/FUL | Stowmarket | 9 Finborough Road (off Iliffe Way) | 22 | 23/02/2016 | 02/02/2017 | 345 | 0.9 |
| M/1662/14/FUL | Stowmarket | Land Adjoining Roundabout, Bury Road | 27 | 23/05/2014 | 24/04/2018 | 1432 | 3.9 |
| M/0683/15/FUL | Stowmarket | 115 Ipswich Street (Joker's Night Club) | 25 | 20/02/2015 | 24/10/2018 | 1342 | 3.7 |
| M/1850/13/FUL | Stowmarket | Land at Village Centre, Creting Rd East | 70 | 25/01/2013 | 31/03/2015 | 795 | 2.2 |
| M/2279/13/FUL | Stowmarket | Land at St Mary's Road, Stowmarket | 14 | 19/08/2013 | 14/05/2015 | 546 | 1.5 |
| M/2742/14/FUL | Stowmarket | Land at St Marys Road-Phase 2 | 62 | 26/08/2014 | 18/11/2016 | 603 | 1.7 |
| M/3112/15/OUT | Stowupland | Land between Gipping Road and Church Road (Phase 1) | 75 | 27/08/2015 | 01/08/2018 | 1070 | 2.9 |
| M/2178/14/FUL | Woolpit | Tranche 2, Steeles Road | 34 | 08/07/2014 | 23/03/2016 | 624 | 1.7 |
| Average | | | | | | | 2.6years |

e) Conclusion on Potential Delivery Rates and Lead-In Times

- 3.34 The local evidence available does not exceed sites of 500 dwellings and therefore all comparisons to national and housebuilder evidence is compared to a similar benchmark. Our final assessment below compares the local evidence to those pieces of national evidence which provides comparable figures of sites less than 500 dwellings.
- 3.35 In respect of delivery rates, the local evidence suggests annual delivery on sites could be in the region of 56dpa (table 6 & 7). Whilst the national evidence of sales or delivery rates by housebuilders suggests delivery rates in the region of 40dpa. The NLP research suggests delivery rates on sites of between 0-500 dwellings to be in the region of 27-60dpa.
- 3.36 Local evidence could lead to a conclusion that a delivery rate of 56dpa should be used, however given the relatively small sample size and lower figures from national housebuilders and national research, a delivery rate of **40dpa** is considered to be an appropriate rate of delivery on individual sites. As such, in line with paragraph 047 of the PPG, 40dpa is a reasonable rate of delivery based upon clear evidence. If there is local evidence that a housebuilder has a track record of delivering above this rate of delivery, the higher rate will be used (such is the case for Taylor Wimpey at Chilton Leys, appendix 3a).

Table 11. Comparison of National, Local and Housebuilder Evidence on Delivery Rates on Sites of Less Than 500 dwellings

| Type | Lower | Mean | Higher |
|------------------------------------|-------|-------|--------|
| Local Evidence (MSDC) ² | 20dpa | 56dpa | 111dpa |
| Housebuilder Evidence ³ | 32dpa | 40dpa | 48dpa |

- 3.37 Table 12 provides a summary of local evidence compared with national evidence on lead-in times. The lead-in times are calculated from the submission of the application to start on site/first completion being recorded.
- 3.38 This demonstrates that the average lead-in time considering local and national evidence is between 2.6-2.9 years the midpoint 2.7 years has been used as a lead-in time and applied to sites. A lead-in time of **2.8 years** has been applied to sites not yet commenced in the Mid Suffolk district unless there is evidence to suggest otherwise. This is considered more conservative than the evidence on lead-in times for Mid Suffolk as the sample is only based on 18 sites, but 2.8 years is also the mid-range when compared to the Chamberlain Walker and NLP research (table 12).
- 3.39 The lead-in time covers the following stages of the development:
 - a. Submission of application to permission (e.g. inclusion in local plan, negotiation of S106, scale of development and performance of LPA);
 - b. Permission to Start on Site (e.g. landownership, ground works, site infrastructure, discharge of planning conditions);

² Section 4(c) of this Report

³ Section 4(b) of this Report



- c. Construction phase to First Completion (e.g. constraints of speed of construction, site size, market absorption, infrastructure requirements).

Table 12. Comparison of National and Local Evidence on Lead-In Times on Sites Less than 500 dwellings

| Type | Average Lead-In Time |
|---|----------------------|
| Local Evidence (MSDC) ⁴ | 2.6 years |
| National Evidence (NLP, 2016) ⁵ | 2.8-4.1 years |
| National Evidence (Chamberlain Walker Economics 2017) | 2.5 years |
| Average | 2.5-2.9 years |

⁴ Section 4(c) of this Report

⁵ Table 2 of this Report

4.0 METHOD

4.1 This section sets out the process used and the different criteria and assumptions which are applied in the calculation of the five-year land supply.

a) Method of Consultation

4.2 The draft Position Statement consultation ran for a 6-week period from 17th January 2019 to 28th February 2019.

4.3 The consultation document was published on a dedicated project webpage on the Babergh/Mid Suffolk Councils website with signposting links from the AMR and Housing pages. Emails notifying stakeholders of the consultation and inviting comments were sent to the following parties:

- a. Council Members
- b. Parish Councils
- c. Planning Agents
- d. Developers
- e. Neighbouring Authorities
- f. Infrastructure Providers

4.4 Details of the consultation were also sent to the following press offices:

- a. The East Anglian Daily Times
- b. The Stowmarket Mercury
- c. The Ipswich Star
- d. The Bury Free Press

b) Initial Identification of Sites

4.5 A list was collated of all sites with planning permission at 30th September 2018. This list was then divided into the following categories:

- a. Sites Under Construction;
- b. Sites with Full Planning Permission;
- c. Sites with Outline Planning Permission;
- d. Sites under 10 Dwellings in Size.

4.6 Completions as of 30th September 2018 have been recorded to avoid double counting.

4.7 A planning history and building control records search was undertaken on all sites to check the accuracy of sites included in the supply and those recorded as completed or expired were removed from the supply. Contact was also made with all known landowners/agents/developers to confirm the status of individual sites which had planning permission.

4.8 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.

- 4.9 The conversations with developers referred to the evidence requirements in the Framework and PPG and officers asked for details of the progress of the development towards commencement, anticipated build-out rates and any issues that could stall or delay expected delivery. Where, possible, Memoranda of Understanding were signed to reinforce the delivery evidence which existed at 1st October 2018.
- 4.10 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.
- 4.11 As a matter of judgement permissions which are soon approaching expiry have been removed from the five-year supply.

c) Assumptions on Lead-In Times and Delivery Rates

- 4.12 Local and national evidence on delivery rates and lead-in times have been reviewed to identify a lead-in time of 2.8 years from submission of a planning application to first completion/start on site and an annual delivery rate of 40dpa.
- 4.13 The assumptions on delivery rates were identified through the following steps;
- a. A review of national evidence paying particular attention to the NLP Research (the local evidence available does not exceed sites of 500 dwellings and NLP is the only piece of national research which identifies delivery rates in line with the size of sites in Mid Suffolk) which suggests delivery rates on sites between 0-500 dwellings in size to be in the region of **27-60dpa**;
 - b. A review of the levels of sales completions/actual completions per active outlet for 13 national housebuilders. This suggests completions in the region of **40dpa**;
 - c. A review of the delivery of 14 sites in Mid Suffolk ranging from 23-276 dwellings in size. These sites were split into two categories; Under 100 dwellings and Over 100 dwellings in size. This was calculated by identifying the total number of completions to date divided by the number of years (to the decimal) since the first completion was recorded on site. This identified a delivery rate of 76dpa on sites over 100 dwellings in size and 37dpa on sites of less than 100 dwellings in size. The mean rate of delivery is **56dpa**.
- 4.14 An assumption of **40dpa** has been applied to the housing trajectory unless there is evidence to suggest otherwise. For example, Chilton Leys (FUL Ref: M /2722/13/FUL and OUT Ref: M /5007/16/OUT) is currently delivering at 55dpa and Taylor Wimpey, the developer on the site, outline in their MoU that they will deliver 50dpa, therefore 50dpa has been applied to this site, as clear evidence supports the higher rate.
- 4.15 The sample size for lead-in times and delivery rates is small (18 sites in total), however the sites selected were based on available data in the past 3-5 years for which there was a record of all of the following:
- a. Corresponding date of approval;

- b. Known start on site date;
- c. Known completions data.

4.16 With regard to lead-in times, these were identified through the following steps:

- a. A review of national evidence paying particular attention to the NLP Research and the Chamberlain Walker Economics Research which looks at sites of comparable sizes to those identified in Mid Suffolk. These identifies a period of **2.8-4.1 years and 2.5 years** respectively from submission of the planning application to first completion/start on site;
- b. A review of the lead-in times of 18 sites in Mid Suffolk ranging from 14-276 dwellings in size. These sites were split into two categories; under 100 dwellings and over 100 dwellings in size. The lead-in times were calculated from the date the planning application was first submitted to the date the first completion was recorded. This identified an average lead-in time of **2.8 years** for both categories;
- c. The average lead-in time when considering local evidence and national evidence is 2.5-2.9 years (see table 12).

4.17 An assumption of **2.8 years** has been applied to sites in the housing trajectory unless there is evidence to indicate a shorter lead-in time or where due to a prolonged time in determining the planning application, 2.8 years has already passed. For the latter, a lead-in time of 2.8 years was added from the date of approval.

d) Sites Under Construction

4.18 For those sites in the supply which are currently under construction, the first step was to identify the number of units completed by 30th September 2018. For sites where dwellings have already been completed, 40dpa has been added from year 1 unless there is evidence to suggest a different rate of delivery.

4.19 There are some sites which are under construction that have not yet recorded completions. These have been assumed to deliver first completions in year 1 at a rate of 40dpa unless evidence suggests otherwise.

e) Sites with Full Planning Permissions

4.20 For sites in the supply with full planning permission, the following steps were taken:

- a. Check for any potentially expired permissions.
- b. Planning history search to identify if all pre-commencement conditions have been discharged;
- c. Contact was also made with all known landowners/agents/developers to confirm the status of individual sites which had planning permission;
- d. The application of 2.8 years lead-in times from the date of approval and delivery rates of 40dpa, unless the estimated lead-in time period has already passed (i.e. the application was submitted more than 2.8 years ago but permission was only granted in 2018) but permission has only recently been granted. In these cases, the lead-in time has been applied to the date of approval, which effectively results in a longer than 2.8-year lead-in time.

- 4.21 It should be noted that for Chilton Leys (OUT Ref: M/5007/16/OUT), an MoU has been provided by Taylor Wimpey (c/o Boyer Planning) who outline current progress on each of their sites in the district. This document provides the most up to date number of completions at Chilton Leys to the end of October 2018. However, as the land supply period commences from 1st October 2018, the number of completions has been divided by 10 (no. of months between January and October) and multiplied by 9 (no. of months prior to start of monitoring year) to identify the number of completions on site at Chilton Leys. Therefore, 158 completions recorded on site at 1st October 2018, are an estimation, based on available information.
- e. 46 units recorded as completed between January and October 2018;
 - f. $46/10$ months = 4.6 dwellings per month;
 - g. 4.6×9 months = 41 dwellings;
 - h. 117 completions recorded at December 2017 plus 41 dwellings recorded as completions between January-October 2018 = 158 dwellings completed on site.
- f) Sites with Outline Planning Permissions**
- 4.22 A planning history search was undertaken for sites with outline planning permission. Following this, six sites were identified as having clear evidence that completions would be delivered on site within 5 years as required by the definition of 'deliverable' at page 66 of the 2018 Framework.
- 4.23 Four sites had reserved matters applications submitted by housebuilders (three nationals, and one regional) and validated by the Council before 1st October 2018 and have been included in the five-year land supply on the basis this is clear evidence completions will be delivered on site within five years. It is noted that since 1st October 2018, these reserved matters applications have been approved, reaffirming the clear evidence these sites will deliver completions in the five-year period.
- 4.24 Memorandums of Understanding have been prepared and signed by the site developer (contained at appendix 3) for the following sites:
- a. Land north of Chilton Leys, Stowmarket;
 - b. Land west of Ixworth Road, Thurston;
 - c. Land on the North Side of Norton Road, Thurston;
 - d. Land to the east of Turkeyhall Lane and to the North of North Close, Bacton.
- 4.25 MoU's outline the anticipated build rates for the site and comprise of either rates by calendar year (i.e. 2019, 2020, 2021) or by year commencing 1st October 2018 to year ending 30th September 2019. Where delivery rates have been confirmed as calendar year, these have been adjusted to reflect (appendix x).
- g) Sites under 10 Dwellings**
- 4.26 For small sites in the supply a full planning history search was undertaken which removed the following types of sites:
- a. Sites with no extant planning permission;
 - b. Sites with planning permission for holiday lets or non C3 Class Uses;

- c. Sites with permission superseded by a non-residential permission.;
- d. Sites already completed.

4.27 The Council directly contacted the agent or applicant on sites with an upcoming or passed expiry date, and where there is no record of commencement and/or the agent or applicant could not confirm commencement have been removed from the supply.

h) Lapse Rate

4.28 No lapse rate has been applied to the Council's five-year land supply calculation.

4.29 In the *Wokingham v SoSCLG and Cooper Estates Strategic Land Limited (2017) EWHC 1863* High Court judgement, it was concluded that the use of a 10% lapse applied to the whole of the estimated supply was not necessary given the application of a 20% buffer for the same purpose. The Judge determined that an increase to the housing supply by 20% *"where there has been a record of persistent under delivery of housing"* in each case in order to *"provide a realistic prospect of achieving the planned supply"* performed the same function as the application of a lapse rate. It was judged that there was no reason to apply a lapse rate to the whole of the estimated supply as well as a 20% buffer. The Council previously applied a 10% lapse rate to all sites under construction or that had planning permission. The revisions to the definition of 'deliverable' mean that all sites in the five-year supply have planning permission and therefore a lapse rate would be relevant to the entire five-year land supply. This is no longer considered appropriate and has not been applied.

i) Windfall

4.30 In addition to these 4 categories of sites, an assessment of windfall has been undertaken to determine whether the Council can rely on a contribution from windfall sites in the five-year period. The methodology is detailed in section 6. There is no detailed data records held by the Council prior to 2014 which accounts for only 4 years of analysis.

j) Specialist Accommodation

4.31 The Council have only recently begun monitoring specialist accommodation uses such as care homes and sheltered housing. There are no monitoring records for such types of accommodation and have therefore not been included in the supply.

5.0 SITE ASSESSMENTS

5.1 Section 4 of this report identifies the process undertaken in the assessment of Mid Suffolk's housing land supply and the process for removing or including sites when undertaking a review of the evidence. This section goes into detail on a site by site basis providing the justification for including or excluding sites.

a) Sites with Detailed Planning Permission

5.2 Following the assessment of all sites with detailed planning permission, the following sites have been removed from the five-year supply as these permissions are due to expire shortly and there is no evidence or indication that they will be implemented:

- a. Grove Farm, Queen Street (44 dwellings);
- b. Former Scotts/Fisons site, Paper Mill Lane (74 dwellings)
- c. Whitton Park Retirement Home (19 dwellings)

b) Sites with Outline Planning Permission

5.3 The following list of sites have outline planning permission and in accordance with the Framework's definition of 'deliverable' have been included in the Council's five-year housing land supply. It is considered there is clear evidence completions will be delivered on site within 5 years.

5.4 These sites had clear evidence at 30th September 2018 to justify their inclusion in the five-year land supply. MoU's were prepared between November 2018 and January 2019 to support the clear evidence already available at the start of the monitoring year.

Table 13. Sites with Outline Planning Permission Considered Deliverable

| Site Address | Planning Reference | Type of Application | Site Capacity | 5Yr Supply | Reason for inclusion in 5 Year Supply |
|----------------------------|--------------------|---------------------|---------------|------------|--|
| Land North of Chilton Leys | M/5007/16/OUT | Outline | 600 | 200 | <p>Outline planning permission was granted on 5th July 2018</p> <p>The site is owned by Taylor Wimpey UK Limited a national house builder with a good track record of housing delivery.</p> <p>A reserved matters application for 175 dwellings was submitted in July 2018 by Taylor Wimpey, shortly after the outline application was granted.</p> <p>The Council were aware of this application at the start of the monitoring period of 1st October 2018.</p> <p>Phase 1 for 215 dwellings is already under construction by Taylor Wimpey and nearing completion. The element of the supply to which this relates is Phase 2 for 600 dwellings.</p> <p>Taylor Wimpey and the Council have also signed a Memorandum of Understanding in respect of the site. This document outlines the following:</p> <ul style="list-style-type: none"> • A number of pre-commencement conditions have been submitted under reference DC/18/04761 and will be determined shortly (approved in January 2019); • Confirmation that no additional site assessment works will affect Taylor Wimpey's intention to deliver the site as planned; • Confirmation that unless there is a significant change |

| | | | | | |
|------------------------------|---------------|---------|-----|-----|---|
| | | | | | <p>in the housing market viability, financial viability will not affect the deliverability of the site;</p> <ul style="list-style-type: none"> • The outline permission for the wider site is controlled by Taylor Wimpey and therefore there are no issues with site ownership or access affecting the commencement of the site; • The infrastructure to serve the site has already been approved under a full planning application (Ref: 5005/16) and is already under construction. Therefore, the infrastructure will be in place allowing the reserved matters applications to be brought forward promptly and assist the speed of delivery. <p>The MoU confirms the intention of Taylor Wimpey to deliver the site in the region of 50dpa. Phase 1 has delivered in excess of 50dpa in each full year of construction to date and is expected to do so again in 2018 (see appendix x). Taylor Wimpey have a track record of delivering such levels of completions and the evidence supports a deviation from the prescribed delivery rates in section 3.</p> <p>This provides clear evidence of the intention of Taylor Wimpey, a national housebuilder in bringing this site forward, notwithstanding Taylor Wimpey are currently delivering 215 dwellings directly adjacent to the site.</p> <p>It is also of note that the Inspector for the Land on east side of Green Road, Woolpit appeal considered this site to demonstrate the clear evidence required to be included in the five-year supply and considered the site capable of delivering 200 dwellings in the five year supply in his decision dated 28th September 2018 (Ref: 3194926, paragraph 68 and footnote 12)</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>The reserved matters application was approved on 2nd November 2018, by Mid Suffolk Council.</p> |
| Land adjacent Wetherden Road | M/4911/16/OUT | Outline | 240 | 160 | <p>Outline planning permission was granted on 28th March 2018.</p> <p>At 2nd November 2018, the site was owned by J.D. & R.J. Baker Farms Limited. Although it is expected the sale of the site, to Crest Nicholson, will be completed shortly as the reserved matters application has only very recently been approved.</p> <p>A reserved matters application for 240 dwellings was submitted by Crest Nicholson in April 2018, soon after the outline application was granted. The Council were aware of this application at the start of the monitoring period of 1st October 2018 and provided the Council with clear evidence of the intention of Crest Nicholson in bringing this site forward.</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>The reserved matters application was subsequently approved in October 2018.</p> <p>An application was made in May 2018 to discharged 20 conditions, which was subsequently approved in February 2019 under reference (DC/18/02237) and an additional application to discharge conditions submitted in January 2019 to discharge 8 conditions under reference DC/19/00405 also by Crest Nicholson.</p> |

| | | | | | |
|---|---------------|---------|-----|-----|--|
| Land to the south side of Norton Road | M/5010/16/OUT | Outline | 175 | 160 | <p>Outline planning consent was approved on 30th October 2017 on appeal.</p> <p>The site is owned by Green King Brewing and Retailing Limited, but the site is subject to a charge on the land registry register which confirms an option to purchase the land pursuant to an agreement dated 24th May 2013 between Greene King, Mr J Fisher and Mr R Flack and Hopkins Homes (house builder).</p> <p>A reserved matters application for 175 dwellings was submitted in March 2018 by Hopkins Homes, a regional housebuilder. The Council were aware of this application at the start of the monitoring period of 1st October 2018 and provided the Council with the clear evidence needed of the intention of Hopkins Homes in bringing this site forward.</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>The reserved matters application was subsequently granted on 12th October 2018.</p> <p>A non-material amendment application was approved in February 2019 and was submitted by Hopkins Homes. Also submitted by Hopkins Homes was an application to discharge condition 8 (archaeology) is currently pending (DC/19/00735). This reaffirms the intention and commitment of Hopkins Homes delivering the site.</p> |
| Land west of Ixworth Road, Thurston | M/4963/16/OUT | Outline | 250 | 160 | <p>Outline planning consent was approved on 9th July 2018 under reference 4963/16.</p> <p>A reserved matters application for 250 dwellings was submitted in August 2018 by Persimmon Homes, a national housebuilder under reference DC/18/03547. The Council were aware of this application at the start of the monitoring period of 1st October 2018 and provided the Council with the clear evidence needed of the intention of Persimmon in bringing this site forward.</p> <p>The site is owned by Mr Adrian Nice and Mrs Pauline Nice at 12th October 2018, with an option to purchase the site dated 19th July 2018 by Persimmon Homes.</p> <p>An MoU has been prepared and signed between the Council and Persimmon Homes. This MoU is attached at appendix 3. In summary, this outlines that two meetings have taken place since submission of the reserved matters application and amendments have been made to address the comments and expect the application to be presented to planning committee on 13th February 2019. The MoU confirms no issues with viability. The site is under single ownership and Persimmon have an option to purchase the site. Persimmon expect completions of 50dpa from the year 2019/20 although in the absence of a past record of delivery in the district for Persimmon, 40dpa has been applied from 2019/20 in line with local evidence.</p> <p>This demonstrates clear evidence that the site will deliver completions in 5 years.</p> <p>Due to final amendments sought from Persimmon on the layout, the reserved matters application has been deferred to the 27th March 2019 planning committee and is recommended for approval.</p> |
| Land on the north side of Norton Road, Thurston | M/5070/16/OUT | Outline | 200 | 140 | <p>Outline planning consent was approved on 29th March 2018 and was submitted by Pigeon Capital Investment and Mr Peter Hay.</p> <p>An MoU has been prepared and signed between the Council and Pigeon which is attached at Appendix 3. It outlines that Pigeon Linden Homes as its development partner and the sale of the site to Linden was completed in October 2018. Linden Homes</p> |

| | | | | | |
|---|-----------------|---------|----|----|---|
| | | | | | <p>prepared a reserved matters application for the site following pre-application discussions with planning officers at MSDC. The MoU confirms no issue with viability. The site is expected to deliver completions from 2019/20 and at a rate of 40dpa which is in line with local evidence.</p> <p>Linden Homes confirmed on 13th March 2019 that the Reserved Matters application was submitted on 8th March 2019 as broadly expected in the MoU.</p> <p>This demonstrates clear evidence that the site will deliver completions in five years.</p> |
| Land to the east of Turkeyhall Lane and to the north of North Close, Bacton | DC/18/00723/OUT | Outline | 51 | 51 | <p>Outline planning permission was granted in July 2018 and was submitted by Pigeon.</p> <p>An MoU has been prepared and signed between the Council and Pigeon which is attached at Appendix 3. It outlines that the site is owned by Cocksedge Building Contractors who will build out the site, who are currently preparing a reserved matters application and expect this to be submitted in early 2019. There are no issues with ownership or financial viability on the site. The MoU expects 30 completions in 2019/20 and 21 completions in 2020/21. These delivery rates have been applied to the trajectory, but completions have been anticipated a year later than identified in the MoU to reflect the local evidence on lead-in times of 2.7 years, as there is no available past record of delivery of the developer to assume faster lead-in times.</p> <p>This demonstrates clear evidence that the site will deliver completions in five years</p> |

c) Summary of Housing Land Supply

5.5 Table 14 below outlines the components of housing land supply by type of application.

Table 14. Number of Sites in Housing Land Supply by Type of Permission

| Type ⁶ | No. of Sites |
|-----------------------------|--------------|
| Under Construction | 21 |
| Full Planning Permission | 12 |
| Reserved Matters Permission | 2 |
| Outline Planning Permission | 6 |
| Small Sites (<10 Dwellings) | 475 |
| Total Sites | 516 |

⁶ See relevant appendix each trajectory.

6.0 WINDFALL ASSESSMENT

- 6.1 The Framework and PPG allow for local authorities to include a windfall allowance in their five-year housing land supply where there is *“compelling evidence that they will provide a reliable source of supply”* (Framework paragraph 70).
- 6.2 Windfall is defined in the glossary of the Framework on page 73 as *“sites not specifically identified in the development plan”*.
- 6.3 Paragraph 70 of the Framework states that *“any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”*.
- 6.4 Paragraph 048 of the PPG also requires annual position statements of five-year land supply to assess the permissions granted for windfall development by year and how this compared with the windfall allowance.
- 6.5 This section examines the past trends and considers the potential for future delivery of housing on windfall sites across Mid Suffolk and considers whether there is justification to include an allowance for windfall in the five-year housing land supply. Analysis of historic trends and consideration of future windfall sources has been undertaken to ascertain the level of any such allowance.
- 6.6 Monitoring records show that since 2014/15 windfall has consistently delivered a significant proportion of Mid Suffolk’s housing completions. Table 14 presents the total number of windfall completions between 2014/15 and 2017/18 as a proportion of total completions. The table demonstrates that since 2014/15, 69% of net completions on all residential development has been on windfall sites.

Table 15. Windfall as a Proportion of Net Completions⁷

| AMR Year | Net Completions | No. of Windfall Completions ⁸ | % of Net Completions |
|--------------|-----------------|--|----------------------|
| 2017/18 | 426 | 292 | 69% |
| 2016/17 | 305 | 230 | 75% |
| 2015/16 | 304 | 240 | 79% |
| 2014/15 | 416 | 246 | 59% |
| Total | 1,451 | 1,008 | 69% |

a) Methodology

- 6.7 Analysis on windfall dwelling delivery rates has been conducted for the 4 years 2014/15 to 2017/18 for which the Council have adequately detailed records.
- 6.8 As part of the analysis, the following types of windfall were removed from the assessment:
- Sites in residential gardens. Although no longer restricted in the inclusion of windfall assessments, this type of windfall as a continued source is uncertain.
 - Sites larger than 0.25ha or more than 11 dwellings in size. These sites have been

⁷ Table 10 of 2017-18 Annual Monitoring Report

⁸ Includes residential garden land

removed, as sites of this size would be expected to be allocated in the emerging Local Plan. The year in which windfalls make a contribution to land supply in this assessment, it is likely that there will have been further progress on the emerging Local Plan, possibly to Plan Examination.

- c. Sites granted through appeal. All sites granted by appeal cannot be relied upon due to the nature of their determination, plus the closer the Council comes to adopting a Local Plan and after adoption, it is likely there will be fewer appeals. Permissions granted by appeal have been removed across all site types.

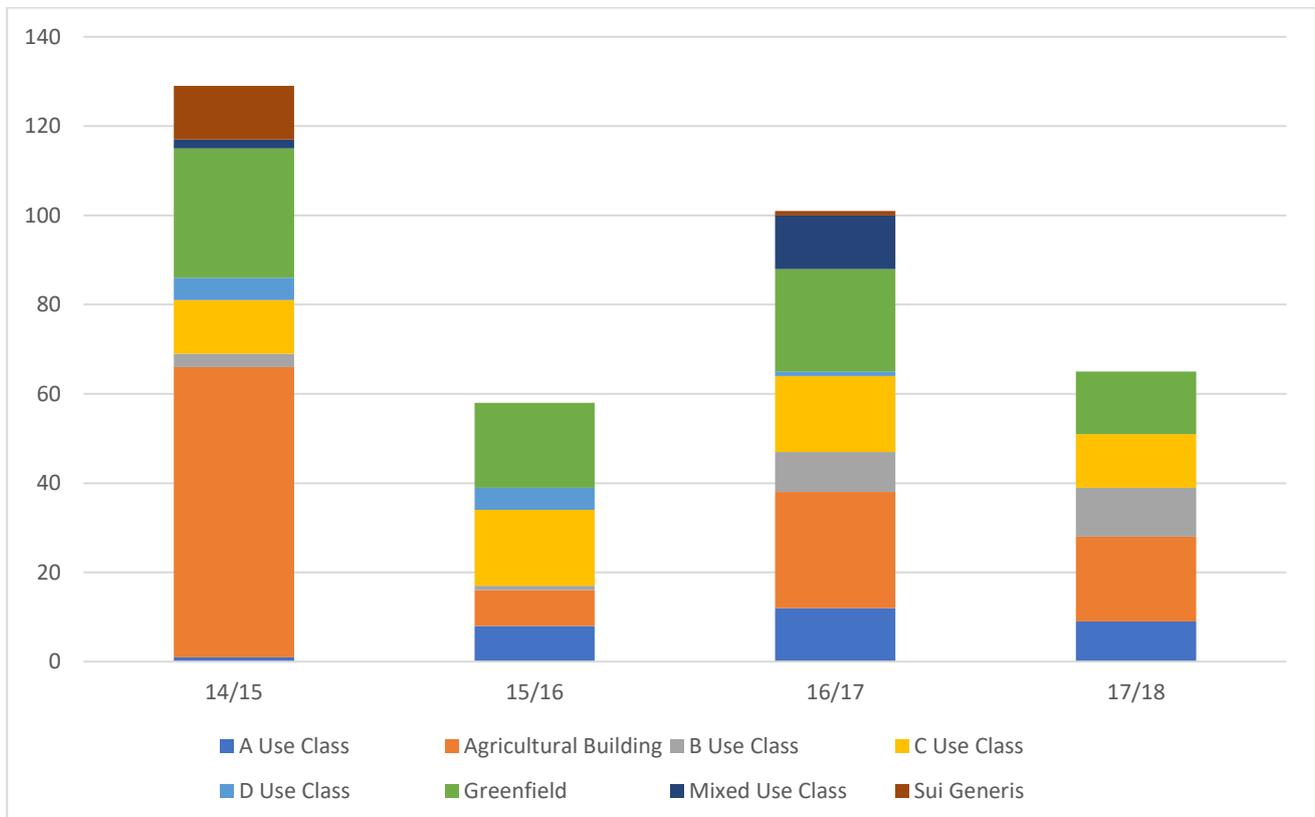
6.9 As a result, a total of 353 windfall completions in the period 2014/15 to 2017/18 are removed following this filtering process.

b) Sources of Windfall

6.10 Following the removal of a number of sites detailed above, the source of remaining windfall sites has been analysed.

6.11 Chart 1 identifies the nature of windfall completions and sites that have come forward over the last 4 years in Mid Suffolk. Sites which have previously been used as agricultural dwellings have contributed the biggest proportion of windfall completions annually over the last 4 years, this equates to 33% of windfall. Greenfield sites have contributed 24% of windfall completions in the last 4 years.

Chart 1: Small Windfall Completions by Source

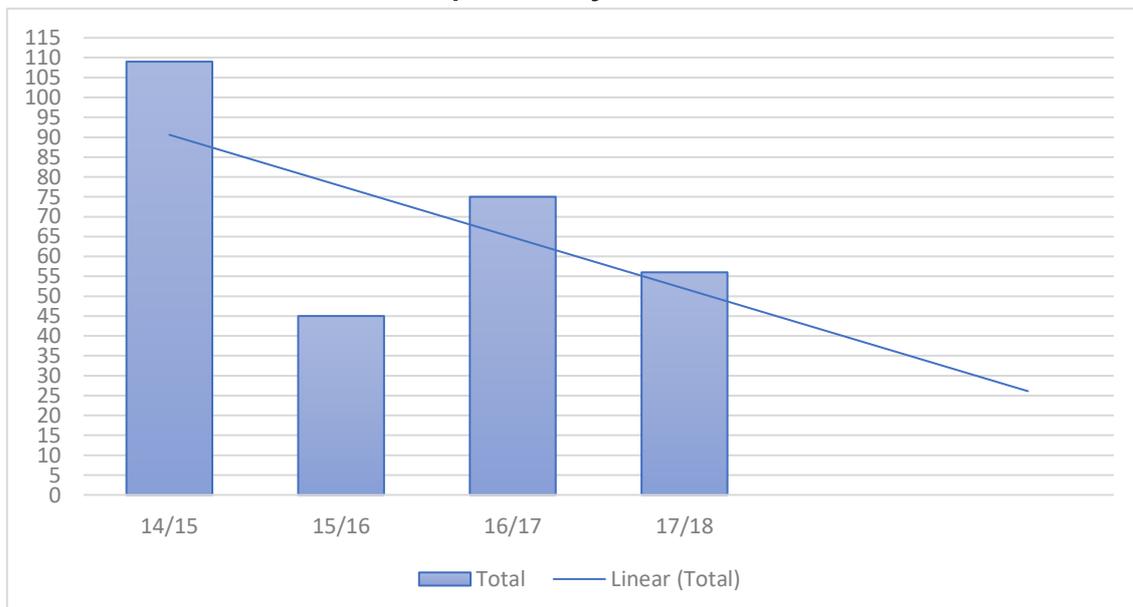


6.12 Given the rural nature of the district and changes in modern agriculture, it is reasonable

to assume that windfall completions on previous agricultural buildings and greenfield sites will provide a future consistent source of windfall.

- 6.13 It is also expected windfall completions on former B Use Class buildings will continue to provide a modest contribution due to the temporary change to permitted development rights remaining and furthermore a contribution can be expected from former C Use Class buildings.
- 6.14 Chart 2 has been produced removing windfall completions from sources which are considered to be unreliable or not providing a constant form of supply, namely:
 - a. A Use Classes;
 - b. D Use Classes;
 - c. Mixed Use Classes;
 - d. Sui Generis
- 6.15 When removing sources of supply likely to be inconsistent, it can be demonstrated that the future trends of those remaining sources is set to decrease and is predicted to be around 25dpa by year 3 (2020/21) when windfalls contribute in the five-year land supply.
- 6.16 This is considered to be an accurate reflection of the Council's intention to adopt a new Local Plan which will provide site allocations and direct development into specific locations thus reducing contribution from windfall sites to annual completions.
- 6.17 A windfall allowance of 25dpa has been applied to years 3, 4 and 5 of the five-year housing land supply to avoid the double counting in years 1 and 2 of smaller sites already in the 5 year supply.

Chart 2: Small Windfall Completions by Year



7.0 LAND SUPPLY POSITION

- 7.1 This section concludes the housing land supply position in Mid Suffolk drawing on the evidence set out in sections 3-6 of this report. The assessment of deliverability as explained, was carried out on all sites, and those which were not considered deliverable have been removed. Overall, there are 516 sites through outstanding permissions which meet the relevant requirements set out in the 2018 Framework and PPG.
- 7.2 Drawing on the evidence on housing delivery from national research, national housebuilder performance and local evidence, a delivery rate of **40dpa** and a lead-in time of **2.8 years** has been applied. This is outlined in detail in section 3 of this report. Where MoUs set out different lead-in times and delivery rates, these have been used. Applying these assumptions to deliverable sites equates to a housing land supply of 3,493 dwellings to 2023.
- 7.3 6 sites with outline planning consent are considered to demonstrate the clear evidence as required by the Framework (2018) to be included in the housing land supply. These three sites had a reserved matters application lodged by a national or regional housebuilder at the start of the monitoring year and have been approved.
- 7.4 No sites are included in the supply which did not have a planning permission on 30th September 2018.

a) Housing Land Supply Components and Housing Land Supply Position

- 7.5 Details of the sites which comprise Mid Suffolk's Housing Land Supply are outlined in table 15. This table also concludes the housing land supply position of Mid Suffolk District Council to be **5.06 years**.

Table 16. Components of Five-Year Housing Land Supply

| Housing Land Supply Components | Housing Land Supply 2018-2023 | |
|--------------------------------|-------------------------------|--------------|
| | Under Construction | 1,231 |
| | Full Planning Consent | 351 |
| | Reserved Matters Consent | 170 |
| | Outline Planning Consent | 859 |
| | Small Sites (<10 dwellings) | 806 |
| | Windfall Allowance | 75 |
| | Total | 3,493 |
| Requirement Calculations | Requirement Scenario | |
| | Base LHN requirement (dpa) | 575 |
| | Requirement over 5 years | 2,875 |
| | With Buffer @ 20% | 3,450 |
| | Dwellings Per Annum | 690 |
| 5 Year Supply | Council Supply | |
| | Council Deliverable Supply | 3,493 |
| | Years @ 20% Buffer | 5.06 |
| | Oversupply/Undersupply | +43 |

- 7.6 Therefore, as required by the Framework (paragraph 73 and glossary page 66) and in accordance with the guidance set out in the Framework and accompanying PPG, Mid Suffolk District Council can demonstrate a 5.06 years housing land supply.

APPENDIX 1: NPPF/PPG CHECKLIST

A1.1 This appendix provides a check between the paragraphs of the Framework and PPG and which part of this report addresses it (or otherwise).

| Reference | Location |
|---|--|
| Housing Delivery Test (20% buffer) | Section 2c and Table 1, pages 9 & 10 |
| <p>PPG 036/047: relevant to Sites with Outline Planning Consent:</p> <p>Evidence may include:</p> <ul style="list-style-type: none"> • <i>“any progress being made towards the submission of an application;</i> • <i>any progress with site assessment work; and</i> • <i>any relevant information about site viability, ownership constraints or infrastructure provision.”</i> <p>For example:</p> <ul style="list-style-type: none"> • <i>“a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.</i> • <i>a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”</i> | Section 5(c), page 28-30 |
| <p>PPG 052: Consultation with Stakeholders such as:</p> <ul style="list-style-type: none"> • <i>“small and large developers;</i> • <i>land promoters;</i> • <i>private and public land owners;</i> • <i>infrastructure providers (such as utility providers, highways, etc);</i> • <i>upper tier authorities (county councils) in two-tier areas;</i> • <i>neighbouring authorities with adjoining or cross-boundary sites.”</i> | See Section 4 and Appendix x for a summary of the consultation responses received. |
| PPG 047: Assumption on delivery rates and lead-in times to be based on clear evidence. | Section 3, pages 11-24 |
| <p>PPG 048: Assessments will be expected to include:</p> <p><i>“for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates”</i></p> | Available records were not sufficient to adequately evidence this. |
| PPG 048: Assessments will be expected to include <i>“for small sites, details of their current planning status and record of completions and homes under construction by site”</i> | See Housing Trajectory |



| | |
|---|------------------------|
| PPG:048: Assessments will be expected to include <i>"permissions granted for windfall development by year and how this compares with the windfall allowance"</i> | Section 6, pages 31-33 |
| PPG 048: Assessments will be expected to include <i>"details of demolitions and planned demolitions which will have an impact on net completions"</i> | See Housing Trajectory |
| PPG 048: Assessments will be expected to include <i>"total net completions from the plan base date by year (broken down into types of development e.g. affordable housing)"</i> | Table 4, page 20 |
| PPG 048: Assessments will be expected to include <i>"the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply."</i> | Table 15, page 34 |
| NPPF Paragraph 73: Standard Method for Calculating Local Housing Need where adopted Local Plans are more than 5 years old | Section 2b, page 9 |

APPENDIX 2: LIST OF DOCUMENTS REFERENCED

- 1) Babergh and Mid Suffolk Joint Annual Monitoring Report 2017/18:
<https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/FINAL-BMSDC-AMR-2017-18.pdf>
- 2) National Planning Policy Framework (2018):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf
- 3) Planning Practice Guidance:
<https://www.gov.uk/government/collections/planning-practice-guidance>
- 4) Housing Delivery Test Measurement Rule Book:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf
- 5) Letwin Review:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf
- 6) Start to Finish How Quickly do Large-Scale Housing Sites Deliver?" NLP Paper (2016):
<https://lichfields.uk/media/1728/start-to-finish.pdf>
- 7) 'The Role of Land Pipelines in the UK Housebuilding Process' by Chamberlain Walker Economics (2017):
https://cweconomics.co.uk/wp-content/uploads/2017/10/CWEconomicsReport_Land_Banking.pdf
- 8) HBF Paper: Chairman's Update (31/03/2016)
- 9) 'Housing Delivery on Strategic Sites' by Colin Buchanan Report (2005):
<https://www.scribd.com/document/40249959/Housing-Delivery-on-Strategic-Sites>
- 10) *Urban Extensions: Assessment of Delivery Rates* by Savills (2013):
http://www.barrattdevelopments.co.uk/~/_media/Files/B/Barratt-Developments/materials-and-downloads/savills-delivery-rates-urban-extensions-report.pdf
- 11) 'Factors Affecting Housing Build-out Rates' by University of Glasgow (2008):
https://www.gla.ac.uk/media/media_302200_en.pdf
- 12) Avant Homes Full Year Results 2018;
<https://www.avanthomes.co.uk/about-us/corporate-news/avant-homes-announces-reord-financial-results-and-40-per-cent-rise-in-profits-for-2018/>
- 13) Barratt/ David Wilson Homes Trading Update 2018;

<http://www.barrattdevelopments.co.uk/~media/Files/B/Barratt-Developments/press-release/2018/trading-statement-oct-2018.pdf>

- 14) Bellway Homes Annual Report 2018;
<http://www.bellwaycorporate.com/sites/default/files/2018-11/annual-report-2018.pdf>
- 15) Bovis Homes Half Year Report 2018;
<https://www.bovishomesgroup.co.uk/~media/Files/B/Bovis-Homes-Group/documents/reports-and-presentations/2018/half-year-report-2018.pdf>
- 16) CALA Homes Full Year Update 2018;
<https://www.cala.co.uk/~media/files/group/cala-group- fy-update -july-2018.pdf?la=en>
- 17) Countryside Properties Full Year Results 2018;
https://investors.countrysideproperties.com/application/files/8415/4278/3686/FY18-RNS_v1.5.pdf
- 18) Crest Nicholson Half Year Results 2018;
<https://www.crestnicholson.com/investor-relations/reports-results-and-presentations>
- 19) Kier Group Annual Report 2018;
<https://www.kier.co.uk/media/2408/kier-annual-report-2018.pdf>
- 20) Linden Homes Galliford Try Full Year Results 2018;
<https://www.gallifordtry.co.uk/~media/Files/G/GallifordTry/presentation/2018/full-year-results-2018-presentation.pdf>
- 21) Miller Homes Half Year Results 2018;
<https://www.millerhomes.co.uk/corporate/financial/news-and-press/Interim-Results-for-the-Six-Months-Ended-30-June-2018.aspx>
- 22) Persimmon Home Half Year Results 2018;
<https://www.persimmonhomes.com/corporate/media/355105/final-hy18-announcement.pdf>
- 23) Redrow Homes Full Year Results Presentation 2018;
<http://investors.redrowplc.co.uk/~media/Files/R/Redrow-IR-V2/latest-results/2018/analyst-presentation-full-year-2018.pdf>
- 24) Taylor Wimpey Trading Statement 2018:
<https://www.taylorwimpey.co.uk/corporate/investor-relations/reporting-centre/2018>



**APPENDIX 3: COLLECTION OF MEMORANDUMS OF UNDERSTANDINGS
IN RESPECT OF THE FOLLOWING SITES:**

- a. Land north of Chilton Leys, Stowmarket
- b. Land west of Ixworth Road, Thurston
- c. Land on the North Side of Norton Road, Thurston
- d. Land to the east of Turkeyhall Lane and to the North of North Close, Bacton



Appendix 3a: Land North of Chilton Leys, Stowmarket, MoU



Appendix 3b: Land west of Ixworth Road, Thurston, MoU



Appendix 3c: Land on the North Side of Norton Road, Thurston, MoU



Appendix 3d: Land to the east of Turkeyhall Lane and to the North of North Close, Bacton, MoU



APPENDIX 4: HOUSING TRAJECTORY



APPENDIX 5: SUMMARY OF STAKEHOLDERS CONSULTED AND COMMENTS RECEIVED

- A5.1 Appendix 5 provides a summary of comments received, and any changes made from the consultation draft land supply statement.

APPENDIX 6: GLOSSARY OF TERMS

Annual Monitoring Report (AMR): an annual assessment of the implementation of the Local Development Scheme, which monitors the extent to which local development plan policies are being used and performance against other key indicators.

A Use Class: Use of premises for shops, financial and professional services, restaurants and cafes, drinking establishments or hot food takeaways as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Build-Out Rate: The annual build-out rate on a site.

B Use Class: Use of premises for business, general industrial or storage and distribution as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Condition Discharge Application: A type of application where a condition in a planning permission or a listed building consent requires details of a specified aspect of the development (which was not fully described in the original application) to be approved by the local planning authority before the development can begin. This is also commonly known as 'discharging' conditions.

Core Strategy: The Core Strategy is one of the development plan documents forming part of a local authority's Local Plan (formerly the LDF). It sets out the long-term vision for the area, the strategic objectives, and the strategic planning policies needed to deliver that vision.

Conditions (or 'planning condition'): A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

C3 Class Use: Use of premises as a 'dwelling house' by a single person or by people living together as a family; or by not more than six people living together as a single household, as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

Deliverable: As defined in Annex 2 of the National Planning Policy Framework (2019) as to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Delivery Rate: The annual build rate on a site.

Detailed Planning Permission: A planning application seeking full permission for a development proposal, with no matters reserved for later planning approval.

Development Plan: A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted Local Plans, neighbourhood plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

D Use Class: Use of premises as a non-residential institution or for assembly and leisure as described in the Town and Country Planning (Use Classes) Order 1987 (as amended).

First Housing Completion: The date of the first housing completion on site.

Housing Delivery Test (HDT): As defined in Annex 2 of the National Planning Policy Framework (2019) as a mechanism which measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November. The outcome of which determines whether a 5% or 20% buffer is applied to the five-year land supply requirement.

Lead-In Time: This measures the period up to the first housing completion on site from the submission date of the first planning application made for the scheme.

Local Development Scheme (LDS): The local planning authority's scheduled plan for the preparation of Local Development Documents.

Local Housing Need (LHN): The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework) as defined in Annex 2 of the National Planning Policy Framework (2019).

Local Plan: As defined in Annex 2 of the National Planning Policy Framework (2019) as a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Local Plan Allocation: Sites identified within a Local Plan for housing, industry or other use that identifies a specific area of land to be developed within the time period of the Plan.

Memorandum of Understanding (MoU): A Memorandum of Understanding is a written statement of agreement between the Council and the site developer(s) which confirms the developers' delivery intentions and anticipated start and built-out rates.

Mixed Use Class: Use of premises which provides a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.

National Planning Policy Framework (NPPF): sets out government's planning policies for England and how these are expected to be applied.

National Planning Practice Guidance (PPG): The National Planning Practice Guidance adds further context to the National Planning Policy Framework (“NPPF”) and it is intended that the two documents should be read together.

Net Completions: Measures the absolute increase in stock between one year and the next, including other losses and gains (such as conversions, changes of use and demolitions).

Outline Planning Permission: A general application for planning permission to establish that a development is acceptable in principle, subject to subsequent approval of detailed matters.

Pre-Commencement Condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order which must be discharged prior to commencement of development.

Reserved Matters Application (RM): The application for approval of reserved matters should be made after the grant of outline planning permission and should deal with some or all of the outstanding details of the outline application proposal, including appearance, means of access, landscaping, layout and scale.

Start on Site: The point at which site works commence.

Sui Generis: Uses of land and buildings which do not fall within a specified use class of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Windfall Sites: Defined in Annex 2 of the National Planning Policy Framework (2019) as Sites not specifically identified in the development plan.

Windfall Allowance: An allowance made in the five-year land supply for windfall sites (as defined above).