

**Mid Suffolk District Council**

# **Housing Delivery Test Action Plan**

**June 2019**



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# 1. Introduction

## A. Background to this Action Plan

- 1.1 Housing delivery is a known national issue which affects social and economic matters. Various Government initiatives have undertaken reform of the planning system to help stimulate and support house building.
- 1.2 As part of ongoing reform the Government have introduced the Housing Delivery Test (HDT) as a mechanism to monitor housing delivery within local areas.
- 1.3 The HDT measures net additional dwellings provided within a local authority area against the number of dwellings required and shows the performance for each local planning authority in England. The HDT results were published in February 2019 and identified the Mid Suffolk District Council area as achieving 81% of the total number of dwellings required between 1<sup>st</sup> April 2015 and 31<sup>st</sup> March 2018. This means the Council has not met the HDT requirements as the results have to be 95% or above to pass the test. As a result, there is a need for Mid Suffolk to produce, adopt and publish a Housing Delivery Test Action Plan (HDTAP) within a period of six months from February 2019. This document comprises Mid Suffolk's Housing Delivery Test Action Plan.
- 1.4 The HDT national results for Mid Suffolk also require the additional 20% buffer to the current housing requirement, as identified by the Government's standard method for calculating housing need of 556 per year, for calculating the five-year housing land supply. As Mid Suffolk District Council and neighbouring local authority Babergh District Council are operating with full officer integration but are still sovereign Councils, they are producing separate HDTAPs.
- 1.5 However each HDTAP may include elements which apply to both Councils dependent upon the evidence. A joined-up approach and strategy is appropriate and provides consistency where applicable, particularly given that both Councils are producing a Joint Local Plan and have an agreed Homes and Housing 2019-2024 and Homelessness Reduction and Rough Sleeper Strategy 2019-2024.

## B. Purpose of this Action Plan

- 1.6 This action plan reflects issues and challenges across Mid Suffolk and identifies actions to address under delivery of the housing requirement. This action plan will detail the reasons for under delivery and the actions that will be taken to mitigate and increase delivery in the district area. This action plan also identifies ways to reduce future risk of under delivery, by setting out a number of measures to improve levels of delivery as advised by the National Planning Practice Guidance.

1.7 Therefore, this action plan looks back to gain a good understanding of issues affecting delivery, but also looks forwards to identify potential issues around future delivery and how delivery will be met.

1.8 This action plan is a practical document that focuses on effective measures pertinent to Mid Suffolk District which is underpinned by appropriate evidence, research and local understanding.

### **C. Relationship of this Action Plan to other Council activities and priorities**

1.9 It is important to recognise housing delivery is already a local priority and corporate matter for Mid Suffolk District Council. Housing delivery interlinks with other Council functions and services. In particular;

- The Council's **Joint Strategic Plan 2016-2020** (also known as a Corporate Plan) identifies housing delivery as a main strategic outcome to ensure more of the right type of homes, of the right tenure are in the right place.
- The Council's **emerging Joint Local Plan** (Strategic planning) is a statutory document that plans for future development of a local area, produced by the Local Planning Authority in consultation with the community. In law<sup>1</sup> it is also known as the development plan. The emerging Joint Local Plan will consist of strategic and non-strategic policies to be implemented across Mid Suffolk District.
- The **Homes and Housing Strategy 2019-2024 and Homelessness Reduction and Rough Sleeper Strategy 2019-2024** for Mid Suffolk is an agreed vision and long-term commitment for residents to have somewhere affordable to live. Providing a sense of belonging, contributing to health and wellbeing and to strengthen communities. The Homes and Housing Strategy identifies nine strategic aims which amongst other objectives seek to directly stimulate housing delivery and which interlink with strategic planning.

1.10 Mid Suffolk District Councillors decided in 2018/19 to allocate funds towards a new project for the unblocking of stalled housing sites within the District. The Council's objective for this project is to improve the delivery of housing by agreeing a series of action points and a strategy following an analysis of detailed work around housing delivery. Such analysis has taken the form of the construction of a database capturing extant planning permissions, pipeline data with a view to understanding the reasons for the current delivery rate by engaging with stakeholders in the process as well as undertaking housing market intelligence. The outcomes of this project are encapsulated in this Housing Delivery Test Action Plan. The approach to undertaking this project initiative and the Housing Delivery Action Plan are detailed in the methodology section below.

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<sup>1</sup> Planning and Compulsory Purchase Act 2004

## **D. Methodology**

1.11 The Council has undertaken the following key steps to prepare an effective HDT Action Plan that is collaborative, proportionate, effective and fit for purpose. These key steps have been developed into the structure and contents of this document.

<b>Tasks</b>	<b>Methods/Steps taken</b>
<b>Step 1 - Database</b>	Working with others to construct and co-ordinate an approach to achieving a stalled sites database.
<b>Step 2 - Develop an approach</b>	Develop an approach as part of the Unblocking Stalled Sites Strategy engaging with relevant stakeholders to understand the reasons for housing sites stalling and taking into account and producing a report on intelligence about the housing market for Mid Suffolk District.
<b>Step 3 - Engagement with Stakeholders</b>	Engage with stakeholders to understand issues and confirm reasons for stalled sites and possible actions to address the issues.
<b>Step 4 – Develop Council’s Strategy</b>	Develop and produce a Council strategy which will comprise the Council’s Housing Delivery Action Plan for addressing issues with stalled sites.
<b>Step 5 – Engage with officers / Councillors</b>	Engage with officers, Councillors and other relevant parties, as advised by the Council, regarding progress and actions.

## **2. Housing Delivery Analysis**

### **A. National Policy and Guidance**

2.1 One of the objectives of the National Planning Policy Framework (NPPF)<sup>2</sup> is to significantly boost the supply of homes. Paragraph 59 states that, “...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

2.2 Paragraph 67 goes on to state that planning policies should identify a supply of “specific, deliverable sites for years one to five of the plan period.” To be considered deliverable, there should be “...a realistic prospect that housing will be delivered on the site within five years”. Paragraph 74 explains that “a five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan or in a subsequent annual position statement which:

a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and

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<sup>2</sup> National Planning Policy Framework (Feb 2019)

b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.”

- 2.3 National Planning Practice Guidance provides more guidance on how to demonstrate a five-year supply. It states:

“Authorities may also consider how they can involve people with an interest in delivery in assessing the deliverability of sites. They may develop benchmarks and assumptions based on evidence of past trends for development lead-in times and build-out rates. Testing these assumptions with developers and using them to inform assessments of deliverability can also make deliverability assessments more robust.” (Paragraph: 030 Reference ID: 3-030-20180913).

- 2.4 Guidance on how authorities can review their five-year land supply annually states the following:

“Local planning authorities may need to develop a range of assumptions and benchmarks to help to inform and test assessments. Assumptions can include lapse/non-implementation rates in permissions, lead-in times and build rates, and these assumptions and yardsticks can be used to test delivery information or can be used where there is no information available from site owners/developers to inform the assessment. Assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. Tables of assumptions should be clear and transparent and available as part of assessments.

- 2.5 Evidence of delivery may need to differentiate between types and sizes of developers and of sites, and of type of product. This approach will ensure the assessment of delivery on sites will be as robust as possible.” (Paragraph: 047 Reference ID: 3-047-20180913).

## **B. The Letwin Review**

- 2.6 In October 2018, the Independent Review of Build Out, undertaken by Sir Oliver Letwin MP for the Government, was published. Whilst the study focused on the issue of the build out rate of fully permitted new homes on the largest sites in areas of high housing demand, i.e. not Mid Suffolk, it does have some analysis which provides a guide as to the scale of delays on very large, complex sites.

- 2.7 The study reviewed 15 sites, the smallest of which was just under 1,200 units (Trumpington Meadows, Cambridge) and the largest nearly 15,750 units (North Greenwich, Greenwich). It split the assessment into two main phases – first, from outline application to first detailed permission, and second, from first detailed permission to final completion. Each of these phases was split further.

- 2.8 The study found that over half the sites took between one and three years to move from outline application to first detailed permission; only one site took less than a year. By contrast, 80% of sites then took less than nine months to move from first detailed permission to first start on site.
- 2.9 What this suggests is that, for large sites, there is a long lead-in time needed to move the site through the planning process. However, once permission is received, these sites can build out very quickly.
- 2.10 Whilst the assessment of major sites in areas of high housing demand is not directly comparable to the circumstances in Mid Suffolk. It is instructive that the large majority of very large sites, which are being brought forward in multiple phases, take less than 12 months to have all conditions discharged and to then commence work on the site itself. Therefore, it would be reasonable to expect that smaller sites, albeit in an area such as Mid Suffolk where housing demand is lower, would at the very least take no longer than 12 months to complete the same phase of the permission and development process.
- 2.11 It is also important to note the Letwin Review identifies absorption rates are the driver of build-out rates. The homogeneity of housing type, tenure and price of the new dwelling on offer versus the limits on the rate the market will absorb is a fundamental driver of slow build out rates. 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 tenure.

### **C. Local Planning Context**

- 2.12 Mid Suffolk District is located within the Ipswich Housing Market Area (IHMA) as identified through evidence base (Strategic Housing Market Assessment as updated). Babergh District Council, Ipswich Borough Council and part of East Suffolk (the former Suffolk Coastal District Area) are also within the same Housing Market Area.
- 2.13 Mid Suffolk District is one of the largest districts in England and spans an area of 868 hectares and contains a population of approx. 101,500 (ONS 2017). Stowmarket is the largest town in the district; there are also the towns of Eye and Needham Market. Mid Suffolk has a large proportion of the A14, A140 and some of the A143 highway network. There are mainline railway corridors along the A14 and from the north. Mid Suffolk is rural in nature with clusters of settlements throughout the rural geographical area.

### **D. Site Sampling**

- 2.14 Mid Suffolk monitoring data has been used to assemble a profile of housing sites for which planning applications for outline planning permission or reserved matters or full planning permission have been submitted. Some site sample data has been analysed as at January 2019 and other data from April 2019 to identify possible trends and to consider likely causes of the trends, as far as they relate to the stalling of a site.

2.15 For the purposes of the assessment of sites in Mid Suffolk, they have been split into two different types:

- Major - 10 dwellings or more (net); and
- Minor – less than 10 dwellings (net).

2.16 Major sites, where relevant, have been further disaggregated into sites of between 10 and 50 dwellings and sites of more than 50 dwellings. For all sites there is no differentiation between market or affordable dwellings.

#### **E. Major and Minor Sites**

2.17 In January 2019, analysis was undertaken of all sites in the Mid Suffolk housing database which had received at least outline planning permission. This included major and minor sites and the database split them by the stage they had reached in the planning process as follows:

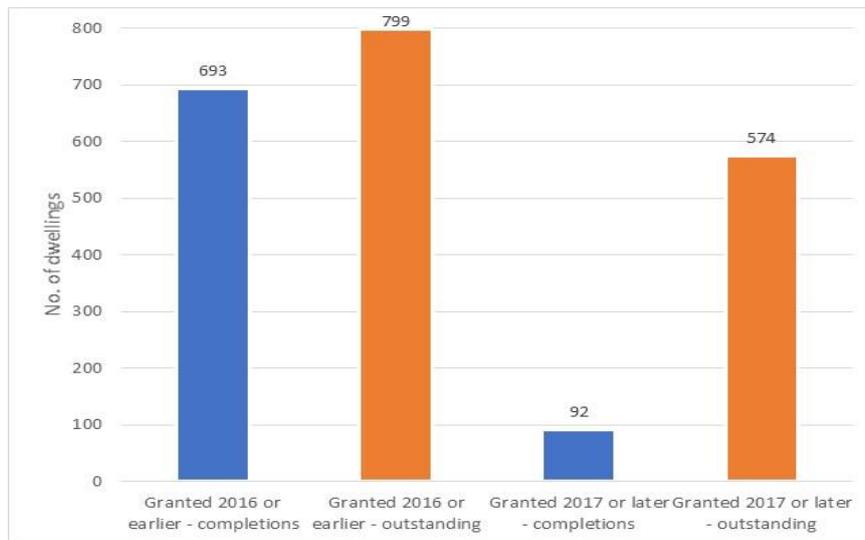
- Outline planning permission;
- Reserved matters permission;
- Full planning permission; and
- Sites under construction.

2.18 This analysis sought to understand which sites had reached their latest stage since 2017 and which sites had reached that stage in 2016 or earlier (representing a minimum three-year time period).

2.19 In total, in January 2019, there were 627 sites in the database – 554 were minor sites and 73 were major sites. These sites propose to deliver 6,783 dwellings, with major sites accounting for 5,973 dwellings and minor sites for 810 dwellings. This makes the average size of a major site 81.8 dwellings and a minor site just under 1.5 dwellings.

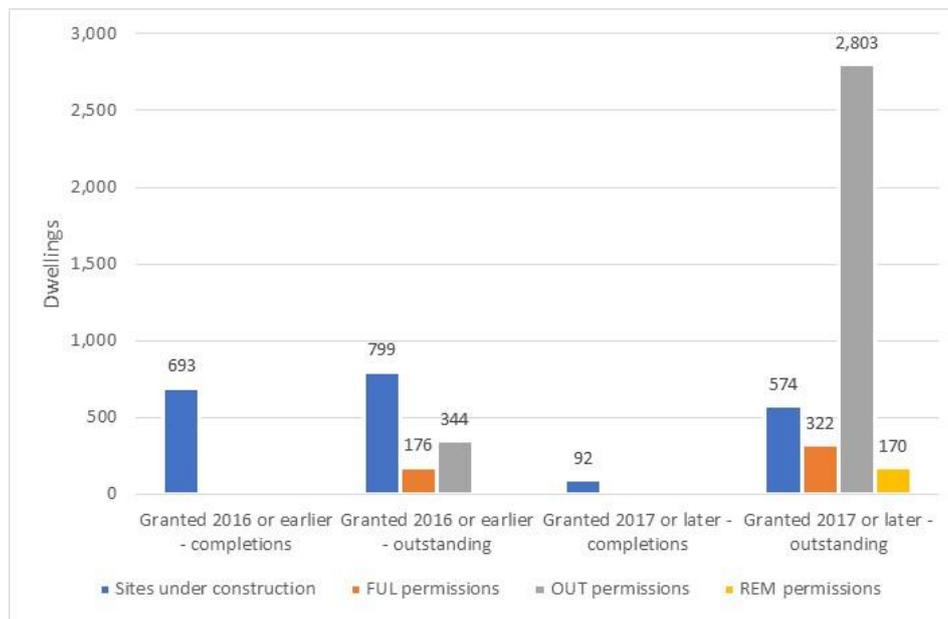
2.20 Figure 2.1 shows the split of major site completions and outstanding dwellings on sites under construction as at January 2019.

**Figure 2.1: Dwelling completions on major sites under construction that were granted planning permission pre- and post-2017 – as at January 2019**



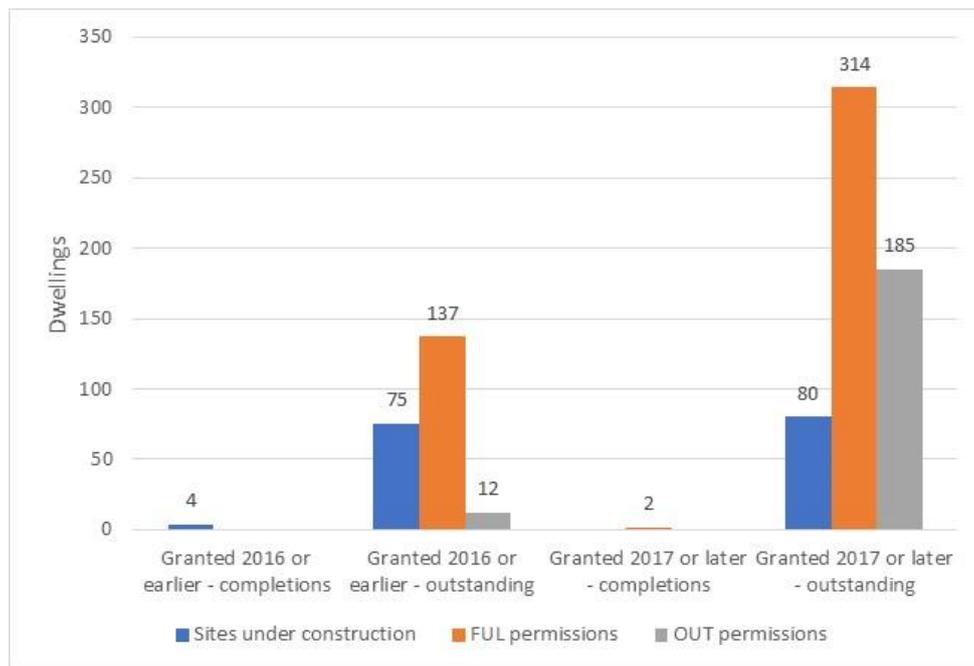
- 2.21 This shows that nearly 800 dwellings were granted planning permission at least three years ago but have not been completed. In other words, they have received full planning permission but the dwellings in question have not been built and/or registered as completions. By contrast, the equivalent figure for the number of dwellings that have full planning permission but have not been completed in the two-year period since 2017 is only 574 dwellings. Even though this figure is lower, it is worthy to note that the Letwin Review found that most major sites as defined in the review, i.e. more than 1,200 dwellings, moved from full detailed permission (i.e. either full planning permission or first reserved matters permission) to first completion within nine months. This should be set against the data informing Figure 2.1 which is that the 799 dwellings outstanding for at least three years are on four sites, representing an average site size of 200 dwellings. There is a similar profile for sites outstanding since 2017 – the 574 dwellings are on three sites, meaning an average site size of 191 dwellings.
- 2.22 Figure 2.1 shows that the pre-2016 sites have more dwellings outstanding than completed (693 dwellings). However, these 693 pre-2016 dwelling completions are on nine sites, representing an average site size of 77 dwellings, which is much smaller than pre-2016 sites with dwellings yet to be completed. There are five sites with dwellings completions since 2017 and these have delivered 92 dwellings, meaning an average of just over 18 dwellings per site.
- 2.23 This analysis suggests that whilst there are delays with a significant proportion of major sites, it is the largest of these where the delays are likely to be greatest, although this does not apply to all sites of this size, i.e. approximately 200 dwellings.
- 2.24 Figure 2.2 then shows the breakdown of dwellings on major sites which have planning permission but have not been completed.

**Figure 2.2: Major sites with planning permission pre- and post-2017, January 2019**



- 2.25 This shows that, of sites which were granted permission in 2016 or later, a total of 176 dwellings on six sites (average 29 dwellings) have full planning permission but have not been started and a further 344 dwellings on five sites (average 69 dwellings) have outline planning permission, but have not then had their reserved matters approved. It is noted that the average site size is larger for sites where outline planning permission has been sought compared with sites where full planning permission is sought. However, these 11 sites account for 520 dwellings outstanding for at least three years.
- 2.26 For dwellings on sites which have not completed since 2017, a high number – 2,803 dwellings on 30 sites (average 93 dwellings) have outline planning permission and a further 492 dwellings on 11 sites (average 45 dwellings) have either full planning permission or reserved matters approval. Many of these sites will have received this relatively recently so are not necessarily a concern in terms of delivery.
- 2.27 Figure 2.3 shows the equivalent data to Figure 2.2 for minor sites. This shows that there are 137 dwellings which have had full planning permission since 2016 but have not been completed and a further 12 dwellings that have had outline planning permission but have not been progressed in that time. For sites since 2017, the equivalent figures increase significantly to 314 dwellings with full planning permission and 185 dwellings with outline planning permission. However, again many of these may have received permission relatively recently.

**Figure 2.3: Minor sites with planning permission pre- and post-2017, January 2019**



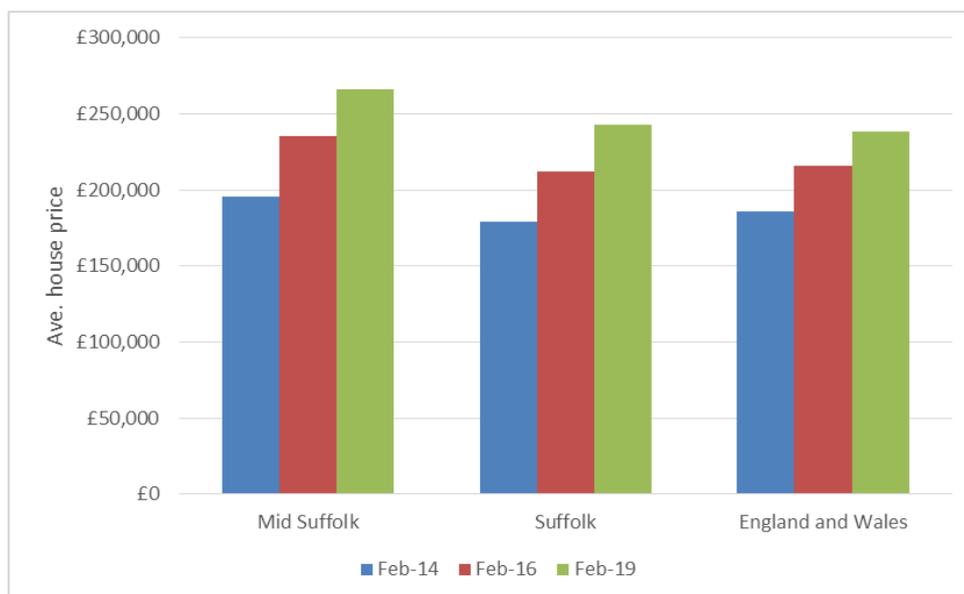
- 2.28 Whilst the issue of site delay is less pronounced for minor sites, there are still a number of dwellings – nearly 150 – that have not progressed to being built out over the last three years, despite having planning permission.
- 2.29 Analysis undertaken by Mid Suffolk to inform its 5-year housing land supply position as at the end of 2018/19 has shown that on a sample of 18 sites, the average lead-in time from submission of the first planning application to the first dwelling completion was 2.7 years, i.e. just over two years and eight months. Whilst therefore it would be more robust if such analysis had a larger sample size, an average lead-in time of 2.7 years is considered to be a reasonable benchmark for housing sites in Mid Suffolk. Indeed, this is in line with the national average period of 2.8 years.
- 2.30 National evidence on lead-in times has also been reviewed. Work was undertaken by Chamberlain Walker Economics, 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 identified four phases of delivery from pre-application phase to delivery of first completions. The evidence concluded that on average sites of more than 20 dwellings take between 5.7 and 7.0 years to complete all four phases.
- 2.31 The Chamberlain Walker Economics, data published in September 2017 when analysing application to permission (e.g. inclusion of Local Plan, negotiating of S106, scale of development, performance of LPA) and from permission to start on site (e.g. landownership, ground works, site infrastructure, discharge of conditions) an average of between 2.2 and 2.5 years nationally, according to the Chamberlain Walker Economics work. This is slightly shorter than the average lead-in period in Mid Suffolk, which could

reflect the fact that the nationwide analysis undertaken by Chamberlain Walker Economics took into account fewer complex sites and/or sites in stronger markets. Nevertheless, the report notes that, since previous equivalent analysis was undertaken by the Local Government Association, the average time period for permission to start on site had increased to 1.7 years from a previous range of between 0.6 and 1.0 years. It was considered that this was likely to be the result of an increased issue of pre-commencement conditions, which is associated with the permission to start on site stage.

## F. The Market and Housing Prices

- 2.32 The viability study<sup>3</sup>, which informed the development of the Mid Suffolk and Babergh CIL charges in 2014 noted that, whilst house prices had generally fluctuated in line with those across England and Wales as a whole, the average house price was consistently above the national average. This picture has continued since; in February 2019, the average house price in Mid Suffolk district was £265,886, compared with a national average price of £238,176. Moreover, Mid Suffolk is well above the county average for Suffolk, which stood at £243,215 in February 2019. Figure 2.4 shows how this picture has been consistent over the past five years.
- 2.33 Despite this picture of overall and consistent market strength, the 2014 viability study noted that, even when the market was buoyant, vendors needed to be realistic on asking price as units would only sell quickly if they were priced correctly. This issue is important to land values, otherwise good sites are likely to stall in the latter stages when they are purchased by the developers that are ultimately going to be selling the housing units.

**Figure 2.4: Average house prices, 2014-2019**



Source Land Registry

<sup>3</sup> Peter Brett Associates (2014) *Babergh & Mid Suffolk Community Infrastructure Levy Viability Study*, for Babergh and Mid Suffolk District Councils

- 2.34 Often it is the market conditions and who controls the site that will determine whether a site is developed or not or delayed. Evidence assembled by Chamberlain Walker Economics suggests that nationally over 55% of all planning permissions are held by non-builders. This is because of the way landownership works. This means sites held by non-builders have to be disposed of to a developer and so, for the landowner, a judgement needs to be made as to when to release their site onto the market. It is common local practice that sites are released to the market when they have outline planning permission, which allows a potential buyer the flexibility of submitting their own reserved matters applications which reflect the way they would wish the site to be developed. Many of these sites in Mid Suffolk which have outline planning permission, but have not had any reserved matters application submitted, are for sale but yet to attract a buyer.
- 2.35 In all cases the controlling interests of the site with either outline or full planning permission is the only party that can fully explain why a site has been delayed in moving from outline to reserved matters stage. Certainly, if sites are to be sold then there is likely to be at least a period of a few months of marketing, followed by a period when due diligence and legal work is carried out by a prospective buyer. Evidence shows where the time period that has elapsed is between ten and 12 months, these may not represent significantly stalled sites if they are sold soon and the new owners can complete the planning process and commence development promptly. However, if these sites continue to have no prospective buyers, the process of developing them out could be significantly elongated and therefore they could represent stalled sites.

#### **G. Housing delivery in Mid Suffolk and current Mid Suffolk housing land supply position**

- 2.36 In recent years Mid Suffolk District has experienced difficulty in consistently meeting the identified housing targets for the respective area. This has been highlighted by the national HDT result measurements (Feb 2019) and can be seen through previous annual monitoring reports, that identifies for Mid Suffolk 1,274 homes were required 2015-2018. However, only 1,035 were delivered in the same years.
- 2.37 That said the current published housing land supply position within Mid Suffolk is 5.06 years as evidenced within the Mid Suffolk Housing Land Supply Position Statement 2018/19 (March 2019).

#### **H. Emerging Joint Local Plan and approach to growth**

- 2.38 The Government have standardised the methodology for calculating local housing need as advised within the Planning Practice Guidance (housing and economic development needs assessment).
- 2.39 The emerging Joint Local Plan (JLP) between both Babergh and Mid Suffolk Districts is using a baseline of April 2018, with the Plan end date of March 2036 (18 years) to set the Local Authority housing need target within the

Ipswich Housing Market Area. Using the standard methodology, the local housing need for Mid Suffolk and the Ipswich Housing Market Area is as follows:

<b>Local Authority Area</b>	<b>Standard Method Total (2018 – 2036)</b>	<b>Annual Local Housing Need Target</b>
Mid Suffolk District	10,008	556
<i>Ipswich Housing Market Area</i>	35,334	1963

2.40 The Government’s standard methodology approach to local housing need is significantly higher (approximately 40%) than current levels of housing delivery, which creates challenges for the emerging JLP. The Councils proactive approach and strategy to growth is as follows:

- reviewing stalled planning permissions through a focused project;
- carrying out its own development through Mid Suffolk Growth property firm;
- ensuring that the emerging JLP aims to identify and create flexibility for more housing development across the district in the right locations; and
- identifying a buffer of approximately 20% in the supply of land for new housing up to 2036.

2.41 The spatial distribution of growth (through the Joint Local Plan) seeks to reduce the need to travel through good access to services and facilities. Mid Suffolk District will maintain its Ipswich fringe areas as historic strategic designations for growth, which recognises the cross-boundary influence of the Suffolk county town of Ipswich as a regional service centre. Also, sustainable urban areas and market towns will be allocated growth due to their significant service and facility provision. Core villages and all other settlements have been appropriately scored through a weighted scoring system due to their dispersed nature.

2.42 The planned spatial distribution that the Council are producing is mindful of the inherent market strengths within the area. The Council has sought to ensure that the most suitable and deliverable sites are proposed. In many instances this requires the complex alignment with infrastructure improvement programmes and investment to ensure sustainable growth.

2.43 High house prices (and low average wages/salaries) across Mid Suffolk mean that it is difficult for people to purchase or rent a house on the open market. Therefore, appropriate size, type and tenure of affordable housing are key factors to success across the whole of the district.

2.44 The transport corridors of the A12, A14 and mainline railway lines represent a strong effect upon market forces and the demand for housing. Compatible growth along these areas can reduce the need to travel or encourage sustainable travel due to access to public transport.

- 2.45 A significant number of Neighbourhood Plans (NP) are emerging throughout the Local Plan area, with a range of local issues and objectives being planned for. The District Council is drafting minimum housing requirement figures for these areas to assist the NP groups.
- 2.46 The emerging JLP for both Babergh and Mid Suffolk Districts is currently at Regulation 18 stage. The emerging JLP has already been through a previous Regulation 18 consultation back in August 2017. Due to the number of consultation responses received at that time in combination with a number of service area changes, and changes to National Planning Policy Framework, it is considered appropriate and necessary to undertake a further Regulation 18 consultation stage. This will take place in the summer 2019.

### **I. Community Infrastructure Levy and Viability**

- 2.47 Work to update Mid Suffolk Community Infrastructure Levy (CIL) evidence base is being undertaken concurrently with the Housing Delivery Test Action Plan work. The purpose of this CIL review work is to update the study undertaken in 2014 which informed the development of the CIL charge which was subsequently brought into force in April 2016. It provided an assessment of the viability of different types of development across Mid Suffolk district and its ability to support a CIL charge without undermining the viability of development.
- 2.48 At this stage in the viability work, it is understood that there have been no material changes in circumstances since 2014 in terms of the viability of residential development across the district. Generally, the market for residential development is reasonable, but is susceptible to issues on difficult sites and sites with abnormal costs. However, there is nothing to suggest a more widespread structural problem which is causing sites to stall. Minor sites – of less than ten dwellings – have generally been delivered more consistently than major sites. It is considered that this is because most of these sites are in rural, village locations where values are higher and the size of the sites mean there are fewer issues that could cause a delay because of viability issues.
- 2.49 When the CIL was brought into effect in April 2016, this required development to make a non-negotiable payment towards district-wide infrastructure provision. The payment required is based on the size, location and type of development. In the majority of Mid Suffolk district, new housing development is required to pay £115 per square metre (psm) + indexation on net additional floorspace, excluding affordable housing.
- 2.50 Simultaneous to this Mid Suffolk brought into force the CIL payment plan schedule, which is available on the Council's website<sup>4</sup> detailing CIL liability.
- 2.51 It is important that Mid Suffolk continues to closely monitor progress with the build-out of sites and to engage with developers in order to better understand the common types of issues which delay commencement once a site is

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<sup>4</sup> Link to CIL payment schedule: <https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/Pre-Adoption-Documents-Mid-Suffolk/MSDC-instalments-policy-Jan-2016.pdf>

'shovel-ready'. In particular, it could be a clearly stated intention of the Council to engage with all developers of sites with planning permission where there is only 12 months to run before the permission expires. The purpose of the engagement process will be to try to understand what is needed to ensure that the permission gets built out and what the Council can do to support this.

**J. Root Cause Analysis (Key Issues and Challenges)**

- 2.52 There is a strong and compelling vision, aim and set of objectives running through Mid Suffolk District Council regarding housing delivery. This is to improve and achieve housing delivery, from a corporate level right through to a strategic planning and local community level.
- 2.53 A broad range of evidence has been sought by the Council and collaboration from key stakeholders has been undertaken for the housing supply process and to better understand what the key issues and challenges are that influence and create low delivery rates. The database has been created alongside direct knowledge of local sites, land and development activity. Market intelligence has been undertaken to understand the reasons for housing sites stalling.
- 2.54 Site samples have been used as the method to establish key issues and challenges in housing delivery within Mid Suffolk. The key issues and challenges that have emerged from this data analysis are as follows and have been set out in to the following three key issue areas (early stallers, condition stallers and late-stage stallers):
- 2.55 **Issue 1: Early Stallers – are sites that have yet to receive full planning permission when a planning application – either full or outline – has been submitted.**

Time Period

- I. The time period from submission of the first planning application to full planning permission<sup>5</sup> has been 18 months (1.5 years), which is significantly higher than the national average (approx. ten months).

Number of outline permissions

- II. There are a number of outline planning permissions that have not moved to the reserved matters stage after ten months with unclear reasons as to why. Such reasons could be either a reserved matters application is being prepared, pre-application engagement by the promoter in respect of reserved matters or clear assurance from the promoter about the intention to proceed. It is clear there are outline planning permissions that may be delayed due to being sold on.

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<sup>5</sup> This could either have been through a single, full application or through an initial outline application followed by a reserved matters application.

### Speculative permissions and Controlling interests

- III. A number of planning permission are speculative planning permissions. The evidence has identified that some sites are under controlling interests such as property investment companies being held on to, also known as 'banking', sold or bought. The market conditions determine what the control of property investment companies chose to do with the site, which in succession can often determine what potential buyers chose to do as well. With any degree of uncertainty often the approach of sellers and buyers is to wait and see what happens to the market over the short-term.

2.56 **Issue 2: Condition Stallers** – are sites which are in the period between the grant of full planning permission and all conditions having been discharged, i.e. being able to start on site.

### Difficulties in discharging conditions

- I. There are difficulties in discharging conditions on planning applications. Analysis of such sites show it is often the case the sites are landowner-led, property development company or national housebuilder. Therefore, the reasons are likely to be different in each case, but are likely to be in relation to the following:
- Sites controlled by housebuilder where the site could be developed without the need to be sold first. One of the sampled sites has recently applied to reduce the level of affordable housing provision as part of the scheme, suggesting that viability has changed since the site was initially taken through the planning process.
  - Sites being taken forward by the landowner, but permission has expired. This suggests that the landowner may have changed their mind about development - such decisions could be argued to be more likely when led by a private landowner compared with if they are led by a developer or property company that is solely in the business of developing or selling sites.
  - Sites under the control of a property company.

### Financial viability

- II. Financial viability is often a primary driver. 2016 research published on stalled residential sites in England<sup>6</sup> reviewed a range of site typologies in different parts of the country from the point at which they were 'shovel ready', i.e. they were able to commence construction on site, the nature of the research can clearly be applied to sites which are almost shovel-ready, i.e. only have conditions to be discharged. What this research found was that whilst financial viability is likely to be a primary driver of site stalling, the reasons for stalling are often more nuanced. Housebuilders need to maintain an inventory of sites in order to manage their workflow although they account for a relatively small proportion of stalled sites. Other landowners seem to be exercising their options to delay the sale of their sites. As the research notes, "Essentially, owners' decisions on whether to sell a site to a developer are analysed in terms of weighing the opportunity costs of keeping their site vacant against

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<sup>6</sup> McAllister, P., Street, E. and Wyatt, P. (2016) An empirical investigation of stalled residential sites in England, Planning Practice and Research, 31 (2). pp. 132-153.

the expected gain from delaying sale until more favourable market conditions prevail.” There are at least two sites in Mid Suffolk that potentially illustrates this process playing out. This also coincides with the knowledge that some developers have described their ‘sell-to-build’ business model in which they must sell a unit in order to finance the building of another unit. This means build out of the whole scheme could be slow or stall completely depending on the market conditions and financial viability.

2.57 **Issue 3: Late-stage Stallers** – are sites which have reached the point when construction may commence, i.e. there are no further administrative requirements to be met.

Financial viability

- I. As with Issue 2 – condition stalling (above) financial viability is also an issue for late-stage stalled sites. The 2016 research on stalled residential sites in England<sup>7</sup> found that financial viability is likely to be a primary driver of site stalling, particularly in lower value house areas. It notes: “The overarching shifts are that house values have fallen in many areas, developers’ and lenders’ risk aversion has increased and, as a result, once viable financially feasible projects are no longer feasible. At current market prices and taking into account development costs, housing development is not viable on a substantial proportion of what is often defined as housing land supply.”

Realistic pricing

- II. Evidence shows earlier in this document house prices in Mid Suffolk have generally been consistent market strength over the past five years. Despite this picture of overall and consistent market strength, the 2014 viability study noted that, even when the market was buoyant, vendors needed to be realistic on asking price as units would only sell quickly if they were priced correctly.

Site commencement

- III. It has also been recognised through development management collaborative work in relation to infrastructure planning, community infrastructure levy work and housing land supply work some sites commence in order to keep the planning permission live, but there is no immediate intention to build out the site. The exact reason is not known, but on the balance of probability it is expected to be due to market conditions and finances which would be involved. Ultimately it is only the applicant/landowner/site promoter who can clearly explain the reasons why their individual site is delayed.

Alternative permissions

- IV. Some sites are known to have benefit from a number of alternative permissions. This could be a full planning permission, after an initial outline or a subsequent section 73 or a Minor Material Amendment (MMA) or Non Material Amendment (NMA), especially if there has been a change of owner since the original planning permission was granted.

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<sup>7</sup> McAllister, P., Street, E. and Wyatt, P. (2016) An empirical investigation of stalled residential sites in England, Planning Practice and Research, 31 (2). pp. 132-153.

## **K. General Conclusions**

- 2.58 The data and evidence show there are three key issues (as detailed above) as to why there is some delayed delivery of housing development within Mid Suffolk. In drawing conclusions from the identified key issues, it is apparent these focus around **land speculation**, which includes the business of developing or selling sites, **controlling interests** and **market conditions**, which are often the main areas beyond the Local Planning Authorities ability to control to manage. However, it also requires the private sector to deliver on planning permissions and requires communication between stakeholders and the Council, with transparency for understanding.

## **3. Key Actions and Responses**

- 3.1 This Mid Suffolk Housing Delivery Test Action Plan focuses on the timely delivery of new housing by setting out a range of practical, proportionate and proactive measures. This is to address low housing delivery rates, which will be monitored and reviewed.
- 3.2 The Joint Strategic Plan (2016-2020) recognises strategic outcomes, which includes housing delivery can only really be achieved through collaboration. As part of the corporate plan housing is a priority where continued focus and efforts will be sustained. The vision for housing priority is to ensure more of the right type of homes, of the right tenure in the right location. This vision is very firmly fixed in achieving sustainable development not development at any cost to the detriment of other necessary considerations.
- 3.3 The solutions below are the actions proposed in response to the identified key issues and challenges (early staller, condition staller and late-stage staller) mentioned earlier in this Action Plan.

### **A. Solution 1: Early Stallers:**

- I. **Engage regularly with the site promoters of 'Early Staller' sites** – more generally as part of this engagement, and as part of an ongoing relationship with site promoters. It will be important to understand, in a Mid Suffolk district context, how decisions are made about whether to sell a site once it has received outline planning permission or whether to seek reserved matters approval before selling the site. This will help to build up possible typologies of sites, which will form part of the monitoring process.
- II. **Memorandum of Understanding on Deliverability** – where necessary and prepared by two parties to address issues of deliverability in respect of the development at a particular site.
- III. **Update Mid Suffolk's local list of information required to support a planning application** – so that it includes a requirement for major outline planning applications (where all or most matters are reserved) to provide information regarding timescales and build out rates for the scheme. This will need to be proactively supported by case officers to ensure that the

information submitted is reasonable. For example, requests for viability requirements, timescales, build-out rates from applicants/agents to demonstrate a reasonable prospect for the site, if acceptable, will be developed and delivered.

**B. Solution 2: Condition Stallers:**

- I. **Providing a checklist and a sample of ‘model’ information for different conditions** in order to proactively assist applicants/agents by ensuring that they are clear about the level and type of information needed to enable the discharge of condition. Ongoing dialogue between the local planning authority and consultees/agents/developers is taking place to aid the process of discharging conditions and manage expectations. To ensure clear understanding between all of what type of condition is necessary and how the condition is to be worded and discharge is also clear. This in theory should help speed the discharge of conditions process up between information submissions, validation and discharge.

**C. Solution 3: Late-stage Stallers:**

- I. **Continue to closely monitor progress** with the build-out of sites and engage with developers in order to better understand the common types of issues which delay commencement once a site is ‘shovel-ready’.
- II. **Engage with all developers of sites with planning permission where there is only 12 months** to run before the permission expires. Try to understand what is needed to ensure that the permission gets built out.

**D. General recommendations:**

- 3.4 The data<sup>8</sup> has demonstrated that there are some common themes in the consideration of when and why sites stall. Consequently, three typologies of stalling have been identified and the following recommendations are made. It is also important to note the identified solutions and general recommendations directly interlink with the priorities of the Joint Strategic Plan 2016-2020 (also known as Corporate Plan), the emerging Joint Local Plan (Strategic planning) and the Homes and Housing Strategy 2019-2024, meaning the overall vision, function and delivery priorities are aligned within the organisation.
- I. Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out). The meeting should be an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.
  - II. Develop a framework for engaging on a more regular basis (than annually) with key market stakeholders – mainly land speculators, general developers

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<sup>8</sup> Mid Suffolk Stalled Sites Market Intelligence report (May 2019)

and housebuilders – to create and sustain better relationships. This could be part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application process.

- III. Given that it has been in place for over three years, it has had time to bed in and therefore applicants should be familiar with it and have a good appreciation of any issues it has created. This should be part of a greater willingness to have a more open conversation with regular promoters, investors and developers in Mid Suffolk.
- IV. As part of this conversation, seek to understand more about how the planning process (and any delays, perceived or real) affects decisions over land options.
- V. More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).

3.5 Added to the above it is important to include in this Action Plan recommendations for improving housing delivery contained in the Homes and Housing Strategy 2019-2024 and Homelessness Reduction and Rough Sleeper Strategy 2019-2024. These are as follows: -

- Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.
- Ensuring a smarter and improved pre-application process.
- Ensuring applications are approved on time and Section 106 agreements are signed off promptly.
- Discharging planning conditions promptly to ensure development can commence.
- Viability testing of proposed land allocations at plan making stage.
- Reviewing stalled sites to ensure blockages and delays to development are resolved.
- Creating a flexible approach to tenure mix to accelerate delivery.
- Developing new private homes through Council owned housing companies.
- Developing 200 new council homes in Mid Suffolk and 214 in Babergh through the Housing Revenue Account in the period up to 2022.
- Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards.
- Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.
- Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.

- Creating a stronger relationship with Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).
- Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts.
- Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.

3.6 It is apparent the progress and success of housing delivery is a collaborative process between both the public and private sector and communities. It is recognised Mid Suffolk District Council is undertaking a number of steps and measures as seen from the solutions and general recommendations earlier for delivery to be achieved. But, in reviewing all data and issues it is apparent Mid Suffolk Council plays a small but influential part in the delivery success process. The Council can continue to add value to the process by monitoring, reviewing and continuing engagement, measuring progress through this Housing Delivery Test Action Plan and any other relevant monitoring document.

## 4. Monitor, Review and Performance

- 4.1 This Action Plan will be reviewed and updated on an annual basis as part of the Council's joint annual monitoring report process and alongside the review of the Council's overarching Joint Homes and Housing Strategy.
- 4.2 The implementation of the identified actions will require collaboration across Council services areas and this Action Plan is to be recommended for adoption by Mid Suffolk District Council at Full Council.
- 4.3 The table below sets out how the actions together with timescales.

	<b>Measure</b>	<b>Objective</b>	<b>Intervention Activity and Status</b>	<b>Timescale</b>
1	Producing a Joint Local Plan to provide clear policy and direction to all involved with site allocations that are deliverable, supported by an Infrastructure Delivery Plan.	Providing clarity and certainty through the provision of a Joint Local Plan comprising development policies including those providing for land allocations together with a sound and evidenced Infrastructure Delivery Plan.	Work in progress.	Public consultation on the next version of the emerging Joint Local Plan anticipated in Summer 2019.

2	Ensuring a smarter and improved pre-application process.	Getting our pre-application process right first time such that application decision is consistent with pre application advice.	New revised scheme in place and being monitored.	Presentation of report to both Councils Cabinet in respect of revisions to existing scheme in March 2019. Continued monitoring subsequently to ensure that scheme is effective.
3	Ensuring applications are approved on time and Section 106 agreements are signed off promptly.	No delay to planning application determination.	Work in progress.	Ongoing and publication of statistics to confirm performance and outcomes.
4	Discharging planning conditions promptly to ensure development can commence.	No delays in the discharge of planning conditions.	Action Plan to be devised agreed and implemented to achieve outcome.	Ongoing and active monitoring in place but action plan needed given feedback to the Consultant for the Housing Delivery Action Plan/Unblocking stalled site project to achieve desired outcome.
5	Viability testing of proposed land allocations at plan making stage.	Appointment of Consultants who are reviewing the draft charging regime for Community Infrastructure Levy (CIL) together with the Infrastructure requirements of each land allocations to ensure that all site allocations are viable and therefore deliverable.	Work in progress.	To meet the Joint Local Plan and Infrastructure Delivery Plan timetable as set out above.

6	Reviewing stalled sites to ensure blockages and delays to development are resolved.	Development of a database and an approach to unblocking stalled sites. Production of a report which outlines intelligence around the housing market which will provide a foundation for the Strategy and which will comprise the Councils Housing Delivery Test Action Plans.	Work in progress.	Project work commenced with an amended Brief in December 2018 and with a completion date of end of May/ early June 2019.
7	Creating a flexible approach to tenure mix to accelerate delivery.	Production and adoption of Affordable Housing SPD linked to adoption of Joint Local Plan. Inclusive of guidance on Community-led housing, and specialist housing provision.	Action Plan required.	Timetable dependent upon progress of the JLP. To be reviewed when JLP timescale confirmed.
8	Developing new private homes through Council owned housing companies.	A programme to deliver 414 homes for the Councils' own affordable homes programme has been devised. Approx. 300 of these will be new build.	Work in progress.	3-5 year rolling programme has been devised.
9	Developing 200 new council homes in Mid Suffolk and 214 in Babergh through the Housing Revenue Account in the period up to 2022.	Ensure the delivery of the Affordable Homes Programme has the resources to deliver at speed. Aim to maximise the level of grants from various pots to ensure that the homes can be	Action Plan in place.	3-5 year rolling programme has been devised.

		subsidised and therefore let at an affordable /social rent. We will maximise the use of our own land/assets. We will engage with planners and consultants at an early stage to help increase the speed of delivery.		
10	Delivering a specific programme of housing development tailored to meet the needs of rural communities; this could include space standards, accessibility standards.	Strategic Housing Team will liaise regularly with Homes England to maximise Affordable Housing Programme investment into both Council areas.	Action plan required.	Obtain figures for each financial year and summarise at the end of each Homes England funding programme to Members. Apply for Community Housing Fund prior to December 2019.
11	Increasing the supply of Specialist and Accessible housing through enhanced policies within the Joint Local Plan.	Increase supply and delivery against assessed needs. Identification of needs data will assist in attracting delivery partners to provide a purpose-built scheme.	Action Plan required.	Plan for specific needs on a 3-year rolling programme in conjunction with commissioning partners.
12	Using compulsory purchase order powers, where appropriate, to unlock stalled sites and/or land allocations.	Investigate using these powers as part of the Strategy for unblocking stalled sites where circumstances dictate that this is an appropriate measure.	Work to be competed when appropriate and needed on a case by case basis.	Not a 'fixed' time piece of work. Circumstances of each case would determine whether there is a need to investigate further, consider use of Compulsory Purchase Order powers, then

				instigate and monitor. Ongoing.
13	Creating a stronger relationship with Homes England and optimise the funding streams for which we are eligible, including borrowing within the Housing Revenue Account (HRA).	Better engagement with Homes England should re-assure them of our councils' ambitions with regards to our own direct delivery. By giving confidence of delivery we are more likely to receive grant funding. By being clear on our programme and borrowing requirements gives the Development Team the chance to respond to opportunities available at short notice from developers.	Work in progress.	Ongoing.
14	Promoting and support the delivery of community-led housing schemes and formation of Community Land Trusts.	Continue to use the Community Housing Fund allocation from 2017 to support our communities to develop community-led housing initiatives. We will ensure the JLP includes policies which favours community-led housing. We will assist community groups to make applications to Homes England for Community Housing Fund grant in 2019.	Work in progress.	By the end of 2020/21 to have successfully funded the setting up of additional CLT's across the two districts.

15	Identifying opportunities to increase new homes supply with additional partners including for-profit housing associations.	To secure good working relationships with new partners to secure more certainty around affordable housing delivery. Encourage all partners to invest in our communities and secure new schemes.	Action Plan required.	By December 2019 for feasibility work. April 2020 to secure two suitable sites for pilot schemes.
16	<b>Early Stallers</b> (i) Engage regularly with the site promoters of “early staller sites”. (ii) Secure memorandums of understanding on deliverability. (iii) Update Local List of information required to support a planning application.	Focused engagement, enhanced processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
17	<b>Condition stallers</b> (i) Provide a checklist and a sample of “model” information for different conditions.	Focused processes to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
18	<b>Late stallers</b> (i) Continue to monitor build out of sites. (ii) Engage with developers of all sites with planning permission where there is only 12 months to run before the permission expires.	Focused engagement processes and monitoring to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
19	Hold an annual meeting with key market stakeholders, particularly those representing land speculation interests (where the evidence in this report suggests sites commonly stall because they need to be sold on before being built out).	Improved engagement with an opportunity to share information on issues with the planning process, the current state of the market and important updates on policy approaches.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
20	Develop a framework for engaging on a more regular basis (than	Improved engagement which could be	Action Plan to implement this measure will be	Prior to the annual review of this Housing Delivery

	annually) with key market stakeholders – mainly land speculators, general developers and housebuilders – to create and sustain better relationships.	part of developing a template for a Memorandum of Understanding for handling planning applications. This would be distinct from a Planning Performance Agreement but would establish what is expected of both parties at different stages of the application process.	required.	Test Action Plan.
21	Undertake a survey of key market stakeholders on attitudes to CIL, particularly among major site promoters. In particular, this should seek to understand what impact the CIL charge is having.	Better engagement and an opportunity to consider responses as part of the current CIL Review.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan and as part of the current CIL Review which is occurring alongside the Joint Local Plan.
22	As part of the engagement process with stakeholder gain further detailed information about how the planning process (and any delays perceived or real) affects decisions over land options.	Better engagement and an opportunity to consider responses as part of the Review to this Housing Delivery Test Action Plan.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.
23	More actively link Registered Providers with land promoters so that the promoters can better understand the issues that could arise in the future (and which potentially influence the thinking of developers that would otherwise be purchasing and taking forward those sites).	Better engagement to achieve improved housing delivery.	Action Plan to implement this measure will be required.	Prior to the annual review of this Housing Delivery Test Action Plan.

4.4 A thorough review of this annually will include updating of data, housing delivery performance figures from all sources, any changes to market intelligence and an analysis of outcomes and achievements in respect of all actions reviewed

## 5. References

5.1 The following data has been used in this document:

- Mid Suffolk stalled sites database (June 2019) and summary
- Mid Suffolk Stalled Sites Market Intelligence report (May 2019)
- Mid Suffolk Housing Land Supply Position Statement 2018/19 (March 2019)
- Babergh & Mid Suffolk Joint Annual Monitoring Reports 2015 – 2018
- Joint Strategic Plan 2016 – 2020 (also known as Corporate Plan)
- Homes and Housing Strategy 2019 – 2024 and Homelessness Reduction and Rough Sleeper Strategy 2019 – 2024

## 6. Appendix 1

6.1 The appendix to this document comprises the summary of the Council's Stalled sites database (June 2019).

### A. Methodology used for database construction

6.2 In order to construct a database the following premise was used:

A development site which has all the necessary approvals for housing development (full planning permission, reserved matters approval, conditions discharged) but for whatever reason has not yet commenced on site and is therefore categorised as stalled.

6.3 Current position on working database:

A site can be stalled at different stages of its progress through the planning process phases, such as: -

- a. 'Early staller': Before full planning permission is granted
- b. 'Conditions staller': The period between the grant of full planning permission and all conditions having been discharged, i.e. ready for construction
- c. 'Late-stage staller': After the point at which construction can commence

6.4 For the purpose of this exercise, the planning process is broken down into 3 phases:

Phase 1 - Outline Planning Permission to Full Planning Permission or Reserved Matters

Phase 2 - Full Planning Permission or Reserved Matters to all pre-commencement conditions being discharged

Phase 3 - Under construction to completion

6.5 At each phase, a site could be assessed as stalled, after a timeframe which is deemed reasonable for progression from one phase to the next. At each phase, a "reason" for the site to be stalled has been devised to establish a stalled site category, such as:

At phase 1:

- A) No detailed permissions to enable a commencement to occur.
- B) Site for sale or in process of being sold.

At phase 2:

- A) No known condition discharge.
- B) Condition discharge occurring, yet no start date planned.
- C) Condition discharge occurring, and planned start on site but no start yet.
- D) No known condition discharge due to known impediments for commencement.
- E) No known condition discharge as site for sale or in process of being sold.

At phase 3:

- A) Work has started on site, however development has stopped/stalled.
- B) Construction progressing – monitoring only.

**B. Table 1: Summary of number of Planning Permissions and dwellings permitted by typology – May 2019**

		Phase 1: Early stallers		Phase 2: Condition stallers					Phase 3: Late-stage stallers		
		A) No detailed permissions to enable a commencement to occur	B) Site for sale or in process of being sold	A) No known condition discharge	B) Condition discharge occurring, yet no start date planned	C) Condition discharge occurring, and planned start on site but no start yet	D) No known condition discharge due to known impediments for commencement	E) No known condition discharge as site for sale or in process of being sold	A) Work has started on site, however development has stopped/stalled	B) Construction progressing – monitoring only	Totals
Mid Suffolk	Number of Sites	31	2	11	8	-	1	1	1	22	77
	Number of Dwellings	1,931	66	1,099	1,079*	-	74	10	13	1,952	6,224

\*Please note: Land North of Chilton Leys, Chilton Leys, Stowmarket total of 600 dwellings under outline, 175 dwellings under Reserved Matters.