

Proof of Evidence of Harry Bennett

MPlan MRTPI

Land at Ixworth Road, Thurston

Planning Inspectorate No. Appeal:
APP/W3520/W/23/3317494

Mid Suffolk District Council Application No.
DC/19/02090

06 June 2023

LICHFIELDS

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1.0 **Qualifications and Experience**

1.1 My name is Harry Bennett. I am an Associate Director at Lichfields having joined the company in September 2016. I attended the University of Sheffield where I studied the Urban Studies and Planning (MPlan) integrated masters course, for which I received First-Class Honours. I am a Member of the Royal Town Planning Institute.

1.2 Lichfields is one of the UK's largest and longest established independent planning consultancies and most recently won the 'RESI – Consultancy Practice of the Year 2023' award. In addition to general planning work on individual development projects, I have extensive experience in advising on matters relating to five-year land supply. I have also recently appeared at the Examination in Public for the Greater Norwich Local Plan.

1.3 I understand my duty to the Inquiry and have complied, and will continue to comply, with that duty. The evidence that I have prepared and provide for this appeal is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed in this proof of evidence are my true and professional opinions.

2.0 Introduction and Scope of Evidence

Introduction

2.1 This Inquiry relates to the appeal by Gladman Developments Limited ('the Appellant'). This is in respect of an appeal against non-determination of an application seeking outline planning permission (with some matters reserved) by the Council ('Mid Suffolk District') for the erection of up to 210 dwellings (alongside other associated development) at 'Land at Ixworth Road, Thurston'.

Scope of my evidence

2.2 The scope of my evidence is concerned with the Council's emerging Joint Local Plan ('JLP'), specifically the methodology for its housing trajectory. In addition, I consider the supply of homes coming forward in and around the settlement of Thurston as well as other factual points regarding housing need and supply in Mid Suffolk District and Thurston specifically.

2.3 I comment on these matters in the context that:

- Lichfields advised the Council on the preparation of the JLP housing trajectory originally submitted for examination (CD 8.1);
- Lichfields has prepared the Council's three previous 'Five-Year Housing Land Supply' ('5YHLS') positions (2020, 2021, and 2022 positions). The Council's latest 2022 5YHLS position (CD 10.10) – 10.88 years – is an agreed matter (Paragraph 2.3.1 of the SoCG) and I have used this supply information to determine supply coming forward in Thurston and other settlements; and
- While Lichfields did not advise the Council on the preparation of its more recent Main Modifications JLP housing trajectory (CD 8.5), it was based upon the Council's 2021 5YHLS report which, as aforementioned, was prepared by Lichfields.

2.4 When I refer to “we” in this proof, I am referring to the work that Lichfields – via a team that included me – carried out for the Council on the above. I do not address any issues of planning policy or the weight to be accorded to considerations in the planning balance, which are addressed by Mr Steven Stroud.

Structure of my evidence

2.5 My evidence is set out as follows:

- **Section 3.0** – Considers the Council’s Joint Local Plan Trajectory;
- **Section 4.0** – Sets out the housing supply expected to come forward in Thurston compared to other settlements in the District.
- **Section 5.0** – Sets out factual information regarding housing need and delivery in Mid Suffolk and Thurston.
- **Section 6.0** – Conclusions.

3.0 Mid Suffolk's Joint Local Plan Trajectory

Regulation 19 JLP Trajectory

- 3.1 Lichfields supported both Mid Suffolk and Babergh District Councils in preparing the housing trajectory published for the Regulation 19 draft JLP (consulted upon between 12th November to 24th December 2020) (CD 8.1). The Regulation 19 JLP was subsequently submitted for examination in March 2021. This trajectory was prepared concurrently with the Council's 2020 5YHLS position (also prepared by Lichfields). I was directly involved in both engagements.
- 3.2 During the examination of the submitted plan, the Inspectors raised several concerns related to the Settlement Hierarchy, the Spatial Distribution of Housing, and the Housing Site Selection Process (Matter 4). On the 9th December 2021, the Inspectors wrote to the Councils advising that a more fundamental review of the approach taken to the aforementioned matters was required. In doing so, the Inspectors noted:
- “across the two districts, around 90% of the housing requirement figure detailed in policy SP01 is already provided for by existing completions, sites under construction, sites with full or outline planning permission, sites with a resolution to grant planning permission subject to s106 agreement, allocations in made Neighbourhood Plans and the, reasonable, allowance for 1,000 windfall dwellings. This unusual situation means that demonstrating a supply of developable housing land for the vast majority of the plan's overall housing requirement figure is, for some years to come, unlikely to be dependent on the allocation of the housing sites included in the submitted plan.” (Para 7, G08) (CD 8.7)*
- 3.3 As a result of the above conclusions, the Inspectors recommended that policies allocating sites should be deleted (alongside other policies) absent which

housing needs could largely be met without any need for any change to existing settlement boundaries, and a new 'Part 1' plan could be progressed on that basis. This would be followed by a 'Part 2' plan that included a new settlement hierarchy and a new spatial distribution of any new housing allocations which might be necessary to provide flexibility and ensure that the plan period housing targets can be met. This approach is consistent with a genuinely plan-led approach (in accordance with Paragraph 15, NPPF, 2021).

3.4 In helping to prepare the Council's Regulation 19 JLP trajectory (CD 8.1), Lichfields applied the methodology detailed below. For context, that trajectory was prepared in late Summer 2020 after the first Covid-19 lockdown during a period when there were localised restrictions in place nationally but before the second lockdown (announced 31st October 2020). The plan-period covered was from 2018/19 to 2036/37 with the initial five-year period of this first trajectory starting 1st April 2020.

3.5 In helping to prepare the trajectory, we considered the following:

- **Lead-in time / build rate analysis:** Lichfields undertook a local lead-in time and build rate analysis supplemented by reference to Lichfields' 'Start to Finish' (2nd Ed) report (2020) ('StF') (CD 10.12). StF was used to benchmark local rates and to determine when very large sites would come forward and deliver in the absence of local evidence.
- **The impact of Covid-19:** Taking together local and national evidence Lichfields recommended that the Council applied a 45% discount to expected delivery/output in 2020/21. In addition, there were a number of sites that would normally have been expected to start delivering homes in 2020/21 based on local lead-in times. We recommended that any such site's delivery should be pushed back to start delivering on 1st April 2021 to account for a likely delay in commencement.

3.6 Next, we considered how sites with and without a planning permission were dealt with in the trajectory:

- **Sites with planning permission:**

For any site with an existing planning permission (be it an emerging allocation or not), we applied median build rates taking account of the Covid discount/delay. We used the site-specific evidence gathered both as part of the 5YHLS exercise (described below) but also the initial ‘call for sites’ exercise to determine whether a site was ‘deliverable’ (i.e. delivery in the first five-years) or ‘developable’ (i.e. delivery from year six onwards); noting the different evidential thresholds for each site test.

In essence, the same process was undertaken to determine whether a site was ‘deliverable’ as per the 5YHLS methodology (detailed below).

- **Emerging allocations and sites without planning permission:**

Across both Babergh and Mid Suffolk, there were 108 emerging allocations without an extant permission. As a starting point, all these sites were considered ‘developable’.

Sites below 100 units:

We assumed delivery of the first dwelling in year eight (2025/26 – i.e. the year after the first five-year period) of the JLP trajectory, absent evidence to the contrary. This reflects a lead-in time of c. three years locally for an application of this scale (median amounts to 2.7 years and mean 3.3 years), and also factors in the assumption that an application is not imminent (i.e. allowing two years for one to be compiled and submitted).

Sites of 100-499 units:

The local lead in times for these sites were slightly longer (mean of 3.4 and median of 3.3 years). Also allowing for the fact that an application (i.e. the start of the lead in time calculation) is not imminent, we have applied the conservative position that development of the first dwelling would come in

year ten (2027/28) for sites between 200 to 499 units and from year nine (2026/27) for sites between 100 to 199 units in the JLP trajectory.

For sites of 500 units or more (of which there are few) we suggested that bespoke lead-in times would be required based on evidence to be prepared for the JLP examination. As an initial starting point, we used StF analysis in lieu of local evidence and assumed these sites would start delivering from 'year 11' (2028/29).

- 3.7 Once prepared, the Council took our trajectory and made some minor amendments to specific sites based on more up-to-date information ahead of submission. This reduced the Council's supply from our own concluded figure and was immaterial to the overall examination.

The JLP Main Modifications trajectory

- 3.8 The Council has now published its proposed Main Modifications to the submitted JLP to deliver a 'Part 1 Plan' as recommended by the Inspectors (the recent consultation of which concluded on 3rd May 2023). These main modifications included the deletion of the Appeal site as an allocation – alongside other proposed allocations – and a new revised trajectory has been prepared.
- 3.9 While Lichfields did not advise the Council on the preparation of this trajectory the Council has informed me that the figures for the first five-years were based on the 2021 Lichfields 5YHLS report¹ (a project I was involved in). I therefore set out below the methodology underpinning the Council's 5YHLS positions.

¹ I have been informed that the Council did not use the 2022 5YHLS figures to prepare its JLP Main Modifications trajectory (CD 8.5) because most of the work to prepare the Main Modifications version of the plan in November 2022 while the 2022 5YHLS position (CD 10.10) was published in December 2022. A decision was then taken to keep the base date as 2021 was to try to remain consistent with the data previously supplied to the Inspectors (including that which the Inspectors concluded upon in their 9th December letter that "*demonstrating a supply of developable housing land for the vast majority of the plan's overall housing requirement figure is, for some years to come, unlikely to be dependent on the allocation of the housing sites included in the submitted plan*" (CD 8.7).

What is the methodology underpinning the Council’s 5YHLS position?

3.10 Lichfields has prepared the Council’s three previous 5YHLS positions. These reports have covered three five-year periods (all with base dates of the 1st April in a given year) and our assessments show that the Council’s supply position has been strengthening (as shown in Table 3.1 below).

Table 3.1 Mid Suffolk District Council’s 5YHLS Positions (prepared by Lichfields)

Five-Year Period	2020/21 to 2024/25	2021/22 to 2025/26	2022/23 to 2026/27
Lichfields Concluded Supply	7.67 Years	9.54 Years	10.88 Years

Source: Mid Suffolk District Council’s 5YHLS Positions Published 2020, 2021, and 2022.

3.11 In preparing all these assessments of deliverable supply, the methodology used has – in essence – been consistent across all three reports. The only change in methodology has been to account for the impact of the Covid-19 lockdowns and other such restrictions on housing delivery (something no longer considered necessary to account for).

3.12 The below steps were taken to arrive at the Council’s 5YHLS positions:

- **Stage 1: Calculating the five-year requirement**

First, Lichfields calculated the Council’s appropriate housing requirement using the ‘latest’ inputs to the standard method (i.e. using the methodology defined and data linked in the PPG – ID: 68-004). The buffer was determined using the latest Housing Delivery Test with no backlog added in accordance with the PPG (ID: 68-031).

- **Stage 2: Sites data inputs and validation**

Next, we processed the Council’s data on sites with extant planning permissions. This data was held by the Council and validated by officers visiting as many sites as possible to confirm where sites were either delivering homes, had recently commenced, or were extant but not

implemented. We then processed this data by sorting sites in to ‘Category A’ (commenced and not commenced) and ‘Category B’ (i.e. allocations, sites with outline permission, and those with a resolution to grant subject to a S106) with reference to the definition of ‘deliverable’ (Annex 2, NPPF 2021).

As a precaution, the following two types of sites were removed from our assessment:

1) Sites not commenced where planning permission would have expired by the assessment’s base date:

It was assumed that these sites had expired unless there was evidence to the contrary given officers had recently undertaken site visits.

2) Commenced non-major sites with ‘older’ permissions:

This was defined as those sites that would have expired one year before the base date of the 5YHLS assessment. These non-major sites would have had at least a year to deliver homes, but none had been forthcoming, and were therefore removed as a precaution.

• **Stage 3: Assessing deliverability**

Our approach to assessing deliverability brings together policy, guidance, and planning precedent. It builds on Lichfields’ wider experience – including for evidence considered at S78 planning appeals – to arrive at what I consider to be a robust framework to assess:

- 1) Whether a site is ‘deliverable’ – with reference to the evidential requirements to demonstrate a site as being so; and
- 2) If it is deliverable, when the site might reasonably come forward and then build out at what rate.

To determine when, and at what rate, sites come forward, we undertook an assessment of local lead-in times and build rates (as per the JLP Trajectory

methodology). These were benchmarked against and supplemented by our own StF report (2020).

To determine the deliverability of the initial long lists of ‘Category A’ and ‘Category B’ development we undertook the following process:

Category A sites:

We presumed these sites were deliverable (in accordance with the PPG – ID: 68-0078 – and definition of deliverable) and we initially applied local median lead-in times and delivery rates². For larger Category A sites, a proforma was sent out to developers/promoters to gather their opinion on the site’s delivery. It was only where there was clear evidence to suggest these sites may not be deliverable that Category A sites were excluded. For example, we undertook an initial background review of each major Category A consent not already delivering homes to consider whether there was any reason to suggest it might not be deliverable.

Category B sites:

The Council sent a proforma to all relevant landowners, developers, and promoters. This proforma (which can be seen at Appendix 2 of the latest 2022 5YHLS report (CD 10.10)) sought to ascertain a variety of site-specific evidence that, taken together, will be of a high-evidential value sufficient to demonstrate the deliverability of a full range of Category B sites where they are to be included. The contents of that proforma were then critically reviewed before concluding on the site’s deliverability and rate of delivery/lead-in time.

In addition, any site with an extant outline permission and a pending reserved matters application submitted prior to the base date was considered deliverable. Median lead-in times and delivery rates were

² The median was applied rather than the local average because this gave the lead-in times and rates for the ‘mid-point’ scheme (accounting for distribution in the data).

applied unless the evidence provided by respondents to the proforma was considered to justify a different input.

- **Stage 4: Windfall analysis**

Next, we concluded a review of whether a windfall allowance was appropriate and if so, what that allowance should be. We have concluded in all three positions that there was compelling evidence for the inclusion of a small site windfall allowance applied only in Years 4 and 5 to avoid double counting with extant permissions.

- **Stage 5: Concluding the 5YHLS position**

Bringing the above together, we concluded on the Council's 5YHLS position. We also undertook some scenario testing to show that the Council would still be able to demonstrate a supply if its buffer changed, if a small site lapse rate was applied, and lower delivery rates were used.

- **Stage 6: Public consultation**

Finally, all Lichfields' 5YHLS reports prepared for the Council have undergone a public consultation. This consultation sought responses regarding the concluded position, the methodology, and the sites included (and not included) as contributing to the deliverable supply. The responses were gathered and taken into account in the final position reported.

3.13 I consider the approach taken above to determine the Council's 5YHLS position – with reference to the relevant policy tests, planning guidance, and planning precedent – has been robust and the figure concluded to be reliable.

How was the 2021 5YHLS position applied to determine the Council's JLP Main Modifications trajectory?

3.14 I have been informed that the approach taken by the Council to arrive at the latest Main Modifications trajectory was as follows:

- **Deliverable period: (2021/22 to 2025/26)**

The Council took the trajectory from Lichfields 2021 5YHLS report (CD 10.9) – arrived at using the methodology described above – and inputted this into the new trajectory.

- **Developable period: (2026/27 to 2036/37)**

For the remaining ‘developable’ period of the trajectory, the Council added together all its committed supply (extant planning permissions, made neighbourhood plan allocations, and sites with a resolution to grant permission subject to a S106 that have since gone on to gain permission) plus its windfall allowance and netted off the expected delivery in the first five years (taken from Lichfields 2021 5YHLS report (CD 10.9)). This supply is then assumed to come forward in years six to ten after the base date.

The Council has confirmed that the appeal site did not form part of this supply.

3.15 In the context of the JLP and in the Inspectors’ conclusions, I consider the Council’s approach to the preparation of its Main Modifications trajectory to be reasonable. In particular, I consider that both the methodology underpinning the delivery expected in the first five years and the figure itself to be robust in the context of plan-making. The remaining supply expected – based on the Council’s published figures – is that supply which the Council considers to have a reasonable prospect of coming forward.

3.16 Even if there was variance in the overall figure in the Main Modifications JLP Trajectory, we consider there is a realistic prospect that the vast majority of the supply identified within it will be delivered within the plan period. I come to this conclusion noting the strong supply expected in the first five-year period of that trajectory as per the 2021 5YHLS position (CD 10.9) (which I consider to be a robust report). Moreover, the 2022 5YHLS report (CD 10.10) has

reconfirmed that strong supply is expected to continue and the conclusions of that report are an agreed matter (Paragraph 2.3.1).

3.17 Given these two 5YHLS reports apply the same methodological approach and the output of one is agreed by the Appellant, there can be no basis for questioning the supply figure in the first five-years concluded in the Main Modifications JLP trajectory (CD 8.5) and the general scale of delivery in the plan-period is not being questioned.

4.0 **The Supply of Homes in Thurston**

4.1 Using the latest 2022 5YHLS report (published December 2022) (CD 10.10), Table 4.1 below sets out the expected supply of affordable and market homes that are anticipated to come forward in Thurston. I have also analysed the latest Census 2021 to understand the existing number of homes in the village. My analysis finds that:

- According to the 2021 Census, there were an estimated 1,494 homes in Thurston³ as of March 2021 (see 4.1 and Figure 4.1 below).
- Between 1st April 2022 and 31st March 2037, an additional 881 homes are expected to be delivered in and around the village. This is from 16 sites with an extant planning consent (eight major, eight minor sites). This does not include supply from the appeal site;
- Of the total housing figure with an extant permissions, 797 homes are expected to be delivered by 31st March 2027 (based on local lead-in times and delivery rates);
- Of these 16 sites, 11 have commenced (expected to deliver 541 homes in total);
- Of the total figure, 291 homes are expected to be affordable homes (33%) with the remaining 590 being market (67%).

³ Census 2021, Dataset RM204.

Table 4.1 Expected Supply coming forward in Thurston

Category of Supply (@ 1 st April 22)	No. Sites	Delivery Expected: 1 st April 22 to 31 st March 37		
		Assumed Affordable Homes to be delivered	Assumed Market Homes to be delivered	Net Outstanding Dwellings (1 st April 2022)
Category A: Commenced	11 (5 major, 6 minor)	174	367	541
Category A: Not Commenced	2 (2 minor)	0	2	2
Category B: (Deliverable)	2 (2 major)	112	211	323
Category B: (Not Deliverable)	1 (1 major)	5	10	15
Total	16	291	590	881

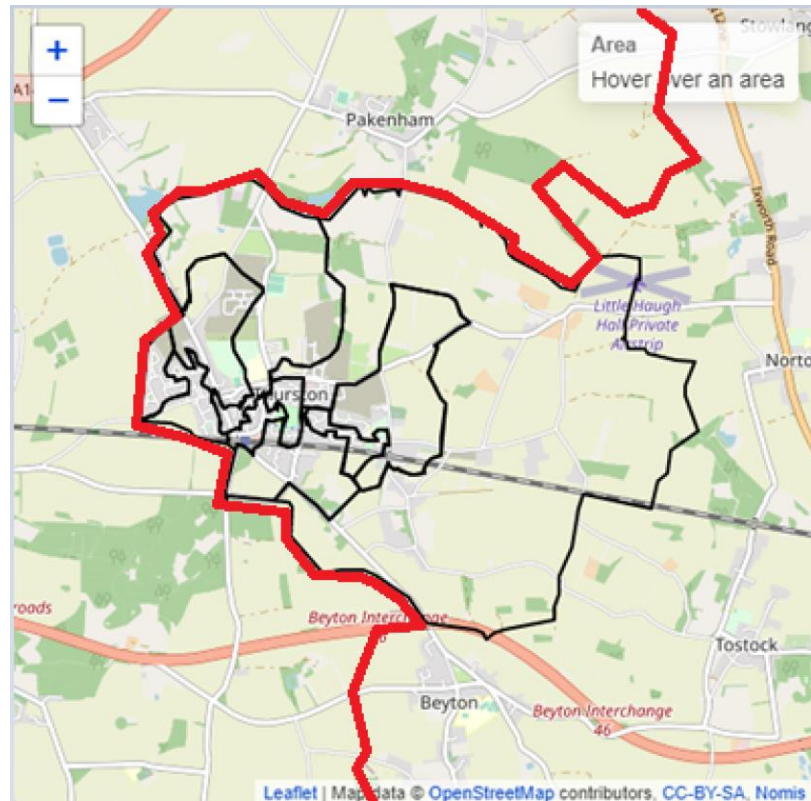
Source: Lichfields Assessment of Mid Suffolk 5YHLS 2022 (CD 10.10)

Table 4.2 Estimated No. Dwellings in Thurston

Output Areas making up Thurston (see Figure 4.1)	Estimated No. of Dwellings (2021)
E00153345	142
E00153346	127
E00153347	132
E00153348	188
E00153349	140
E00153350	153
E00153351	146
E00153352	133
E00153353	160
E00153354	173
Total	1,494

Source: Census 2021

Figure 4.1 Output Areas Selected to Estimate Thurston No. of Dwellings and broad Mid Suffolk boundary



Source: 2021 Output Areas (NOMIS), Lichfields amends (showing boundary of District)

4.2 To put these figures in context, I have reviewed the supply in broadly similar settlements within Mid Suffolk: Elmswell, Woolpit, Needham Market, and Great Blakenham. These are all settlements that sit on the same rail and road corridor. I have also looked at supply coming forward in Stowmarket as one of the principal settlements of the District. These six settlements combined are expected to deliver 53% of the total growth expected to occur in the District as per the latest 5YHLS position (3,218 homes compared to a total deliverable supply of 6,043 homes).

4.3 Table 4.3 below shows that Thurston is expected to grow – based on existing commitments by 59% to 2037 (the majority of that growth occurring by 31st March 2027. Woolpit is expected to growth by a similar proportion (58%) but with fewer homes delivered in absolute terms. As a settlement, more homes are expected to be delivered in Thurston than the principal and much larger

settlement of Stowmarket. Thurston is also the location where, of the settlements reviewed, the most affordable housing (in absolute terms) will be delivered.

4.4 Appendix 1 provides a breakdown of the supply expected to come forward in each settlement.

Table 4.3 Comparison of expected supply coming forward

Settlement	Existing No. Dwellings (2021 Census)	Homes Expected to be Delivered Between 1 st April 2022 and 31 st March 2037	Of which are Market	Of which are Affordable	Expected Growth From Commitments Compared to Existing Settlement Size (By 2037)
Thurston	1,494	881	590 (67%)	291 (33%)	+59.0%
Stowmarket	11,451	831	622 (75%)	209 (25%)	+7.3%
Woolpit	973	567	394 (69%)	173 (31%)	+58%
Elmswell	1,868	446	309 (69%)	137 (31%)	+24%
Needham Market	1,639	370	309 (84%)	61 (16%)	+23%
Great Blakenham	1,095	123	77 (63%)	46 (37%)	+11%

Source: Lichfields Assessment of Mid Suffolk 5YHLS 2022 (CD 10.10), Lichfields Assessment of Census 2021

4.5 Regarding the expected supply figures for the village of Thurston and other settlements:

- To conclude on the supply expected to come forward in and around each settlement, we have first taken together all sites within each relevant Parish (as identified in the 2022 5YHLS trajectory⁴ (CD 10.10)). We have

⁴ The trajectory follows the 5YHLS report: <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/AMR/5HLS-2022/Mid-Suffolk-2022-5HLS.pdf>

then reviewed the location of each site in relation to that settlement and only included sites that are immediately adjacent to the built-up boundaries of each settlement (for Thurston, we have done this with reference to the Thurston settlement boundaries as per the made ‘Thurston Neighbourhood Plan’ (2019) (CD 7.7)) or other sites that would reasonably be considered to be part of that settlement.

- For Thurston, the settlement is wholly within Mid Suffolk District but the very western edge of the Village forms the boundary with neighbouring West Suffolk (see Figure 4.1 above – the District boundary is shown in red). We have reviewed the planning register for West Suffolk and there are no planning applications either submitted or approved on land adjacent to the village. There is a single cross boundary site (Land Adjacent To Fishwick Corner⁵) but this site is primarily within Mid Suffolk. The development in West Suffolk on this site relates to highways improvements rather than the housing element, all of which will be built in Mid Suffolk.
- For affordable housing supply, we have assumed that sites already commenced will continue to deliver affordable homes proportionate to the total number of homes delivered in a given year and the percentage of affordable homes granted. For example, if a site was approved with a contribution of 40% affordable housing and delivered at a rate of 100 dwellings per annum, we would assume it delivered 40 affordable homes and 60 market homes in a given year. Figures have then been rounded down.

⁵ Mid Suffolk ref. DC/19/03486

5.0 General Housing Need and Delivery Details

5.1 The below sets out contextual details regarding housing need and delivery (both of market and affordable) in Mid Suffolk and Thurston.

Mid Suffolk

- 1 **Housing need:** The Council's proposed housing requirement for the District is 535 dwelling per annum ('dpa') (equating to a minimum delivery of 10,165 homes to 2037) as per Policy SP01 in the Main Modifications JLP (CD 8.5).
- 2 **Housing delivery expected as per the Council's latest 5YHLS position:** The Council's latest 2022 5YHLS position (CD 10.10) concludes a 'deliverable' supply of 6,043 homes (Table 6.3, 2022 5YHLS Report (CD 10.10)). Of the sites concluded deliverable, they are expected to deliver a total of 6,733 homes within the plan-period (i.e. supply within the five-year period and beyond it to 2037⁶).

In addition, there are a further 846 homes on sites identified within the 5YHLS position, that may come forward in the plan-period, but were on sites concluded to not be 'deliverable' in the 2022 5YHLS assessment given a lack of 'clear evidence'⁷ (See Pages 82 to 84 of the 2022 5YHLS Report (CD 10.10)). These were sites either pending a S106 to be signed or had an outline planning permission.

In total then, the 2022 5YHLS report identifies sites within the district that could deliver 7,579 homes within the plan-period; representing 74.6% of the total housing requirement to 2037 as per Policy SP01.

⁶ This accounts for sites that are expected to deliver within and beyond the latest five-year period.

⁷ This does not include delivery from site 'DC/18/04856/OUT' (10 homes). This site had a resolution to grant planning permission at the base date but has since been refused. The other sites in this category have since been approved.

- 3 **Affordable housing need:** The Council’s latest ‘Strategic Housing Market Assessment’ (‘SHMA’) Part 2 Update (2019)⁸ (CD 8.13) assesses the housing needs of the District for the period 2018-2036. The SHMA (published in 2017 with a partial update in 2019) indicates that there is a need for 127 new affordable homes in Mid Suffolk per annum. This is calculated within the SHMA as 22.7% of the total needs of the District (565 dpa) being for affordable tenures, as per paragraphs 7.23 to 7.27.
- 4 **Affordable housing delivery:** Delivery of affordable housing in Mid Suffolk within the emerging JLP plan period is set out in Table 5.1 below. This data is taken from the Council’s latest joint Annual Monitoring Report (2021-2022) (‘AMR’) (CD 10.6).

Table 5.1 Affordable housing delivery in the emerging JLP Plan Period

	Affordable housing need (as per Council’s latest SHMA)	Affordable housing delivery	Difference
2018/19	127	118	-9
2019/20	127	128	+1
2020/21	127	193	+66
2021/22	127	196	+69
Total	508	635	+127

Source: Ipswich Housing Market Area: Strategic Housing Market Assessment – Partial Part 2 update (2019), Table 10 BMSDC AMR (2021-2022)

- 5 **Affordable housing supply:** We estimate that (based on the sites identified in the Council’s latest 5YHLS position) there are 2,026 affordable homes on major development sites with permission in the plan-period (from sites both concluded ‘deliverable’ and ‘not deliverable’ at the point of the 2022 5YHLS Report’s preparation)⁹. Of these, 1,767 are expected to be delivered on sites identified as ‘deliverable’; of which 1,624

⁸ <https://www.babergh.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/E-EvidenceBase/Housing-EH/EH05-SHMA-Part-2-update-2019.pdf>

⁹ This does not include delivery from site ‘DC/18/04856/OUT’ (10 homes). This site had a resolution to grant planning permission at the base date but has since been refused. The other sites in this category have since been approved.

are expected to be delivered by 31st March 2037 (i.e. from sites identified as ‘deliverable’),

- 6 **Mid Suffolk Housing Register:** Based on information supplied to Lichfields from the Council and drawn from Gateway to Homechoice – the area’s choice-based lettings system – there are currently 624 households seeking rented accommodation compared to the 1,767 homes expected to be delivered by 31st March 2027 (based on the Council’s latest 5YHLS position).

Thurston

- 7 **Housing supply:** As per my assessment in Section 4.0 of this Proof, 881 homes are expected to come forward in Thurston by the end of the emerging JLP plan-period (i.e. 31st March 2037). Of this total, 797 homes are expected to be delivered by 31st March 2027 (i.e. the end of the current five-year period).
- 8 **Affordable housing supply:** As per my assessment in Section 4.0 of this Proof, of the total 881 homes expected to come forward in Thurston, 291 of those homes are of an affordable tenure (33%).
- 9 **Mid Suffolk Housing Register:** Based on information supplied to Lichfields from the Council and drawn from Gateway to Homechoice – the area’s choice-based lettings system – there are currently 28 households seeking rented accommodation on Mid Suffolk’s Housing Register who have some form of local connection to the village of Thurston. This compares to the total number of affordable tenure homes to be delivered in Thurston by 2037 of 291 homes (most of which will be delivered in the shorter term to 31st March 2027).

5.2 The relevance of the points I raise above to this appeal is dealt with in Mr Steven Stroud’s Proof of Evidence.

6.0 Conclusions

- 6.1 My evidence has considered the methodology underpinning the Council's Main Modifications JLP Trajectory (CD 8.5) as well as the supply of homes coming forward in and around the settlement of Thurston and other factual points regarding housing need and supply in Mid Suffolk District and Thurston specifically.
- 6.2 This evidence responds to points raised in Sections 3.0 and 4.0 of the Council's Statement of Case (CD 10.3), namely, the housing supply in the District (Paragraph 3.8) and matters relating to the JLP trajectory (i.e. Paragraphs 4.4 to 4.11). In doing so, I have also considered the Council's latest 5YHLS position (published December 2022) (CD 10.10). While the figure concluded in that position – 10.88 years – is an agreed matter, my evidence has considered the underlying report because:
- 1 The methodology underpinning this report (which again, the conclusions of which are agreed) was in essence the same as the 2021 Lichfields 5YHLS report (CD 10.9) that the Council used to prepare its Main Modification JLP trajectory (CD 8.5); and
 - 2 I have reviewed the trajectory in the 5YHLS report to determine the supply coming in Thurston and other settlements in the District. I have also considered the estimated affordable housing supply coming forward as well based on the sites included in the 5YHLS position.
- 6.3 Furthermore, in the context of my evidence I note the below points raised in the Appellant's Statement of Case (CD 10.2).
- 6.4 Firstly, the Appellant notes at Paragraphs 2.2.1 and 2.2.2 that:

“At the time permission was resolved to be granted and the Section 106 obligation was signed, the Council could demonstrate a supply of housing in excess of five years. This position has not changed and the Council is still able to demonstrate a supply of housing in excess of five years.” (Paragraphs 2.2.1 and 2.2.2, Appellant’s Statement of Case) (CD 10.2)

6.5 While that statement is correct – that the Council’s 5YHLS was and remains above 5YHLS – the position has markedly increased. On the 20th September – when the Council resolved to grant permission – the Council’s 5YHLS position was 5.66 years as per the published ‘2019 Mid Suffolk District Housing Land Supply Position Statement’ (published September 2019) (CD 10.11)¹⁰. This report was prepared by the Council. The Council’s agreed position is now 10.88 years as per the latest 2022 5YHLS report (CD 10.10).

6.6 Secondly, the Appellant notes that:

“It will however be necessary for the Council to continue to grant planning permissions for the time life of its plan period as supply will drop off once these developments granted have been constructed.” (Paragraph 2.2.3)

6.7 In noting the above, the Council will need to continue to monitor and manage its housing supply going forward; however, it is not clear at this point in time that this will necessarily lead to the Council needing to grant additional planning permissions in the course of delivering its local plan aspirations. The Council’s chosen approach is to continue with its Local Plan process whereby a Part 2 plan will be adopted in Winter 2025 (as per the latest Local Development Scheme (October 2022)(CD 8.14)). At this point the Council will have the option to allocate more sites, should it need to, based on the picture of both ‘need’ and ‘supply’ at that point in time; consistent with the ‘plan-led’ approach advocated in the NPPF (Paragraph 15).

¹⁰ While this was the Council’s latest 5YHLS position at the point at which the resolution was made, the Council had consulted upon Lichfields 2020 5YHLS Report from 14th August to 14th September 2020. This report, once published following consultation (in October 2020), showed the Council’s supply as being 7.67 years.

Appendix 1 Housing Supply in Thurston and other locations

Thurston

Category A: Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Total Homes Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total PP Delivery
DC/17/02232/FUL	FUL permission	Thurston	Land On The West Side Of Barton Road Thurston Suffolk	05/07/2018	129	45	121	120	42	1	53	53	15	0	0	0	121
M /4942/16/FUL	FUL permission	Thurston	Land at Meadow Lane Thurston IP31 3QG	08/01/2019	64	22	64	63	22	1	0	25	25	14	0	0	64
DC/18/03547/RES	RES permission	Thurston	Land To The West Of Ixworth Road Thurston Suffolk	18/06/2019	248	87	132	132	46	0	53	53	26	0	0	0	132
DC/18/01376/RES	RES permission	Thurston	Land to the south of Norton Road Thurston	12/10/2018	175	61	141	109	38	32	53	53	35	0	0	0	141
DC/19/01602/RES	RES permission	Thurston	Land On The North Side Of Norton Road Thurston Suffolk	16/10/2019	85	35	77	76	31	1	25	25	25	2	0	0	77
DC/19/05377/FUL	FUL permission	Thurston	Plots 1 And 2 Cedars Close Thurston Suffolk	10/02/2020	2	~	1	0	0	1	1	0	0	0	0	0	1
DC/20/00573/FUL	FUL permission	Thurston	Land Adjacent To Highmead House Ixworth Road Thurston Bury St Edmunds Suffolk IP21 2QF	31/03/2020	1	~	1	0	0	1	1	0	0	0	0	0	1
DC/20/05105/RES	RES permission	Thurston	Land South Of GTD Barrells Road Thurston Suffolk	07/01/2020	1	~	1	0	0	1	1	0	0	0	0	0	1
DC/20/01981/RES	RES permission	Thurston	Land South Of Barrells Road Thurston Suffolk	03/08/2020	1	~	1	0	0	1	1	0	0	0	0	0	1
DC/20/04532/RES	RES permission	Thurston	Land South Of Barrells Road Thurston Suffolk	08/12/2020	1	~	1	0	0	1	1	0	0	0	0	0	1
DC/21/03647/RES	RES permission	Thurston	Land South of Barrells Road Thurston Suffolk	29/10/2021	1	~	1	0	0	1	1	0	0	0	0	0	1

Category A: Not Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/19/05386/FUL	FUL permission	Thurston	Plot 8 Land Off Cedars Close Thurston Suffolk	27/03/2020	1	~	1	1	0	0	0	1	0	0	0	0	1
DC/21/04640/FUL	FUL permission	Thurston	Barn At Former Mill Farm Barton Road Thurston IP31 3QA	07/10/2021	1	~	1	1	0	0	0	1	0	0	0	0	1

Category B: Deliverable

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/19/03486/OUT	OUT permission	Thurston	Land South West Of Beyton Road Thurston Suffolk	23/12/2020	210	73	210	210	73	0	0	47	53	53	53	4	210

M /5070/16/OUT	OUT permission	Thurston	Land on the North side of Norton Road RESIDUAL SITE FIGURE	29/03/2018	113	39	113	113	39	0	0	0	0	23	25	65	113
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Category B: Not Deliverable

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/17/02782/OUT	OUT permission	Thurston	Land Off Church Road Access Via Garden Of 'The Firs' Thurston	24/12/2020	15	5	15	15	5	0	0	0	0	0	0	15	15

	Total Outstanding Dwellings
Market & Affordable Outstanding	881
Of which, Assumed Affordable Homes Not Started	296
Number of Existing Dwellings (estimate - Census 2021)	1,494
Outstanding dwellings as a % of estimated existing dwellings	59.0%

Stowmarket

Category A: Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Total Homes Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total PP Delivery
DC/20/04723/FUL	FUL permission	Stowmarket	Site 3C And 3D Land South Of Gun Cotton Way Stowmarket Suffolk	04/08/2021	141	49	141	140	49	1	26	53	53	9	0	0	141
DC/19/02484/FUL	FUL permission	Stowmarket	Stowmarket Middle School Walnut Tree Walk Stowmarket IP14 1JP	26/08/2020	38	38	38	37	37	1	0	28	10	0	0	0	38
M /2028/15/FUL	FUL permission	Stowmarket	Land off Creeting Road West	04/03/2016	14	0	14	0	0	14	14	0	0	0	0	0	14
M /3756/12/FUL	FUL permission	Stowmarket	19-21 Violet Hill Road Stowmarket	14/01/2014	13	0	13	0	0	13	13	0	0	0	0	0	13
DC/18/03111/RES	RES permission	Stowmarket	Land North Of Chilton Leys Chilton Leys Stowmarket PHASE 2A	02/11/2018	175	35	62	62	35	0	53	9	0	0	0	0	62
DC/19/05213/FUL	FUL permission	Stowmarket	Stowmarket Community Education Centre Childer Road Stowmarket Suffolk IP14 1BP	27/05/2020	4	4	4	3	3	1	4	0	0	0	0	0	4
DC/20/04534/FUL	FUL permission	Stowmarket	6 Danescourt Avenue Stowmarket Suffolk IP14 1OD	02/12/2020	3	0	3	0	0	3	3	0	0	0	0	0	3
DC/19/01954/FUL	FUL permission	Stowmarket	12 Chandlers Walk Stowmarket Suffolk IP14 2DT	17/06/2019	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/21/01026/FUL	FUL permission	Stowmarket	7A Station Road West Stowmarket Suffolk IP14 1EF	15/04/2021	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/20/01832/AGDW	Prior approval (Agri)	Stowmarket	Ashes Farm Newton Road Stowmarket Suffolk IP14 5AD	07/07/2020	2	0	2	0	0	2	2	0	0	0	0	0	2

Category A: Not Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/19/01482/FUL	FUL permission	Stowmarket	Land to the East and West of Prenice Road, Stowmarket	25/09/2020	93	0	93	93	0	0	0	25	25	25	18	0	93
DC/20/05912/RES	RES permission	Stowmarket	Northfield View Phase 2B Fuller Way Stowmarket Suffolk	31/03/2021	100	20	100	100	20	0	0	44	53	3	0	0	100
DC/21/03333/LCE	Prior Approval (Lawful)	Stowmarket	Land Off Creeting Road West Stowmarket Suffolk	18/08/2021	14	0	14	14	0	0	11	3	0	0	0	0	14
DC/19/03130/FUL	FUL permission	Stowmarket	9-11 Bond Street Stowmarket Suffolk IP14 1HR	27/09/2019	4	0	3	3	0	0	0	3	0	0	0	0	3
DC/19/04978/FUL	FUL permission	Stowmarket	land adjacent. 116 bridge street, stowmarket. IP14 1BS	26/11/2019	2	0	2	2	0	0	0	2	0	0	0	0	2
DC/20/01055/FUL	FUL permission	Stowmarket	43A Beech Terrace Stowmarket Suffolk IP14 1JB	30/04/2020	2	0	2	2	0	0	0	2	0	0	0	0	2

DC/20/01022/FUL	FUL permission	Stowmarket	5 Chestnut Grove Stowmarket Suffolk IP14 1AG	12/05/2020	1	0	1	1	0	0	0	1	0	0	0	0	0	1
DC/20/00940/FUL	FUL permission	Stowmarket	11 Tavern Street Stowmarket Suffolk IP14 1PJ	29/07/2020	1	0	1	1	0	0	0	1	0	0	0	0	0	1
DC/21/00932/FUL	FUL permission	Stowmarket	96 Poplar Hill Stowmarket Suffolk IP14 2AX	14/04/2021	1	0	1	1	0	0	0	1	0	0	0	0	0	1
DC/21/01201/FUL	FUL permission	Stowmarket	4 Creeping Road West Stowmarket Suffolk IP14 5AU	30/04/2021	1	0	1	1	0	0	0	1	0	0	0	0	0	1
DC/21/02260/FUL	FUL permission	Stowmarket	Land At Edinburgh Close Stowmarket Suffolk IP14 5AR	15/06/2021	1	0	1	1	0	0	0	1	0	0	0	0	0	1
DC/20/03965/OUT	OUT permission	Stowmarket	The Uplands Stowupland Road Stowmarket Suffolk IP14 5AN	05/11/2020	5	0	5	5	0	0	0	0	5	0	0	0	0	5
DC/19/01291/OUT	OUT permission	Stowmarket	8 Newton Road Stowmarket Suffolk IP14 5AF	08/05/2019	1	0	1	1	0	0	0	0	1	0	0	0	0	1
DC/20/00948/OUT	OUT permission	Stowmarket	24 Gainsborough Road Stowmarket Suffolk IP14 11H	28/04/2020	1	0	1	1	0	0	0	0	1	0	0	0	0	1
DC/21/06819/OUT	OUT permission	Stowmarket	20 Danescourt Avenue Stowmarket Suffolk IP14 1OD	10/02/2022	1	0	1	1	0	0	0	0	1	0	0	0	0	1

Category B: Deliverable

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
M/5007/16/OUT	OUT permission	Stowmarket	Land North Of Chilton Leys Chilton Leys Stowmarket RESIDUAL SITE FIGURE	05/07/2018	325	65	325	325	65	0	0	0	0	50	53	222	325

Category B: Not Deliverable (None)

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
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	Total Outstanding Dwellings	
Market & Affordable Outstanding		831
Of which, Assumed Affordable Homes Not Started		209
Number of Existing Dwellings (estimate - Census 2021)		11451

Outstanding dwellings as a % of estimated existing dwellings	7.3%
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Woolpit

Category A: Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Total Homes Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total PP Delivery
M/2112/16/FUL	FUL permission	Woolpit	Land on the East Side of Green Road, Woolpit	28/09/2018	49	17	21	0	17	28	21	0	0	0	0	0	21
DC/21/02564/RES	RES permission	Woolpit	Land South Of Old Stowmarket Road Woolpit IP30 9QU	10/06/2021	120	42	98	98	42	22	53	45	0	0	0	0	98
DC/19/05196/RES	RES permission	Woolpit	Land South Of Old Stowmarket Road Woolpit Suffolk	10/06/2021	115	40	97	93	40	18	53	44	0	0	0	0	97
DC/20/04290/RES	RES permission	Woolpit	Land On The South Side Of Rags Lane Woolpit	15/12/2020	5	0	5	0	0	0	5	0	0	0	0	0	5

Category A: Not Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/21/01132/RES	RES permission	Woolpit	Land Off Bury Road The Street Woolpit IP30 9SA	21/01/2022	300	60	300	300	60	0	0	53	53	53	53	88	300
DC/20/03775/FUL	FUL permission	Woolpit	Swan Inn The Street Woolpit Bury St Edmunds Suffolk IP30 9DN	05/11/2020	1	0	1	1	0	0	0	1	0	0	0	0	1
DC/21/03985/OUT	OUT permission	Woolpit	Land South Of Old Stowmarket Road Woolpit Suffolk	09/09/2021	5	0	5	5	0	0	0	0	5	0	0	0	5

Category B: Deliverable (None)

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
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Category B: Not Deliverable

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/19/02656/OUT	OUT permission	Woolpit	Land South of Old Stowmarket Road, Woolpit	n/a	40	14	40	40	14	0	0	0	0	0	0	40	40

	Total Outstanding Dwellings
Market & Affordable Outstanding	567
Of which, Assumed Affordable Homes Not Started	173

Number of Existing Dwellings (estimate - Census 2021)	973
Outstanding dwellings as a % of estimated existing dwellings	58%

Elmswell

Category A: Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Total Homes Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total PP Delivery
DC/18/01679/RES	RES permission	Elmswell	Land adjacent to Wetherden Road Elmswell IP10 9DG	25/10/2018	240	84	53	50	50	3	53	0	0	0	0	0	53
M/3918/15/RES	RES permission	Elmswell	Former Grampian/Harris Factory St. Edmund Drive	02/06/2016	184	64	47	35	35	12	47	0	0	0	0	0	47
DC/19/02495/RES	RES permission	Elmswell	Land To The East Of Ashfield Road Elmswell IP30 9HG	09/07/2020	106	37	106	0	0	106	0	53	53	0	0	0	106
DC/18/04267/RES	RES permission	Elmswell	Land To The East Of Borley Crescent Elmswell Suffolk	26/06/2019	60	21	57	0	0	57	25	25	7	0	0	0	57
DC/18/00367/FUL	FUL permission	Elmswell	St Johns House Church Road Elmswell Bury St Edmunds Suffolk IP30 9DY	25/04/2018	3	0	1	0	0	1	1	0	0	0	0	0	1
DC/19/00996/FUL	FUL permission	Elmswell	Annexe Kiln Farm Cottage Kiln Lane Elmswell Suffolk	17/06/2019	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/21/04470/FUL	FUL permission	Elmswell	Silver Birches Church Road Elmswell Suffolk IP30 9DU	05/10/2021	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/21/05727/RES	RES permission	Elmswell	Land South Of Field View Ashfield Road Elmswell Bury St Edmunds Suffolk IP30 9HU	13/12/2021	6	0	6	5	0	1	6	0	0	0	0	0	6

Category A: Not Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/20/05053/OUT	OUT permission	Elmswell	Land To The East Of Oak Lane Elmswell Bury St Edmunds Suffolk IP30 9HH	29/01/2021	9	0	9	9	0	0	0	0	9	0	0	0	9
DC/20/04375/OUT	OUT permission	Elmswell	White House Barns Ashfield Road Elmswell Suffolk	06/01/2021	6	0	6	6	0	0	0	0	6	0	0	0	6
DC/19/04317/OUT	OUT permission	Elmswell	holly lodge, cross street. Elmswell, IP30 9DR	08/11/2019	3	0	3	3	0	0	0	0	3	0	0	0	3
DC/21/06401/OUT	OUT permission	Elmswell	Beech Glade 106 Bennett Avenue Elmswell Suffolk IP30 9EY	20/01/2022	1	0	1	1	0	0	0	0	1	0	0	0	1
DC/21/02551/AGDW	Prior approval (Agri)	Elmswell	Willow Farm Ashfield Road Elmswell Suffolk IP30 9HG	24/06/2021	4	0	4	4	0	0	0	4	0	0	0	0	4

Category B: Deliverable

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/18/02146/OUT	OUT permission	Elmswell	Land To The North And West Of School Road Elmswell Suffolk	08/03/2022	86	30	86	86	30	0	0	0	16	25	24	21	86

Category B: Not Deliverable

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/20/01677/OUT	OUT permission	Elmswell	Land To The West Of The Former Bacon Factory Elmswell	21/01/2021	65	22	65	65	22	0	0	0	0	0	0	65	65

	Total Outstanding Dwellings
Market & Affordable Outstanding	446
Of which, Assumed Affordable Homes Not Started	137
Number of Existing Dwellings (estimate - Census 2021)	1,868
Outstanding dwellings as a % of estimated existing dwellings	24%

Needham Market

Category A: Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Total Homes Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total PP Delivery
M /3153/14/FUL	FUL permission	Needham Market	Needham Chalks Ltd, Ipswich Rd	14/12/2015	264	27	127	121	27	6	53	53	21	0	0	0	127
DC/18/05104/FUL	FUL permission	Needham Market	Former MSDC Offices & Associated Land 1 31 High Street Needham Market IP6 8DL	10/10/2019	94	10	80	61	10	19	25	25	25	5	0	0	80
DC/18/04811/FUL	FUL permission	Needham Market	Site At Needham Market Middle School School Street Needham Market Ipswich IP6 8BP	10/12/2019	41	41	40	2	2	38	28	12	0	0	0	0	40
DC/19/02363/RES	RES permission	Needham Market	Land Hill House Lane Needham Market Suffolk	08/11/2019	37	13	37	0	0	37	0	28	9	0	0	0	37
DC/21/01520/FUL	FUL permission	Needham Market	Land North East Of Gipping View Hill House Lane Needham Market Ipswich Suffolk IP6 8EA	16/07/2021	4	0	4	0	0	4	4	0	0	0	0	0	4
DC/21/01252/FUL	FUL permission	Needham Market	Agricultural Building And Land Hill House Lane Needham Market Suffolk	27/05/2021	2	0	2	1	0	1	2	0	0	0	0	0	2
DC/18/03419/FUL	FUL permission	Needham Market	The Willow Hall The Causeway Needham Market Ipswich IP6 8BD	21/09/2018	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/20/01181/FUL	FUL permission	Needham Market	30 High Street Needham Market Ipswich Suffolk IP6 8AP	05/06/2020	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/21/05590/FUL	FUL permission	Needham Market	Plot 2 Hill House Lane Needham Market Suffolk	13/12/2021	1	0	1	0	0	1	1	0	0	0	0	0	1
DC/18/03965/RES	RES permission	Needham Market	Land Adjacent To 96 Stowmarket Road Needham Market Suffolk	07/12/2018	9	0	9	0	0	9	9	0	0	0	0	0	9

Category A: Not Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/21/02927/RES	RES permission	Needham Market	Land North West Of Hill House Lane Needham Market Suffolk IP6 8EA	13/01/2022	64	22	64	64	22	0	0	25	25	14	0	0	64
DC/20/05631/FUL	FUL permission	Needham Market	Land Rear Of 68-70 High Street Needham Market Ipswich Suffolk IP6 8AW	01/02/2021	2	0	2	2	0	0	0	2	0	0	0	0	2
DC/21/01592/FUL	FUL permission	Needham Market	2 High Street Needham Market Ipswich Suffolk IP6 8AP	11/05/2021	1	0	1	1	0	0	0	1	0	0	0	0	1

DC/21/02030/FUL	FUL permission	Needham Market	Storage Building The Pightle Needham Market Suffolk	28/05/2021	1	0	1	1	0	0	0	1	0	0	0	0	1
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Category B: Deliverable (None)

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
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Category B: Not Deliverable (None)

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
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	Total Outstanding Dwellings
Market & Affordable Outstanding	370
Of which, Assumed Affordable Homes Not Started	61
Number of Existing Dwellings (estimate - Census 2021)	1,639
Outstanding dwellings as a % of estimated existing dwellings	23%

Great Blakenham

Category A: Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Total Homes Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total PP Delivery
DC/18/01487/RES	RES permission	Great Blakenham	Land On The West Side Of Stowmarket Road Great Blakenham Suffolk	27/06/2018	130	46	110	108	46	2	53	53	4	0	0	0	110
DC/21/03549/FUL	FUL permission	Great Blakenham	241and 243 Stowmarket Road Great Blakenham Suffolk IP6 0LY	19/08/2021	1	0	1	0	0	1	1	0	0	0	0	0	1

Category A: Not Commenced

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
DC/19/04888/FUL	FUL permission	Great Blakenham	241 Stowmarket Road Great Blakenham Ipswich Suffolk IP6 0LY	09/01/2020	2	0	1	1	0	0	0	1	0	0	0	0	1
DC/20/01927/OUT	OUT permission	Great Blakenham	Land South Of Chalk Hill Lane Great Blakenham Suffolk	21/12/2020	8	0	8	8	0	0	0	0	8	0	0	0	8
DC/20/05205/OUT	OUT permission	Great Blakenham	3 Chalk Hill Lane Great Blakenham Ipswich	14/01/2021	3	0	2	2	0	0	0	0	2	0	0	0	2
DC/21/03137/OFDW	Prior approval (Office)	Great Blakenham	51 Gipping Road Great Blakenham Suffolk IP6 0LB	09/07/2021	1	0	1	1	0	0	0	1	0	0	0	0	1

Category B: Deliverable (None)

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
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Category B: Not Deliverable (None)

PP Reference	Development Status	Parish	Site Address	Date of Approval	Dwellings Approved	Affordable Homes	Net Outstanding Dwellings (1st April 2022)	Not Started	Assumed Affordable Homes Not Started	Commenced	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2036/37	Total
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	Total Outstanding Dwellings	
Market & Affordable Outstanding		123
Of which, Assumed Affordable Homes Not Started		46
Number of Existing Dwellings (estimate - Census 2021)		1,095

Outstanding dwellings as a % of estimated existing dwellings	11%
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