



STRATEGIC PLANNING COMMITTEE

Monday, 05 December 2022

Subject	Authority Monitoring Report 2021/22
Report of	Councillor David Ritchie Cabinet Member with responsibility for Planning and Coastal Management
Supporting Officers	Adam Nicholls Principal Planner (Policy & Delivery) adam.nicholls@eastsoffolk.gov.uk 07881 005429 Andrea McMillan Planning Manager (Policy, Delivery and Specialist Services) andrea.mcmillan@eastsoffolk.gov.uk 07766 071710

Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is NOT in the public interest to disclose the exempt information.	Not applicable
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

1. The Authority Monitoring Report (AMR) is produced annually to provide information on the progress of producing and implementing the Council's Local Plans.
2. The Council monitors planning applications throughout the year to provide a basis on which to judge the implementation and effectiveness of policies contained within Local Plans and Neighbourhood Plans. Monitoring data collected by the Council is used alongside information collected from other sources such as Suffolk Observatory, Office of National Statistics and Natural England.
3. The 2021/22 AMR covers the monitoring period 1st April 2021 to 31st March 2022.

Options:

The Council is required to prepare and publish its AMR in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), so there are no other credible options.

Recommendation/s:

1. That the East Suffolk Authority Monitoring Report covering the period 1st April 2021 to 31st March 2022 be published.
2. That the Head of Planning and Coastal Management Service, in consultation with the Cabinet Member for Planning and Coastal Management, be given delegated authority to make any necessary minor typographical or presentational changes to the document prior to formally publishing it.

Corporate Impact Assessment

Governance:

The Local Plan Working Group oversees the preparation of the Authority Monitoring Report.

ESC policies and strategies that directly apply to the proposal:

The two adopted Local Plans for East Suffolk (Waveney Local Plan and Suffolk Coastal Local Plan).

Environmental:

No direct impact, although many environmental indicators are reported in the AMR.

Equalities and Diversity:

This report is for information only, so no Equality Impact Assessment is required. However, some of the information and analysis relates to equalities and diversity (such as affordable housing completions and various health and economic indicators).

Financial:

The AMR has been prepared by the Planning Policy and Delivery Team, who continually monitor the progress of the Local Plan policies and planning applications that are received and determined by the Council. The financial costs of this are already accounted for within existing staff budgets for the Planning and Coastal Management Service Area.

Human Resources:

No impact.

ICT:

No impact.

Legal:

The AMR has been prepared in accordance with Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and will be published on the Council's website.

Risk:

None directly, but the AMR highlights where there are potential environmental, social and/or economic risks which may need mitigating/addressing.

External Consultees:	None
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>

P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<p>How does this proposal support the priorities selected?</p> <p>The Authority Monitoring Report collates and analyses a wide range of environmental, social and economic data and information of relevance to East Suffolk, especially in relation to the implementation of the policies of the two Local Plans.</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	The Council produces the Authority Monitoring Report (AMR) each year to show progress on producing and implementing the Local Plans. This report covers East Suffolk as a whole and provides specific information relating to the Suffolk Coastal Local Plan, Waveney Local Plan and Neighbourhood Plans.
1.2	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires key pieces of information to be covered by an Authority Monitoring Report, such as:</p> <ul style="list-style-type: none"> • Progress on the Local Plan against the timetable in the Local Development Scheme; • Details of any Neighbourhood Plans or Neighbourhood Development Orders that have been ‘made’ (adopted); • Any action taken under the Duty to Co-operate; • Details of any policies not being implemented; • Net amount of additional affordable housing; and • Total housing (and affordable housing) completed against annual requirements.
1.3	This AMR covers the monitoring period 1 st April 2021 to 31 st March 2022 and provides monitoring information against indicators in the Local Plans, such as housing completions, town centre uses, tourism applications, environmental designations and the planning applications that the Council received.
1.4	The Suffolk Coastal Local Plan was adopted in September 2020. This is therefore the first AMR covering a full year of monitoring information (the 2020/21 AMR covered only the first six months of the life of the Local Plan).
1.5	The Local Plan covering the former Waveney area was adopted in March 2019. This is therefore the third monitoring report covering the adopted Waveney Local Plan.

1.6	The previous individual local authorities have a long and established history of producing AMRs. Suffolk Coastal District Council and Waveney District Council both first published an AMR in December 2005 to cover the monitoring period 2004/05, and they have been produced every year since (as a single East Suffolk AMR since 2018/19).
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2 Current position	
2.1	In accordance with the regulations and examples of best practice, the AMR for East Suffolk (see Appendix A) includes sections which focus on specific aspects of the Local Plan process.
2.2	Chapter 1 introduces the document, with Chapter 2 outlining the content and structure of the report.
2.3	Chapter 3 provides information in relation to the progress of the Local Plan documents against the milestones outlined in the Local Development Schemes. As both Local Plans are adopted and no Local Plan preparation work took place during 2021/22, there were no milestones for this monitoring period.
2.4	As set out in Chapter 4, many Neighbourhood Plans progressed their production during 2021/22, with five 'made' (adopted) – Bredfield, Kesgrave, Reydon, Beccles and Southwold.
2.5	<p>Chapter 5 relates to the Community Infrastructure Levy (CIL). The Council is required to produce an annual Infrastructure Funding Statement (IFS), which details developer contribution income, allocations and spending as well as the Infrastructure List; the list of projects that developer contributions may fund to support the local plan growth. The <u>2021/22 IFS</u> was approved by Cabinet in September 2022 and contains financial reports relating to CIL and Section 106 contributions, which no longer need to be reported in the AMR. However, the headline figures (which are included in the AMR) for 2021/22 show (unsurprisingly) some changes to the 2020/21 figures:</p> <ul style="list-style-type: none"> • CIL received in the monitoring period was £6.2m (a small decline) • CIL Demand Notices (for development commenced in the period) totalling £11.9m (over £2m more) • CIL Liability Notices (issued on the grant of CIL chargeable development) totalling £14m (about £1.6m less) • Total developer contributions (£106 contributions and RAMS habitat mitigation) received by East Suffolk Council was £870,000, a significant (but not worrying) drop from the previous year. Other contributions, for highways works or Education (for example) were made to direct to Suffolk County Council). Any contributions directly received by other bodies will be reported in their own Infrastructure Funding Statement • The Council has been finalising a single CIL Charging Schedule for the whole of East Suffolk (to replace the current Suffolk Coastal and Waveney Charging Schedules). The Examination Hearing took place in October 2022, and it is hoped that the Examiner's report will be submitted to the Council before the end of 2022.
2.6	Under the Localism Act 2011, Local Planning Authorities are required to engage constructively, actively and on an on-going basis in relation to strategic cross-boundary planning matters. East Suffolk Council regularly engages with neighbouring authorities and other prescribed bodies to ensure co-operation on various matters throughout the production and implementation of Local Plan documents. This is reported in Chapter 6.

Chapter 7 details how the Suffolk Coastal and Waveney Local Plans have been implemented, performed and delivered over the monitoring period. The chapter is split into sub sections that are outlined below:

- Planning appeals – a significant decline in appeals (a total of 64 compared to 99 in 2020/21) but the dismissal rate remains high (about 70%), which shows that the Council is generally making correct decisions. Very few “costs awards” were made by inspectors because of “unreasonable” behaviour by the Council in defending appeals.
- Employment – overall there has been a relatively small increase in employment floorspace across East Suffolk. In Suffolk Coastal there was an increase of about 68,000m² (largely for a new distribution centre in Trimley St Martin, to serve the Port of Felixstowe). In Waveney, about 5,000m² of employment floorspace was completed, but about 7,700m² was lost (some sheds on the former Jeld Wen site in Lowestoft were demolished (7,300m²), to enable the construction of Colin Law Way, the access road to Riverside Business Park), leading to a net loss of about 3,000m².
- Retail – the number of vacant units in the town centres changed relatively little overall, with some rising slightly and some falling slightly. Lowestoft continues to have the highest proportion of vacancies, increasing from 21.5% to 24% and there were smaller increases in Halesworth, Felixstowe and Framlingham (with vacancy rates of 8-10%). Small (but welcome) declines were seen in Beccles, Bungay and Woodbridge, with Aldeburgh having the lowest vacancy rate of 5.8%.
- Housing – 822 new homes were completed during the monitoring period (499 in Suffolk Coastal and 323 in Waveney); in terms of affordable homes, a total of 225 were completed (114 in Suffolk Coastal and 111 in Waveney). The Housing Delivery Test for the period 2017/18-2020/21, published in January 2022, showed 107% delivery in East Suffolk as a whole. The Housing Affordability ratio has increased to 9.74 (from 8.39). An update to the Housing Action Plan was published in August 2021, and has been reviewed again this year.
- Transport – applications received generally in conformity with the Suffolk County Council guidance on parking standards. Local Plan policies seek to further increase use of sustainable modes of transport.
- Climate Change – No planning applications have been approved in the monitoring period against Environment Agency advice on flood risk. In addition, the Council:
 - prepared the Sustainable Construction Supplementary Planning Document (SPD) (adopted in April 2022), which provides clear guidance for how developers can comply with the two Local Plan policies on methods of sustainable construction
 - completed the formal consultation on the East Suffolk Cycling & Walking Strategy in early 2022, and adopted the Strategy in October 2022
 - has continued work (with Great Yarmouth Borough Council, North Norfolk District Council and the Broads Authority) on the preparation of a single Coastal Adaptation SPD, with the formal draft consultation planned for January 2023.
- Natural Environment – no instances of nitrogen dioxide above the national objective level of 40µg/m³ and air quality actually improved. One of the two Air Quality Management Areas remain (at Woodbridge) has been

	<p>under the limit for some years and the process of de-designating it has continued. The other AQMA, at Stratford St Andrew, has seen improvements too and it is hoped that it will continue to stay below the 40µg/m³ limit, which could lead to the de-designation process eventually too.</p> <ul style="list-style-type: none"> • Historic Environment – key points are: <ul style="list-style-type: none"> ○ Work on the South Lowestoft Heritage Action Zone (HAZ) continued, with a Conservation Area Appraisal and Management Plan completed in January 2022, and a masterplan for South Lowestoft and the Seafront prepared in February 2022 ○ North Lowestoft Conservation Area continues to be considered “at risk” by Historic England, due to some unsympathetic works to various buildings but a feasibility study for the North Lowestoft HAZ, Scores and Triangle Market area was prepared in October 2021 as part of measures to improve the area. The trend is now “improving”, a positive trend from the “deteriorating significantly” position of previous years ○ Three replacement Conservation Area appraisals were approved (North and South Lowestoft and Bungay) • Health – communities in the former Suffolk Coastal area generally have better health and life expectancy than communities in the former Waveney area (especially some parts of inner Lowestoft). Rates of physical activity are below the national average and obesity rates for both adults and children (Yr 6, age 10/11) remain high. • Site Allocations – this section provides a summary of site allocations in the two Local Plans and ‘made’ Neighbourhood Plans which have been granted planning permission during the monitoring year (2021/22).
2.8	Chapter 8 relates to the Sustainability Appraisals that support the Local Plan documents. Tables provide a summary of potential significant effects (positive and negative) identified in the Council’s Sustainability Appraisals. Monitoring of these enables the potential significant effects to be assessed and any remedial action to be taken if required.
2.9	The document also includes four appendices to provide further detail, justification and information in respect of the details included in the AMR.
2.10	The AMR for the monitoring period 2021/22 shows that the policies in the Local Plans and Neighbourhood Plans across the district are generally performing as expected. The policies are all evidence based and examples of best practice. They provide consistency of decision making for those wishing to bring forward applications and certainty for the local communities in respect of the future development and infrastructure requirements across the District.

3 Relationship to Housing Land Supply

3.1	The AMR largely reports on progress on the implementation of the Local Plans over the past monitoring year. The Council also has a duty to annually update its housing land supply position, to set out its supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against the housing requirement.
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3.2	As both of the Council's Local Plans are less than five years old, the supply is measured against the housing requirements in the Local Plans (where plans are over five years old, the assessment is made against housing need calculated using the Government's standard methodology). Account is also taken of any shortfall in delivery over the plan period and an appropriate buffer is then added on top, as required by the National Planning Policy Framework (for East Suffolk this is 5% for the figures as at March 2022).
3.3	The five-year supply is made up of many sites of a range of sizes, including most sites with full planning permission, some sites with outline permission and some allocations in Local Plans and Neighbourhood Plans. To be included, sites must meet the definition of 'deliverable' as set out in the NPPF. For some categories of site, including allocations without permission and larger sites with outline permission, to be included clear evidence must be provided to demonstrate that housing completions will begin on site within five years. An appropriate allowance is also made for windfall development – these are developments that are not yet known however reflects that the Local Plans contain policies to support appropriate development coming forward that is not allocated (for example development within Settlement Boundaries and affordable housing on 'exception' sites).
3.4	The housing land supply positions as at 31 st March 2022 were published in November 2022, and are very little changed from the previous year (see Background Reference below for a link). For both Local Plan areas, there is a 5-year supply: <ul style="list-style-type: none"> • Suffolk Coastal Local Plan area: 6.47 years (previously 6.52 years) • Waveney Local Plan area: 5.78 years (previously 5.74 years)
3.5	Whilst the numbers are similar, the updated assessment includes sites granted permission over the course of 2021/22, whilst some sites included last year now feature in the housing completion figures. A large number of dwellings sit outside the five-year supply period, where there is insufficient evidence that completions will take place during the next five years. This includes many dwellings on allocated sites as well as dwellings with outline consent (especially the largest sites, which can have long lead-in times). However, as time goes on progress will be made and these sites should feature in the five-year supply in the future, just as sites currently being developed will in turn drop out of the supply and be recorded as completions in future AMRs.
3.6	The Council also has a Housing Action Plan which it updates each year and which has been reviewed again in 2022 (to be published shortly). The Housing Action Plan contains actions to support the delivery of housing. These actions will, by supporting appropriate housing development coming forward, contribute towards the maintenance of a five-year supply.
3.7	The Housing Action Plan highlights that some of the factors affecting housing delivery are national, such as increased costs of construction materials, but also sets out a series of actions for the planning service and wider Council to support the delivery of housing. To date Housing Action Plans have included actions such as engaging with landowners and developers to understand any issues affecting development, updating the Local Validation List and recruiting to vacant posts.

4 Reason/s for recommendation

4.1	In order to publish the AMR for the monitoring period 2021/22, the Council's Constitution outlines that Strategic Planning Committee is required to review and monitor the operational impact of the Council's planning policies and development management activities.
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Appendices

Appendices:

Appendix A	East Suffolk Authority Monitoring Report 2021/22
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Background reference papers:

Date	Type	Available From
November 2022	Statement of Housing Land Supply as at 31 st March 2022, and Appendices	www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/
Various	Housing Action Plan	www.eastsuffolk.gov.uk/planning/housing-action-plan/