East Suffolk Authority Monitoring Report 2022/23

Covering the Suffolk Coastal Local Plan area and the Waveney Local Plan area

An update on progress of the Local Plans, delivery of policies and proposals and other monitoring information for East Suffolk

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Whilst every effort is made to ensure the accuracy of data in this report, it cannot be guaranteed free of errors.

1 Introduction

1.1 East Suffolk is covered by two adopted Local Plans.

Local Plan Document	Adopted date	Geographical coverage
Waveney Local Plan	20 th March 2019	Former district of Waveney (excluding
		the Broads Authority area)
Suffolk Coastal Local Plan	23 rd September 2020	Former district of Suffolk Coastal

- 1.2 Authority Monitoring Reports (AMRs) provide an assessment on the progress of the preparation of Local Plans and monitor the effectiveness of polices including the delivery of site specific allocations.
- 1.3 The Broads Authority produces its own monitoring report, which includes the parts of East Suffolk which lie within the Broads Authority area.
- 1.4 Authority Monitoring Reports must include:
 - 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 adopted;
 - any Community Infrastructure Levy receipts;
 - action taken under the Duty to Co-operate;
 - details of any policies not being implemented;
 - net additional dwellings (and affordable housing) completed in monitoring year; and
 - total housing (and affordable housing) completed against annual requirements.
- 1.5 This Authority Monitoring Report covers the period 1st April 2022 to 31st March 2023. The report is split into two parts. This document reports the detail set out in the regulations as summarised above.
- 1.6 The Planning Delivery dashboard presents information and data for the monitoring year for housing, employment, retail and town centres, climate change, design, and the natural and historic environments and provides an assessment on how the local plan polices are performing. The dashboard also includes time series data and interactive maps e.g. housing completions, retail and town centre surveys and progress on delivery of site allocations.
- 1.7 Much of the data used to support the AMR is available to view and download as spreadsheets or shapefiles from the Council's Open Data portal at https://data-eastsuffolk.opendata.arcgis.com.

1.8 Planning information can be found on East Suffolk Council's webpages:

Planning Policy and Local Plans <u>www.eastsuffolk.gov.uk/localplan</u>

Open Data Portal https://data-eastsuffolk.opendata.arcgis.com

Planning Policy Consultations www.eastsuffolk.gov.uk/planning-policy-consultations

Neighbourhood Planning www.eastsuffolk.gov.uk/neighbourhood-planning

Self Build and Custom Build Register www.eastsuffolk.gov.uk/self-build-and-custom-build-register

Brownfield Land Register www.eastsuffolk.gov.uk/brownfield-land-register

Community Infrastructure Levy www.eastsuffolk.gov.uk/CIL

Planning Applications https://www.eastsuffolk.gov.uk/planning-applications-and-enforcement



2 Progress of Local Plan against Local Development Scheme

2.1 The Suffolk Coastal Local Plan and the Waveney Local Plan were adopted in September 2020 and March 2019 respectively and no Local Plan preparation work took place during 2022/23. Therefore, there are no milestones for this monitoring period. For reference purposes the Local Development Schemes for each Local Plan can be found at https://www.eastsuffolk.gov.uk/statement-of-community-involvement-and-local-development-scheme/.

- 3.1 Neighbourhood Plans are optional plans prepared by local communities which set out detailed planning policies and proposals for their specific area e.g. a parish. Once 'made' (adopted), they form part of the Development Plan against which planning applications must be determined.
- 3.2 A Neighbourhood Plan allows communities to create a vision and planning policies for the use and development of land for their area, for example, where new homes should be built and what they should look like.
- 3.3 Neighbourhood Development Plans must be in general conformity with the strategic policies in the relevant adopted Local Plan.
- 3.4 With a Neighbourhood Development Order, communities can grant planning permission for development they want to see go ahead in a neighbourhood, for example allowing home extensions to be built without the need to apply for planning permission. No Neighbourhood Development Orders are currently in place in East Suffolk.
- 3.5 During 2022/23 five Neighbourhood Plans have been made:
 - Bungay;
 - Halesworth;
 - Lound, Ashby, Herringfleet & Somerleyton;
 - Oulton; and
 - Worlingham.
- 3.6 As of 31 March 2023, there are nineteen made Neighbourhood Plans in East Suffolk.
- 3.7 The most up-to-date information on Neighbourhood Planning including guidance notes can be found at www.eastsuffolk.gov.uk/neighbourhoodplanning.

4 Developer Contributions – Community Infrastructure Levy and S106 Agreements (Planning Obligations)

- 4.1 The Community Infrastructure Levy legislation requires the production of annual Infrastructure Funding Statements (IFS). The annual IFS must set out which projects are to be funded by CIL in the future, as well as how much CIL has been collected, what it has been spent on and how much has been passed to parish councils. Similar information is also required to be published in relation to Section 106 legal agreements (planning obligations).
- 4.2 The East Suffolk Infrastructure Funding Statement 2022-23 can be found at https://www.eastsuffolk.gov.uk/infrastructure-funding-statement/. As a result, the contents are not duplicated in this AMR, other than the summary figures below for 2022/23. Also see the Council's CIL Reporting webpage for more details https://www.eastsuffolk.gov.uk/cil-reporting/:

CIL received	£6,792,342.81
Total developer contributions (S106 legal agreements & RAMS habitat	£396,127.29
mitigation) received (including affordable housing commuted sums)	

4.3 The East Suffolk CIL Charging Schedule was approved by Council on 28 June 2023 and came into effect on 1 August 2023. Further information on the Community Infrastructure Levy in East Suffolk can be found at https://www.eastsuffolk.gov.uk/community-infrastructure-levy/.

5 Duty to Co-operate

The Localism Act 2011 requires planning authorities to engage constructively, actively and on an ongoing basis with other prescribed bodies in relation to strategic cross-boundary planning matters.

There are a number of strategic cross-boundary planning matters that are relevant to East Suffolk, including those which have involved co-operation with adjoining planning authorities throughout the production of the Suffolk Coastal Local Plan and the Waveney Local Plan.

Suffolk Growth Partnership

- 5.2 <u>Suffolk Growth</u> is a partnership organisation that brings together local authority teams to develop and deliver the shared inclusive growth agenda. Suffolk Growth has led on the delivery of a number of projects related to enabling growth including the Suffolk Design project and associated guidance. During the monitoring year, the Suffolk Design Streets Guide was adopted by Suffolk County Council in July 2022.
- As part of the Suffolk devolution process partners are currently finalising where ongoing activity previously led by Suffolk Growth will sit. This forms part of the new Suffolk Economic Growth Governance structure which will become operational in April 2024 following the closure of New Anglia LEP.

Coastal Zone Management

- 5.4 East Suffolk Council, along with the Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority signed a <u>Statement of Common Ground</u> in relation to Coastal Zone Planning in September 2018. This sets out a series of shared aims and an agreed approach in relation to working together on coastal planning issues.
- 5.5 The day-to-day management of the coast in the district is delivered by Coastal Partnership East, a partnership which brings together the coastal management resources and expertise from Great Yarmouth Borough Council, North Norfolk District Council and East Suffolk Council.
- A <u>Coastal Adaptation Supplementary Planning Document</u>, covering the coast from Holkham in Norfolk to Felixstowe in Suffolk, has been prepared as a partnership between East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, the Broads Authority, and the Coastal Partnership East Team. Following public consultation between 25 January and 8 March 2023 the SPD was adopted by East Suffolk Council on 5 September 2023 and by the other partnership authorities during September and October 2023.

Ipswich Strategic Planning Area

- 5.7 The Ipswich Strategic Planning Area (ISPA) comprises the geographic area of the former Suffolk Coastal District, along with Ipswich Borough and Babergh and Mid Suffolk Districts. The authorities within this area have a long-established history of working together on cross-boundary planning matters.
- 5.8 The ISPA Board, comprises a councillor representative from each of these authorities and Suffolk County Council. The function of the Board, as set out in the Terms of Reference, is to provide a forum in which the five local authorities can work together to develop, promote and deliver their vision for the Ipswich Strategic Planning Area; to co-operate on the preparation and monitoring of local plans; and to provide a mechanism to ensure that all partners and stakeholders work together to deliver the housing and employment growth requirements for the area and coordinate the delivery of the necessary infrastructure.
- 5.9 The work of the Board has been documented through the production of a Statement of Common Ground, the latest of which was signed in March 2021 to accompany the submission of the Babergh and Mid Suffolk Joint Local Plan.
- 5.10 Action Notes from Ipswich Strategic Planning Area Board meetings, the Terms of Reference and the signed Statement of Common Ground (March 2021) can all be viewed on the ISPA website at www.ipswich.gov.uk/content/ipswich-strategic-planning-area.

The Norfolk and Suffolk Broads

- 5.11 The Norfolk and Suffolk Broads is a National Park that include Britain's largest protected wetlands and third largest inland waterway. The National Park covers parts of East Suffolk, South Norfolk, Great Yarmouth, Broadland, Norwich and North Norfolk and is managed by the Broads Authority. The Broads overlaps the northernmost part of East Suffolk along the River Waveney and Oulton Broad and takes in parts of Bungay and Beccles.
- 5.12 A 'Memorandum of Understanding' with the Broads Authority was signed by all the Authorities that border the Broads Authority area. This notes the statutory purposes imposed by the Norfolk and Suffolk Broads Act 1989 (as amended) and states the Broads Authority will not have a strategic housing target or the need to deliver a particular quantum of housing or employment development. The Districts will assess, for planning purposes, the housing and employment needs for their administrative areas and deliver wholly outside of the Broads area.
- 5.13 The 'Memorandum of Understanding' and 'Statement of Common Ground' with the Broads Authority are reproduced in the Appendices of the 'Duty to Cooperate Statement for the Waveney Local Plan' which can be viewed at www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Duty-to-Cooperate-Statement.pdf.

- 5.14 A review of the Broads Local Plan has commenced, and an 'Issues and Options' consultation took place in November and December 2022 to which East Suffolk Council responded. A review of both the 'Memorandum of Understanding' and 'Statement of Common Ground' will be required in due course.
- 5.15 East Suffolk and the Broads Authority meet quarterly to discuss strategic planning and cross-boundary matters. During the monitoring year, there has been joint working on a number of projects which partly or wholly extend into the Broads Authority area, namely the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), and the Coastal Adaptation Supplementary Planning Document, as referenced in paragraph 5.7 above.

Great Yarmouth Borough Council

- 5.16 The former Waveney area and Great Yarmouth Borough Council have an extensive history of working together. Waveney District Council and Great Yarmouth Borough Council signed a 'Memorandum of Understanding' in 2014 that commits the two authorities to work together on strategic planning matters. In February 2020 a <u>Statement of Common Ground</u> was agreed and signed between East Suffolk Council and Great Yarmouth Borough Council to address cross boundary planning matters.
- 5.17 The two authorities meet quarterly to discuss strategic planning and cross boundary matters. During the monitoring year, there was joint working on the Coastal Adaptation Supplementary Planning Document.
- 5.18 A review of the Great Yarmouth Local Plan has commenced and an 'Options' consultation was held in January and February 2023 to which East Suffolk Council responded.

6 Performance and effectiveness of the Suffolk Coastal and Waveney Local Plans

- 6.1 This document is supported by the <u>Planning Delivery dashboard</u> which provides information and data for the monitoring year for housing, employment, retail and town centres, climate change, design, and the natural and historic environments and provides an assessment on how the local plan polices are performing. The dashboard also includes time series data and interactive maps e.g. housing completions, retail and town centre surveys and progress on delivery of site allocations.
- 6.2 The table below presents some key statistics from the Planning Delivery dashboard:

New homes

812 new homes completed 2022/23

155 affordable homes completed 2022/23

7.6% of all affordable homes were First Homes – the first time this tenure type has been delivered in East Suffolk

55 extra care and 11 sheltered homes completed 2022/23

Retail and town centres

Lowestoft town centre has the highest vacancy rate at 26%, followed by Bungay at 18% and Halesworth at 13% – retail surveys May 2023

89 sqm of ground floorspace within the town centres has been lost to uses other than 'town centre and leisure uses' in 2022/23

Outside of designated areas - town centres, district and local centres – 1,036 sqm of town centre and leisure uses floorspace completed in 2022/23. Includes extension to a farm shop, seafront café and new unit on a retail park

Design

24 planning applications for residential development refused 2022/23 partially on design grounds The requirement to provide a proportion (50% in the Suffolk Coastal Local Plan area and 40% in the Waveney Local Plan area) for sites of 10 or more new homes to accessible M4(2) standards is likely to be superseded by Building Regulations in 2024

Natural and historic environment

No applications for major residential development (10 or more new homes) have been approved within the AONB during 2022/23

There has been no change to sites designated for landscape or wildlife value

30 designated heritage assets on the <u>Heritage at Risk</u> register (3 new assets added this year)

5 historic parks and gardens in the former Waveney area have been added to the <u>Local List</u>. These join the 15 historic parks and gardens in the former Suffolk Coastal area already on the local list

Climate change (Coastal erosion, Flood risk, Renewable energy and Sustainable construction)

<u>Coastal Adaptation Supplementary Planning Document</u> prepared and adopted by East Suffolk Council, Great Yarmouth Borough Council, North Norfolk District Council, The Broads Authority, and the shared Coastal Partnership East Team

4 projects for non-domestic renewable energy have been permitted in 2022/23. 3 schemes are to mount solar panels on the roof of commercial buildings and one solar farm

One application was approved against the advice of the Environment Agency. However, an existing certificate of lawful use would not have restricted the residential use of the building

<u>Sustainable Construction Supplementary Planning Document</u> adopted April 2022 to provide guidance on the implementation of the sustainable construction policies of the Local Plans

Employment

51,300 sqm net additional employment floorspace (10.97 hectares) delivered in East Suffolk 2022/23

Within the countryside, 3,100 sqm net additional floorspace (1.22 hectares) delivered 2022/23

2.3 hectares of employment land on allocated sites has been delivered to date, of 92.6 hectares allocated in the Local Plans

140.6 hectares of land has planning permission or is not yet developed on sites allocated in Local Plans and Neighbourhood Plans

Progress on site allocations

A total of 108 sites have been allocated for housing, employment, open space, care facilities or mixed-used development in the Local Plans and Neighbourhood Plans as at 31 March 2023 Approximately 13,316 new homes are allocated on housing or mixed-use sites. 3,866 new homes have been permitted of which 635 are complete

Approximately 108 hectares of land is allocated for employment development, of which almost 5 hectares has completed

- 6.3 Given the update to the NPPF in September 2023, with earlier updates in 2021 and 2019, there are now inevitably some inconsistencies with national planning policy in the two Local Plans; these are dealt with on a case-by-case basis in relation to planning applications.
- Similarly, some changes to national legislation for example, to the Use Classes Order in 2020 also mean that some Local Plan policies/supporting text inevitably do not reflect these changes.
 However, this does not necessarily mean that the policies are out-of-date for development management purposes.
- 6.5 Information as required by the regulations is set out below:

Appeal decisions

Appeal decisions	East Suffolk	Suffolk Coastal	Waveney
Dismissed	32	21	11
Allowed with conditions	14	12	2
Withdrawn	1	1	0
Total determined	47	34	13

- 6.6 In both the former Waveney and Suffolk Coastal area, only a couple of the appeal decisions referenced highlighted a potential lack of clarity in particular policies.
- 6.7 The continuing high dismissal rate (70%) shows that the Council was, overall, continuing to make 'correct' decisions on planning applications. Even in cases where appeals were allowed, it does not automatically mean that the Council got these decisions 'wrong' in many such cases, the Inspector simply reached a different planning judgment on the overall balance.
- 6.8 The quarterly <u>Strategic Planning Committee</u> receives an update on the appeal decisions received from the Planning Inspectorate following refusal of planning permission by East Suffolk Council.
- 6.9 In 2022/23, a number of appeals related to the policies on Small Scale Residential Development in the Countryside (Policy WLP8.7) or Housing in Clusters in the Countryside (Policy SCLP5.4). Partly as a result of this (but also due to other queries and uncertainties raised), the Housing in Clusters and Small Scale Residential Development SPD was prepared and adopted in November 2022, to provide greater clarity and guidance on common scenarios and questions for this kind of development.
- 6.10 A notable decision related to the development of the Ringsfield allocation WLP7.14 Land north of School Road. This is a 2.56 hectare site for approximately 30 dwellings but the application was for "up to" 33 dwellings, on 1.86 ha of the site. It was refused on the basis that it would represent over-development of the site, given the low-density character of the surrounding area. However, the appeal was allowed, with the Inspector concluding that the policy did not require the use of the whole site, was acceptable in terms of design, character and density and any proposal to develop the remainder of the site would need to be considered on its own merits at that time.
- 6.11 Two other notable appeal decisions related to specialist accommodation. Firstly, an appeal for a care village comprising an 80-bedroom care home and 72 assisted-cared bungalows in Melton. The Council considered that the location of the development (a countryside location between Ufford and Melton) was harmful, due to being outside of the Melton Neighbourhood Plan's Physical Limits Boundaries and in the 'countryside' as per policy SCLP 3.3 Settlement Boundaries Suffolk Coastal Local Plan, and its impacts on the overall character and appearance of the area. The Inspector concluded that the benefits of the scheme were not outweighed by the harms found in relation to the character and appearance of the area, in effect saying that it was premature (based on the

- relative youth of the SCLP) to conclude that the specialist accommodation approach set out in the Suffolk Coastal Local Plan was failing.
- The second appeal related to 80 assisted-living units in Halesworth. The Inspector's main conclusions 6.12 were that Policy WLP1.2 Settlement Boundaries does not restrict use class C2 extra-care accommodation in the countryside, and also that there is no policy requirement for evidence of the need for extra-care housing to be submitted in any case. The Inspector concluded that the site would deliver wider sustainability benefits and was therefore in conformity with Policy WLP8.2 Affordable Housing and so in conformity with the Local Plan generally.

Local Plan policies not being implemented

- 6.13 Regulation 34 of the Local Planning Regulations 2012 requires local authorities to identify which of their policies are not being implemented, to state the reasons why, and identify the steps (if any) being taken to rectify this. Such policies may need to be amended or replaced, for example if they no longer reflect national guidance or are no longer relevant to the local area.
- 6.14 Suffolk Coastal Local Plan policy SCLP9.2 Sustainable Construction has a requirement that all new developments of more than 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO₂ emissions below the Target CO₂ Emission Rate (TER) set out in the Building Regulations. This has been superseded by new Part L Building Regulations, which was published June 2021 with transitional arrangements until June 2023. The updated Part L Building Regulations require an approximate 30% reduction in CO₂ emissions for new residential buildings relative to the 2013 Part L Building Regulation standards. This planning policy requirement will therefore no longer be monitored.
- 6.15 All other policies are being implemented as intended. A review of permissions issued since the adoption of the Local Plans shows that the policies not being used in decision making are generally related to site specific allocations which have yet to be subject to a planning application.
- 6.16 The only other policies not currently being used are SCLP5.17 Gypsies, Travellers and Travelling Showpeople, WLP8.5 Gypsy and Traveller Sites, SCLP8.3 Allotments and SCLP5.15 Residential Moorings, Jetties and Slipways. Again, this is consistent with the lack of relevant applications to require assessment against these policies.

Housing delivery

Indicator	East Suffolk	Suffolk Coastal	Waveney
Net additional homes completed 2022-23	812	452	360
Affordable homes completed 2022-23	155	113	42

Indicator	East Suffolk	Suffolk Coastal	Waveney
(subset of net additional homes completed)			
Total housing delivered within plan	N/A	2,710	2,157
period		(2018-2036)	(2014-2036)
(plan period date)			

- 6.17 Housing completions in the Suffolk Coastal Local Plan area are equal to the requirement to date over the plan period (2,710 completions and 2,710 requirement). In the Waveney Local Plan area, despite housing completions generally increasing year on year, there has been under-delivery across the plan period (2,157 completions against 3,366 requirement).
- 6.18 The provision of housing for older people within residential institutions (C2) can be included in housing delivery figures. The contribution is based on the accommodation released in the housing market - for every 1.8 bed spaces in an institution, 1 housing unit is assumed. The figures below are in addition to the housing completions reported above.
 - 33 equivalent dwellings (58 bedrooms) in the Suffolk Coastal Local Plan area (2018-2023)
 - 30 equivalent dwellings (69 bedrooms) in the Waveney Local Plan area (2014-2023)
- 6.19 In addition to the sites already allocated for housing in the Local Plans and Neighbourhood Plans, in the monitoring year a further site was allocated in the Bungay Neighbourhood Plan for the development of approximately 70 dwellings - Policy H4 Land to the east of St Margaret's Road.

Employment land delivery

- 6.20 Employment land delivery was strong in 2022/23, with a net figure of 51,311 sqm completed, largely in the form of a single large site on the edge of Ipswich, the re-development of the former Orwell Truck Stop. Relatively little additional land was delivered in the former Waveney area.
- 6.21 Most of the larger allocated sites in the Waveney Local Plan (43ha in total) have yet to come forward, with no progress on the extension of the South Lowestoft Industrial Estate (Policy WLP2.17), for example. However, some of the sites are part of large mixed-used residential-led schemes, such as the North of Lowestoft Garden Village (8ha of employment land, Policy WLP2.13) and Beccles and Worlingham Garden Neighbourhood (5ha employment land, Policy WLP3.1), and in both these cases significant pre-application discussions and public engagement took place in 2022/23. The re-development of the some of the Council's own land at the PowerPark in Lowestoft (Policy WLP2.2) is also advancing well, with planning permission being granted for the Nexus scheme in 2022/23 and construction to take place in 2023/24.

Environmental policies

- 6.22 No applications for major residential development (10 or more homes) have been approved within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty during 2022/23.
- 6.23 The junction at Lime Kiln Quay Road, Thoroughfare and St. John's Street in Woodbridge had an Air Quality Management Area (AQMA) in place for some years, due to elevated levels of nitrogen dioxide. However, after recent improvements, the AQMA was formally revoked in September 2022.
- 6.24 During 2022/23, 17 proposals were refused as being contrary to the Historic Environment policy SCLP11.3 or WLP8.37.

Statement of Housing Land Supply (5-year land supply)

- 6.25 The National Planning Policy Framework (NPPF) requires local planning authorities to identify and update annually a supply of specific deliverable sites that are sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The supply is required to include a 5% buffer to ensure choice and competition in the market for land or a 20% buffer where there has been a persistent under-delivery of housing as evidenced through the Housing Delivery Test (NPPF para. 74). For sites to be considered deliverable they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within the five years.
- 6.26 The East Suffolk Statement of Housing Land Supply 2023 confirms (as at 31st March 2023):
 - The Suffolk Coastal Local Plan area of East Suffolk has a housing land supply of 6.34 years.
 - The Waveney Local Plan area of East Suffolk has a housing land supply of 5.62 years.
- 6.27 Further information can be found at https://www.eastsuffolk.gov.uk/housing-land-supply/.

Housing Action Plan

- 6.28 East Suffolk Council produces an annual Housing Action Plan to check the progress and success of actions to secure housing delivery and enable the Council to take early steps to minimise any future risk of under delivery. The Housing Action Plans can be found at www.eastsuffolk.gov.uk/housing-action-plan/.
- 6.29 The latest Housing Action Plan (HAP) was published in November 2022. The HAP is currently being reviewed and updated, to have a focus on sites that were expected to come forward (i.e. allocated sites in one of the two Local Plans) but which have either not yet come forward at all or have

planning permission but are being built out very slowly or appear to have stalled. It will identify potential actions for the Council to consider in relation to these sites, which could include:

- further conversations with the landowners/developers;
- attempts to acquire the sites by agreement (to be re-developed by the Council and/or another development partner); and
- (if necessary and appropriate) to seek compulsory purchase orders to acquire some such sites, again, to be developed out later by the Council and/or another development partner.

7 Sustainability Appraisal

7.1 The Sustainability Appraisal (SA) is an important part of the Local Plan making process. The Sustainability Appraisal process can be simplified as: (Stage A) collecting and analysing baseline evidence to help identify the key issues pertinent for the next Local Plan to address (setting Sustainability Objectives and a sustainability appraisal framework for assessing site allocations and policies), and then (Stage B) working as an iterative assessment of the sustainability of the emerging Local Plan's site allocations and policies, in a parallel process running alongside plan-making, up to the report collation and consultation stages (Stages C and D).

'Significant effects'

- 7.2 During this process the Sustainability Appraisal identifies which site allocations and policies may have 'significant effects' (positive or negative) against the Sustainability Objectives. The Sustainability Appraisal also establishes monitoring indicators related to the Sustainability Objectives e.g. to meet housing need > monitor how many homes are delivered. The SA monitoring indicators are distinct from, but often overlap with, the Local Plan monitoring indicators reported in the Planning Delivery dashboard with some key statistics provided in Chapter 6. Local Authorities are only required to monitor the performance of Local Plans against Sustainability Objectives where the potential for 'significant effects' was identified. This helps to ensure that any unforeseen adverse effects can be identified, and remedial action taken if required.
- 7.3 This chapter therefore reports on the performance of the Local Plans for the 2022/23 monitoring period against the subset of Sustainability Appraisal monitoring indicators where 'significant effects' were identified. The findings for the significant effects indicators for each Local Plan are reported in Appendix 1.
- 7.4 Whilst some indicators are monitored annually by the Council or external bodies, others are monitored less frequently, for example through the national Census. Results for some indicators will change rapidly to signal recent changes such as housing completions or employment figures, whilst others such as health indicators will show changes and trends over a longer timescale. This means that it is not always possible, practical or useful to report on every indicator every year. Where data is not available, this has been noted in the table in Appendix 1.

Suffolk Coastal Local Plan Significant Effects

7.5 The Sustainability Appraisal of the Suffolk Coastal Local Plan identified one significant negative effect of the plan, namely the impact on soil and mineral resources. The SA of the Local Plan also identified two significant positive impacts: meeting the housing requirements of the whole community and achieving sustainable levels of prosperity and economic growth throughout the plan area.

Analysis of current monitoring year: Suffolk Coastal Local Plan

A total of 452 new homes have completed this year, 47 fewer than the previous monitoring year. However, housing completions are exactly equal to the requirement over the plan period to date

Sustainability Objective: to meet the housing requirements of the whole community

(2,710 completions and 2,710 requirement). 113 affordable homes were completed this year, just one fewer than the previous year. The polices to deliver the overall housing requirement and

affordable homes appear to be performing well.

7.6

7.7 For affordable home tenures, the local plan requires 50% for rent, 25% for shared ownership and 25% for discounted market sale. For 2022/23 completions, 65% are rent (social and affordable); 25% shared ownership/shared equity and 11% First Homes. However, a number of these sites were approved under the previous policy which required 75% for rent tenures. As more sites approved under the current policies are developed the proportions of rent and ownership tenures are expected to even out. In 2021 the Government's First Homes Policy came into force. The Planning Practice Guidance suggests that 25% of all affordable housing delivered through developer obligations should be First Homes. The 25% First Homes can be accommodated with the Suffolk Coastal Local Plan Policy SCLP5.10 under the discounted market sale.

- 7.8 80% of all new homes delivered this monitoring year were houses, a 5% increase on the previous year. There was a 4% decrease in the number of flats (11%) delivered. 42% of the homes delivered were smaller properties (1 and 2 bedroom), with 34% being 3 bedroom homes and 24% being 4+ bedroom homes. The Suffolk Coastal Local Plan requires at least 40% of all new homes to be smaller, 1 and 2 bedroom homes; completions this year meet that requirement.
- 7.9 No care homes have completed this monitoring year. There is a significant need over the plan period for this housing type. However, much of this will be delivered through the build out of a number of housing allocations in the Local Plan with a specific requirement to provide housing for older people (sites listed at paragraph 5.45 of the Suffolk Coastal Local Plan).

7.10 Sustainability Objective: to conserve and enhance soil and mineral resources

As last year, 11% of new homes completed during this monitoring year were on brownfield land (or previously developed land) rather than on greenfield land. The figure for development on brownfield land may appear to be low and not consistent with national policy on making effective use of land, however, there is a limited supply of sustainably located brownfield land in East Suffolk and in particular within the Suffolk Coastal Local Plan area. Data is not available at district level for changes in recorded soil quality, though information for individual sites is available via the UK Soil Observatory.

7.11 Sustainability Objective: to achieve sustainable levels of prosperity and economic growth throughout the plan area

The 2022/23 monitoring year saw a smaller total net gain in the amount of employment floorspace delivered (49,717 sqm / 10.9 hectares) compared with the previous year (65,500 sqm / 12.1 hectares). Most of this development was through the build out of part of a single site comprising

two B8 storage or distribution warehouses (51,600 sqm 9.9 hectares). A total of 6,605 sqm of employment floorspace was lost over the 2022/23 monitoring year of which the majority was due to the demolition of the former Suffolk Coastal Council offices at Melton Hill, Woodbridge in order to facilitate its redevelopment as a residential-led mixed use development (Policy SCLP12.32).

- 7.12 Within the rural areas (outside of existing Employment Areas, employment allocations, or Settlement Boundaries), a net gain of 2,700 sqm of employment floorspace was delivered, compared with 4,000 sqm the previous year.
- 7.13 Between the previous (2021) and latest year (2022), there were no significant shifts in the proportions of employment by sector. The biggest change is in the 'Business, administration and support' services sector, which was down from 5.4% to 4.3%, followed by the 'Construction' sector, which had an increase from 5.4% to 6.4%. The largest sector remains the 'Wholesale and retail (including motor sales)' sector at 15.4%, followed by the 'Transport and storage (including postal)' and 'Accommodation and food services' sectors, both at 10.6% of the employment sectors.

Waveney Local Plan Significant Effects

7.14 The Sustainability Appraisal of the Waveney Local Plan identified one significant negative effect against the objective of conserving natural resources. As identified in the Sustainability Appraisal report, this relates primarily to the strategy of distributing growth around the district which involves a level of development on greenfield sites which cannot be entirely mitigated for. The Local Plan was also predicted to have significant positive impacts, across a range of social, environmental and economic sustainability objectives, specifically: conserving natural resources, improving health and well-being, access to key services, meeting housing need, achieving economic growth, and enhancing the rural economy.

Analysis of current monitoring year data: Waveney Local Plan

7.15 Sustainability Objective: to conserve natural resources

There was a 5% increase in the percentage of new homes completed on brownfield land (or previously developed land) this monitoring year compared to last year. The percentage of development on brownfield land may appear to be low (35%) and not consistent with national policy on making effective use of land but there is a limited supply of sustainably located brownfield land in East Suffolk. However, the Kirkley Waterfront and Sustainable Urban Neighbourhood is predominately brownfield land and once developed will provide 1,380 new homes in the heart of Lowestoft.

7.16 Sustainability Objective: to improve the health and well-being of the population
It is anticipated that as recommendations set out in the East Suffolk Cycling and Walking Strategy
(October 2022) are implemented, cycling and walking to work and school will increase amongst groups that are travelling to a place of work or education and to, from and within centres.

- 7.17 The percentage of adults (16+) that are active for an average of 150 minutes per week is available at district level. The latest data (November 2021-November 2022) does not cover the full monitoring period but does show a slight increase from 62.1% to 65.8%.
- 7.18 The percentage of children aged 10-11 years that are overweight including obese significantly increased in East Suffolk from 29.4% in 2019/20 to 39% in 2021/22, an almost 10% jump. -For comparison, the East of England average figure is 35.4% and the national average figure is 37.8%. The Child Measurement Programme was not undertaken in the year of 2020/21 due to COVID-19 restrictions.
- The percentage of adults (aged 18+) who are overweight or obese in East Suffolk is 63.9% in 7.19 2021/22, an increase from 61.8% the previous year, meaning the average is at almost two out of three adults carrying excess weight. For comparison, the East of England average figure is 63.9% and national average figure is 63.8%.
- 7.20 There is no new data on life expectancy. Healthy life expectancy and disability-free life expectancy is measured at Suffolk level.
- 7.21 The forthcoming Healthy Environments Supplementary Planning Document (estimated adoption spring 2024) will guide the delivery of built environments that support health, wellbeing and greater inclusivity through better active travel infrastructure, higher quality green open space and play provision, and homes, schools, and workplaces. It is intended that healthier development over time contributes towards improvements to key public health indicators such as healthy life expectancy, disability-free life expectancy, weekly activity engagement, and healthier weight status for adults and children.

7.22 Sustainability Objective: to improve access to key services and facilities

No specific metrics for monitoring the performance of the Waveney Local Plan against this Sustainability Objective have been identified. However, the drive to improve the accessibility of key services and facilities has been part of the impetus to bring forward the East Suffolk Cycling and Walking Strategy (adopted October 2022) and the forthcoming Healthy Environments Supplementary Planning Document (estimated adoption, spring 2024).

- 7.23 Sustainability Objective: to meet the housing requirements of the whole community A total of 360 new homes have completed this year, an increase from 323 the previous year. However, this is still below the annual target of 374 new homes per year. Despite housing completions generally increasing year on year, there has been under delivery across the plan period (2,157 completions against 3,366 requirement).
- 7.24 The number of affordable homes completed this year fell to 42 compared to 111 the previous year. However, the 2021/22 figure was significantly higher than previous years and on average 61 new affordable homes are completed each year. Across the plan period, 26% of all new homes are affordable homes (554 of 2,157).

- 7.25 The Local Plan requires at least 40% of new homes to be smaller 1 or 2 bedroom homes. It is likely that major sites of 10 or more homes have the greatest capacity to deliver a range of house sizes. 51% of all new homes completed this year are smaller (1 or 2 bedroom), compared to 43% the previous year.
- 7.26 Affordable rent tenures account for 41% of affordable completions this year, compared to 83% the previous year. As sites approved under the current policy (50% rent and 50% shared ownership or discounted market sale) are built out the balance between rent and ownership tenures is anticipated to even out.
- 7.27 One care home (13 bedrooms) was lost this year through change of use to a home for people with specialist needs. As noted above in paragraph 6.12, an 80-unit assisted-living (extra-care) scheme was approved on appeal at Halesworth. There is a significant need for specialist housing, including care homes and nursing homes, over the plan period. Some of this need will be met through the requirement to provide retirement communities as part of the development on allocations such as Kirkley Waterfront and Sustainable Urban Neighbourhood and North of Lowestoft Garden Village.
- 7.28 Sustainability Objective: to achieve sustained and resilient economic growth
 - An overall net gain of 1,614 sqm employment floorspace was recorded this year (3,089 sqm gained 1,475 sqm lost). This compares to an overall loss of 2,908 sqm the previous year. Within the existing employment areas, a net gain of 2,472 sqm floorspace was recorded (2,684 sqm gained – 212 sqm lost). The largest increase recorded was for general industrial (B2) totalling 2,400 sqm for the expansion of a plastic manufacturer.
- 7.29 An overall net loss of 92 sqm of town centre uses and leisure floorspace was recorded this year (235 sqm gained but 327 sqm lost). However, this is an improvement on the overall net loss of 1,549 sqm floorspace the previous year. Retail uses recorded a net loss of 39 sqm; cafes/restaurants a net gain of 16 sqm, pubs a net loss of 119sqm and hot food takeaways a net gain of 50 sqm. However, specifically within the town centres a net gain of 30 sqm retail floorspace was recorded; this was through an extension to an existing supermarket in Southwold.
- 7.30 Retail unit vacancy rates in the Waveney Local Plan area's town centres vary from 9% (Southwold) to 26% (Lowestoft) with all, except Bungay town centre with a minor improvement, worsening between the current and previous monitoring year. However, the majority of the district's town centres' vacancy rates compare favourably with the national average figure of 13.9% (Q2 2023, British Retail Consortium). Although vacancy rates are an important indicator of local economic performance, they should be considered within the context of the general economic and cultural shift away from communities wanting their centres to be mainly for meeting retail needs, to wanting them to offer a more holistic social, leisure and entertainment experience, and opting to meet some or most of their retail needs online instead. Though this general shift will not affect all centres equally, it may be necessary for the resilience of some centres to shrink their overall retail areas, and instead offer a 'quality over quantity' range of goods, services and experiences to their communities.

- 7.31 Employment amongst working age people (16-64 years) in East Suffolk has increased from 77% in 2021/22 to 83.7% in 2022/23. This is higher than the regional rate of 78% and England rate of 75.7%. There have been some shifts between all occupation types between the current (2022/23) and previous years (2021/22). The most significant changes are those employed in 'associate professional occupations' (increase from 8.1% to 16.9%), 'elementary occupations' (increase from 5.7% to 13.9%) and 'professional occupations' (decrease from 22.1% to 15.9%).
- 7.32 Between the previous (2021) and latest year (2022), there were no significant shifts in the proportions of employment by sector. The biggest change is in the 'Business, administration and support' services sector, which was down from 5.4% to 4.3%, followed by the 'Construction' sector which had an increase from 5.4% to 6.4%. The largest sector remains the 'Wholesale and retail (including motor sales)' sector at 15.4%, followed by the 'Transport and storage (including postal)' and 'Accommodation and food services' sectors both at 10.6% of the employment sectors.

7.33 Sustainability Objective: to enhance the rural economy

There was a small amount of net gain in employment uses in rural areas (outside of Settlement Boundaries, existing employment areas and employment allocations), through the conversion of an agricultural building, resulting in 405 sqm of additional employment floorspace.

7.34 There were generally low levels of delivery of new housing in the rural areas (outside of Settlement Boundaries), with the exception of Beccles, where a total of 60 new homes were delivered, of which 24 were affordable homes. However, these were within a housing allocation (Policy WLP3.2 Land west of London Road, Beccles). If excluding this plan-led housing allocation (which is adjacent to the current Settlement Boundary on two sides), the figures reduce to 50 total new homes and no affordable homes. No care home, extra care or sheltered housing was delivered outside of Settlement Boundaries during the 2022/23 monitoring year.

Appendix 1 - Sustainability Appraisal significant effects indicators

Suffolk Coastal Local Plan – Sustainability Appraisal indicators with significant effects

Suffolk Coastal	Type of	SA Indicator	2022/23 data
Sustainability Objective	effect		(performance compared with previous monitoring period)
To meet the housing	Positive	New homes completed in the monitoring year	Total: 452 (decrease, -47)
requirements of the			of which affordable homes: 113 (decrease, -1)
whole community		New homes approved in the monitoring year	Total: 848 (decrease, -199)
		Figures include approval of reserved matters	of which affordable homes: 313 (increase, +52)
		and renewal of consent approved in previous	
		years	
		Recorded homelessness rates	MHCLG Homelessness statistics East Suffolk, 2022-23
			1,115 Households assessed; 1,089 Households assessed as owed
			a duty (97.7%) (decrease, -1.2% assessed as owed a duty)
		Net additional dwellings – type, size and	<u>Type</u>
		tenure	House: 80% (increase, +5%)
			Bungalow: 9% (no change)
			Flat: 11% (decrease, -4%)
			Mobile Home 0% (no change, <1%)
			Size (number of bedrooms)

Suffolk Coastal	Type of	SA Indicator	2022/23 data
Sustainability Objective	effect		(performance compared with previous monitoring period)
			1 bedroom: 16% (increase, +2%)
			2 bedrooms: 26% (decrease, -1%)
			3 bedrooms: 34% (no change)
			4+ bedrooms: 24% (no change)
			Not known: <1% (no change)
			Affordable housing tenure types
			Social rent: 4% (decrease, -11%)
			Affordable rent: 61% (decrease, -4%)
			Shared ownership: 23% (increase, +12%)
			Shared equity: 2% (decrease, -7%)
			First Homes: 11% (first year for completions of this tenure type)
			Care homes
			Care home completions: none (decrease, previous year 55-bed
			care home)
To conserve and	Negative	Percentage of development recorded on	New homes
enhance soil and		greenfield or brownfield land (previously	Greenfield land: 89% (no change)
mineral resources		developed land)	Brownfield land: 11% (no change)
		Change in recorded soil quality	Data not available at Local Authority level – information on soil
			quality on individual sites is available via the $\underline{\text{UK Soil Observatory}}$
		Allocations recorded on best agricultural land	Agricultural land quality impacts were considered during the
		quality (1,2,3)	assessment of site-specific policies of the Suffolk Coastal Local
			Plan. The wording of this indicator does not specifically require
			us to monitor change. The most useful information regarding
			soil quality impacts is the percentage split of greenfield and

Suffolk Coastal	Type of	SA Indicator	2022/23 data
Sustainability Objective	effect		(performance compared with previous monitoring period)
			brownfield development over this monitoring period as
			presented above.
To achieve sustainable	Positive	Estimated new job creation	No data available.
levels of prosperity and		Net additional gains in employment land	Gains: 56,322 sqm / 11.4 hectares
economic growth		development	Losses: 6,605 sqm / 0.52 hectares
throughout the plan		Use classes E(g), B2 and B8	Net change: 49,717 sqm / 10.92 hectares (decrease, -15,822
area			sqm)
		Business formation rate	ONS, Business demography, UK, 2021
			East Suffolk figures:
			Births 1,050 (increase, +1700)
			Deaths 880 (increase, +70)
			Active Enterprises 9,710 (increase, +275)
			NB 2020 data reported in last year's AMR has since been updated and changes
			between 2020 and 2021 reported here relate to updated data.
		Number of businesses paying business rates	No data.
		Numbers employed by industry	NOMIS, Business Register and Employment Survey, 2022
		NB proportions are more useful	East Suffolk figures: Agriculture, forestry & fishing (A): 2.7%;
			Mining, quarrying & utilities (B, D and E): 1.6%; Manufacturing
			(C): 9.6%; Construction (F): 6.4%; Wholesale and retail including
			motor trades (G):15.4%; Transport & storage (incl. postal) (H):
			10.6%; Accommodation & food services (I): 10.6%; Information
			& communication (J): 4.8%; Financial & insurance (K): 1%;
			Property (L): 1.3%; Professional, scientific & technical (M): 4.8%;
			Business administration & support services (N): 4.3%; Public

Suffolk Coastal	Type of	SA Indicator	2022/23 data
Sustainability Objective	effect		(performance compared with previous monitoring period)
			administration & defence (O): 4.3%; Education (P): 8.5%; Health
			(Q): 10.6%; Arts, entertainment, recreation & other services
			(R,S,T and U): 3.7%

Waveney Local Plan – Sustainability Appraisal indicators with significant effects

Waveney Sustainability	Type of	SA Indicator	2022/2023 data
Objective	effect		(performance compared with previous monitoring period)
To conserve natural	Negative	Number and percentage of dwellings	Brownfield land: 35% (increase, +6%)
resources		completed on previously developed land	Greenfield land: 65% (decrease, -6%)
		Area of high grade agricultural land lost to	Housing - sites of 10 or more dwellings
		housing and economic development	None (no change)
			Employment development – floorspace of 1,000sqm or more (or
			1 hectare or more)
			None (no change)
To improve the health	Positive	Proportion of journeys to work on foot or by	The 2021 Census was taken on 21st March 2021. The national
and well-being of the		cycle	lockdown, associated guidance and furlough measures will have
population			affected the travel to work topic.
			Figures based on Wards within the former Waveney district:
			Working mainly at or from home: 20% (increase, +15%)
			Travelling to work by bicycle: 4% (decrease, -2%)
			Travelling to work on foot: 9% (decrease, -2%)

Waveney Sustainability	Type of	SA Indicator	2022/2023 data
Objective	effect		(performance compared with previous monitoring period)
		Percentage of population completing 3 x 30 minutes physical activity per week Data no longer available	Sport England, Active Lives Online, November 2021-November 2022. Adults 16+ active an average of 150+ minutes a week, East Suffolk figures: 65.8% (increase, +3.7%)
		Obesity in the population Life expectancy	Public Health England, Public Health Profiles, National Child Measurement Programme, 2021/22. East Suffolk figures: Children aged 10-11 (Year 6): 39% (increase from 29.4% in 2019/20). NB no Child Measurement Programme undertaken in 2020/21 Public Health England, Public Health Profiles, Active Lives Survey, Sport England, 2021/22. East Suffolk level: Adults aged 18+: 63.9% (increase, +2.1%) Life expectancy at birth (East Suffolk, 2018-2020)
		Life expectancy	80.4 Males 83.8 Females
To improve access to key services & facilities	Positive	Accessibility to key services and facilities	No data available.
To meet the housing requirements of the whole community	Positive	Amount and type of new housing, including extra care/sheltered housing and number of care/nursing home beds	Total: 360 (increase, +37) Of which affordable homes: 42 (decrease, -69) Type House: 80% (increase, +13%) Bungalow: 9% (decrease, -5%) Flat: 11% (decrease, -7%) Mobile Home: <1% (same) Size (number of bedrooms)

Waveney Sustainability	Type of	SA Indicator	2022/2023 data
Objective	effect		(performance compared with previous monitoring period)
			1 bedroom: 18% (decrease, -4%)
			2 bedrooms: 33% (decrease, -4%)
			3 bedrooms: 29% (increase, +3%)
			4+ bedrooms: 19% (increase, +5%)
			Not known: <1% (no change)
			Affordable housing tenure types
			Social rent: 2% (decrease, -2%)
			Affordable rent: 43% (decrease, -40%)
			Shared ownership: 60% (increase, 13%)
			Shared equity: 0% (decrease, -4%)
			<u>Care homes</u>
			Care home completions: loss of 13-bed care home to HMO
			(decrease, 13 bedrooms) and approval on appeal of an 80-unit
			assisted-living scheme
To achieve sustained	Positive	Amount and type of employment	Employment development
and resilient economic		development	Gains: 3,089 sqm / 0.21 hectares
growth		Use classes E(g), B2 and B8	Losses: 1,475 sqm / 0.17 hectares
			Net change: 1,614 sqm / 0.04 hectares (improvement, 2021/22
			reported a net change of -2,908 sqm)
		Amount and type of retail and leisure	Retail and leisure development
		development	Gains: 235 sqm
		Use classes E(a)-E(c), SG drinking	Losses: 327 sqm
		establishments, SG hot hood takeaways, E(d)	Net change: -92 sqm (improvement, 2021/22 reported a net
		and SG cinema	change of -1,549 sqm)

Waveney Sustainability	Type of	SA Indicator	2022/2023 data
Objective	effect		(performance compared with previous monitoring period)
		Jobs density	NOMIS, Jobs Density, 2019
			0.79 – East Suffolk as of 2019.
			No data available for East Suffolk for 2020 and 2021 as sample
			size is too small to allow data to be produced.
		Employment by occupation	NOMIS, Annual Population Survey, 2022/23
			East Suffolk figures: Managers, directors and senior officials:
			10.2%; Professional occupations: 15.9%; Associate professional
			occupations: 16.9%; Administrative and secretarial occupations:
			10.4%; Skilled trades occupations: 8.9%; Caring, leisure and
			other service occupations: 12.3%; Sales and customer service
			occupations: 6%; Process, plant and machine operatives:5.7%;
			Elementary occupations: 13.9%
		Employee jobs by industry	NOMIS, Business Register and Employment Survey, 2022
			East Suffolk figures: Agriculture, forestry & fishing (A): 2.7%;
			Mining, quarrying & utilities (B, D and E): 1.6%; Manufacturing
			(C): 9.6%; Construction (F): 6.4%; Wholesale and retail including
			motor trades (G):15.4%; Transport & storage (incl. postal) (H):
			10.6%; Accommodation & food services (I): 10.6%; Information
			& communication (J): 4.8%; Financial & insurance (K): 1%;
			Property (L): 1.3%; Professional, scientific & technical (M): 4.8%;
			Business administration & support services (N): 4.3%; Public
			administration & defence (O): 4.3%; Education (P): 8.5%; Health
			(Q): 10.6%; Arts, entertainment, recreation & other services
			(R,S,T and U): 3.7%

Waveney Sustainability	Type of	SA Indicator	2022/2023 data
Objective	effect		(performance compared with previous monitoring period)
To enhance the rural	Positive	Employment uses (E(g), B2 and B8) completed	Employment uses completed:
economy		in the rural areas.	405 sqm gains (decrease, -177 sqm)
		Rural areas defined as outside of Settlement	0 losses (no change)
		Boundaries (WLP1.2), existing employment	405 sqm net gain (decrease, -177 sqm)
		areas (WLP8.12) and employment allocations	Conversion of agricultural building (Bungay)
		Amount and type of new housing, including	Net additional homes completed:
		extra care/sheltered housing and number of	31% of all new homes have completed outside of settlement
		care/nursing home beds within the rural areas	boundaries (110 of 360). However, 60 of these new homes are
		Rural areas defined as outside of Settlement	within a housing allocation (policy WLP3.2 Land west of London
		Boundaries (WLP1.2).	Road, Beccles). If excluding this plan-led housing allocation,
			adjacent on two sides to the current settlement boundary, the
			figure reduces to 14%
			Affordable homes completed:
			57% of all affordable homes have completed outside of
			settlement boundaries – these are all on a single site. However,
			these homes are within a housing allocation (policy WLP3.2 Land
			west of London Road, Beccles). If excluding this plan-led housing
			allocation, adjacent on two sides to the current settlement
			boundary, the figure reduces to 0%
			Housing for older people:
			No care home completions (no change)





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