



**STRATEGIC PLANNING COMMITTEE**

**Monday, 08 January 2024**

<b>Subject</b>	Authority Monitoring Report 2022/23
<b>Report of</b>	Councillor Kay Yule Cabinet Member with responsibility for Planning and Coastal Management
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Is the report Open or Exempt?	OPEN
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Category of Exempt Information and reason why it is <b>NOT</b> in the public interest to disclose the exempt information.	Not applicable
<b>Wards Affected:</b>	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 2022/23 AMR covers the monitoring period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.

### **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 Council publishes the East Suffolk Authority Monitoring Report covering the period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.
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 documents prior to formally publishing them.

## 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 Planning and Coastal Management.

**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. It will also be made available for inspection at the Council's two principal offices (Riverside, Lowestoft and East Suffolk House, Melton) during office hours.

**Risk:**

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

<b>External Consultees:</b>	None
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## Strategic Plan Priorities

Select the priorities of the <a href="#">Strategic Plan</a> which are supported by this proposal: <i>(Select only one primary and as many secondary as appropriate)</i>		Primary priority	Secondary priorities
<b>T01</b>	<b>Growing our Economy</b>		
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"/>
<b>T02</b>	<b>Enabling our Communities</b>		
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"/>
<b>T03</b>	<b>Maintaining Financial Sustainability</b>		
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"/>
<b>T04</b>	<b>Delivering Digital Transformation</b>		
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"/>
<b>T05</b>	<b>Caring for our Environment</b>		
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"/>
<b>XXX</b>	<b>Governance</b>		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<b>How does this proposal support the priorities selected?</b>			
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.			

## Background and Justification for Recommendation

<b>1 Background facts</b>	
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	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: <ul style="list-style-type: none"> <li>• Progress on the Local Plan against the timetable in the Local Development Scheme;</li> <li>• Details of any Neighbourhood Plans or Neighbourhood Development Orders that have been ‘made’ (adopted);</li> <li>• Any action taken under the Duty to Co-operate;</li> <li>• Details of any policies not being implemented;</li> <li>• Net amount of additional affordable housing; and</li> <li>• Total housing (and affordable housing) completed against annual requirements.</li> </ul>
1.3	Previous years’ AMRs <a href="#">have published all information within a single, lengthy, report</a> , with background information available on the Council’s <a href="#">Open Data portal</a> . For the 2022/23 year, a full review of the AMR production process was undertaken, with a desire to streamline the reporting process and make it more user-friendly by making better use of technology.
1.4	The 2022/23 AMR comprises two main elements. Firstly, a concise ‘regulatory’ report has been produced (see Appendix 1), which contains the key information required by the legislation (see paragraph 1.2 above). Secondly, more detailed analysis of key and supporting information, including some time-series information, has been produced in a ‘StoryMap’ format, called the <a href="#">Planning Delivery Dashboard</a> . As in previous years, the Open Data portal is available for people to download information in various different formats (like GIS shapefiles and Excel spreadsheets).

1.5	This AMR therefore covers the monitoring period 1 <sup>st</sup> April 2022 to 31 <sup>st</sup> March 2023 and provides monitoring information against indicators in the Local Plans, such as housing completions, town centre uses, environmental designations and the planning applications that the Council received.
1.6	The Suffolk Coastal Local Plan was adopted in September 2020. This is therefore the second AMR covering a full year of monitoring information. The Local Plan covering the former Waveney area was adopted in March 2019 and this is therefore the fourth monitoring report covering the Waveney Local Plan.
1.7	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).

## 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 preparation and monitoring process.
2.2	Chapter 1 introduces the document, with Chapter 2 outlining the progress against the Local Development Schemes. As both Local Plans are adopted and no Local Plan preparation work took place during 2022/23, there were no milestones for this monitoring period.
2.3	As set out in Chapter 3, many Neighbourhood Plans progressed their production during 2022/23, with five 'made' (adopted) – Bungay; Halesworth; Lound, Ashby, Herringfleet & Somerleyton; Oulton; and Worlingham. As at 31 <sup>st</sup> March 2023, there were a total of 19 'made' Neighbourhood Plans.
2.4	<p>Chapter 4 relates to the developer financial contributions, which comprise Community Infrastructure Levy (CIL) receipts and S106 legal agreement and RAMS habitat mitigation. 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 Plans growth. The <a href="#">2022/23 IFS</a> was approved by Cabinet in September 2023 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 2022/23 are:</p> <ul style="list-style-type: none"> <li>• CIL received in the monitoring period was £6.8m (a £600,000 increase from the previous year)</li> <li>• Total developer contributions (S106 contributions and RAMS habitat mitigation) received by East Suffolk Council was £400,000, a drop from the previous year. Other contributions, for highways works or education purposes (for example), were made to direct to Suffolk County Council). Any contributions directly received by other bodies are reported in their own Infrastructure Funding Statements</li> <li>• The East Suffolk CIL Charging Schedule was adopted in June 2023 and came into effect on 1<sup>st</sup> August 2023. This replaced (for new planning permissions) the Waveney and Suffolk Coastal CIL Charging Schedules</li> </ul>

2.5	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, such as the emerging Great Yarmouth Local Plan. This is reported in Chapter 5.
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2.6

Chapter 6 details how the Suffolk Coastal and Waveney Local Plans have been implemented, performed and delivered over the monitoring period:

- Housing – 812 new homes were completed during the monitoring period (452 in Suffolk Coastal and 360 in Waveney), a small decline compared to 822 in the previous year. In terms of affordable homes, a total of 155 were completed (113 in Suffolk Coastal and 42 in Waveney), a decline compared to 225 in 2021/22, although recent figures show that the delivery of affordable housing can vary considerably from year-to-year, largely because affordable housing tends to be completed in large groups at the same time rather than market units, which are delivered more steadily. An update to the Council’s Housing Action Plan is currently underway, setting out some commentary on the current state of the housing market in the district and potential actions to improve the delivery of housing. It is anticipated this will be published early in 2024;
- Planning appeals – a significant decline in appeals (a total of 47 compared to 64 in 2021/22) but the dismissal rate remains high (about 70%), which shows that the Council is continuing to generally make appropriate 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. The main development was two warehouses at Orwell Logistics Park, totalling 51,600m<sup>2</sup>. Of employment floorspace lost, the majority (6,000m<sup>2</sup>) was the demolition of the former Suffolk Coastal District Council’s offices at Woodbridge prior to it being re-developed for housing;
- Retail – the number of vacant units in the town centres changed relatively little overall, with some rising slightly, some falling slightly and some remaining unchanged. Lowestoft continues to have the highest proportion of vacancies, increasing from 24% to 26% and there were small increases in Beccles, Halesworth and Woodbridge (with vacancy rates of about 10%). Small improvements were seen in Aldeburgh and Felixstowe, with Aldeburgh having the lowest vacancy rate overall, with only a single unit (just over 1%);
- Climate Change – Just one planning application was approved against Environment Agency advice on flood risk, but this was due to there already being a ‘fallback’ position for residential development for the conversion, so it could not sensibly be resisted. In addition:
  - the [East Suffolk Cycling & Walking Strategy](#) was adopted in October 2022
  - there was continued work (with Great Yarmouth Borough Council, North Norfolk District Council and the Broads Authority) on the preparation of a single [Coastal Adaptation Supplementary Planning Document](#), which was adopted in September 2023;
- Natural Environment – Air quality is generally good in the district. No instances of nitrogen dioxide above the national objective level of 36µg/m<sup>3</sup> have been recorded in recent years.. Of the two remaining Air Quality Management Areas, one at Woodbridge had been under the limit for some years and was formally de-designated in September 2022. The other AQMA, at Stratford St Andrew, has seen improvements too and it is hoped that it will continue to stay below the 36µg/m<sup>3</sup> limit, which could lead to the de-designation process eventually too;

	<ul style="list-style-type: none"> <li>• <u>Historic Environment</u> – key points are: <ul style="list-style-type: none"> <li>○ 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 Heritage Action Zone (which ended on March 2023), 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 some previous years</li> <li>○ One replacement Conservation Area appraisal was approved, (Thorpeness, in June 2022) with public consultation for a new Conservation Area for Aldeburgh Park and a review of the Southwold Conservation Areas undertaken in early 2023</li> </ul> </li> </ul>
2.7	<p>The 2012 Regulations require that any non-implemented Local Plan policies are identified, with the reasons why and any appropriate steps being taken to rectify this. Only one policy is now not being implemented – part of Suffolk Coastal Local Plan policy SCLP9.2, Sustainable Construction. This is because Part L of the Building Regulations now requires a 30% reduction in CO<sub>2</sub> emissions, higher than the 20% set out in SCLP9.2. The policy won’t be monitored any more, as essentially all new dwellings will need to achieve this standard and it will be secured through the Building Control inspection regime.</p> <p>Four policies (SCLP5.17 Gypsies, Travellers and Travelling Showpeople, WLP8.5 Gypsy and Traveller Sites, SCLP8.3 Allotments and SCLP5.15 Residential Moorings, Jetties and Slipways) have not been used in decision-making so far. As with various site allocations policies where the sites have not yet come forward, this is consistent with the lack of relevant applications to require assessment against these policies and so does not indicate that these policies are “failing”.</p> <p>As a note, the Waveney Local Plan will be five years old in March 2024, and the required assessment of whether it should be reviewed will be prepared and published in 2024.</p>
2.8	<p>Chapter 7 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.</p>
2.9	<p>The AMR for the monitoring period 2022/23 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.</p>

### **3 Relationship to Housing Land Supply**

3.1	<p>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.</p>
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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 2023.
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 National Planning Policy Framework. 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	<p>The <a href="#">Statement of Housing Land Supply as at 31<sup>st</sup> March 2023</a> was published in November 2023, and are little changed from the previous year, with just small reductions. For both Local Plan areas, there is more than the minimum 5-year supply:</p> <ul style="list-style-type: none"> <li>• Suffolk Coastal Local Plan area: 6.34 years (previously 6.47 years)</li> <li>• Waveney Local Plan area: 5.62 years (previously 5.78 years)</li> </ul>
3.5	Whilst the numbers are similar, the updated assessment includes sites granted permission over the course of 2022/23, 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 2023 (to be published in early 2024). 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 high interest rates and falling house prices, 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 (and whether the Council can assist with resolving any such issues), 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 2022/23, 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:

<b>Appendix A</b>	East Suffolk 'Regulatory' Authority Monitoring Report 2022/23
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### Background reference papers:

Date	Type	Available From
November 2023	Statement of Housing Land Supply as at 31 <sup>st</sup> March 2023, and appendices	<a href="http://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/">www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/</a>
Various	Housing Action Plan	<a href="http://www.eastsuffolk.gov.uk/planning/housing-action-plan/">www.eastsuffolk.gov.uk/planning/housing-action-plan/</a>