

Strategic Planning Committee

Members are invited to a **Meeting of the Strategic Planning Committee** to be held in the Deben Conference Room, East Suffolk House, Melton on **Monday, 8 July 2024** at **10.30am**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at https://youtube.com/live/UbQR4pBhAx0?feature=share

Members:

Councillor Sarah Plummer (Chair), Councillor Mark Packard (Vice-Chair), Councillor Paul Ashdown, Councillor Paul Ashton, Councillor Seamus Bennett, Councillor Tom Daly, Councillor Mike Deacon, Councillor Deborah Dean, Councillor Julia Ewart, Councillor John Fisher, Councillor Andree Gee, Councillor Katie Graham, Councillor Colin Hedgley, Councillor Mike Ninnmey, Councillor Graham Parker, Councillor Malcolm Pitchers, Councillor Rosie Smithson, Councillor Geoff Wakeling, Councillor Kay Yule.

An Agenda is set out below.

Part One - Open to the Public

Pages

1 Election of Chair

To elect a Chair for the 2024/25 Municipal Year.

2 Election of Vice-Chair

To elect a Vice-Chair for the 2024/25 Municipal Year.

3 Apologies for Absence and Substitutions

4 Declarations of Interest

Members and Officers are invited to make any declarations of interests, and the nature of that interest, that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.

5 Declarations of Lobbying and Responses to Lobbying

To receive any Declarations of Lobbying in respect of any item on the agenda and also declarations of any response to that lobbying.

6 Minutes 1 - 9

To confirm as a correct record the Minutes of the last Meeting held on 8 April 2024.

Part One – Open to the Public Page		
7	Energy Projects Update To receive a presentation on energy projects within East Suffolk from the Cabinet Member with responsibility for Energy and Climate Change.	
8	Major Sites Update To receive an update from the Head of Planning, Building Control and Coastal Management in relation to Major Sites within East Suffolk.	
9	Planning Policy and Delivery Update ES/2007 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	10 - 21
10	Making of New Article 4 Directions in Southwold, Wangford, Homersfield, Marlesford and Walberswick Quay ES/2002 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	22 - 85
11	Annual Planning Performance Report - 1 April 2023 to 31 March 2024 ES/2005 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	86 - 105
12	Appeal Performance Report - 11 March 2024 to 4 June 2024 ES/2003 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	106 - 112
13	Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024 ES/2006 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	113 - 312
14	Enforcement Performance Report - January to March 2024 ES/2001 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	313 - 321
15	Enforcement Improvement Action Plan Update ES/2004 The report of the Cabinet Member with responsibility for Planning and Coastal Management.	322 - 337
16	Member Training on Planning To receive an update from the Head of Planning, Building Control and Coastal Management.	
Part Two – Exempt/Confidential Pages		

There are no Exempt or Confidential items for this Agenda.

Close



Chris Bally, Chief Executive

If you require this document in large print, audio or Braille or in a different language, please contact the Democratic Services Team on 01502 523521 or email: democraticservices@eastsuffolk.gov.uk

Filming, Videoing, Photography and Audio Recording at Council Meetings

The Council, members of the public and press may record / film / photograph or broadcast this meeting when the public and press are not lawfully excluded.

The Council cannot guarantee public seating areas will not be filmed or recorded. By entering the Conference Room and sitting in the public seating area, those present will be deemed to have consented to the possible use of filmed images and sound recordings. If you do not wish to be recorded, please speak to a member of the Democratic Services team at the earliest opportunity.





The national Charter and Charter Plus
Awards for Elected Member Development

East Suffolk Council is committed to achieving excellence in elected member development

www.local.gov.uk/Community-Leadership

Unconfirmed



Minutes of a Meeting of the **Strategic Planning Committee** held in the Conference Room, Riverside, on **Monday, 08 April 2024** at **10:30 AM**

Members of the Committee present:

Councillor Paul Ashdown, Councillor Paul Ashton, Councillor Tom Daly, Councillor Mike Deacon, Councillor Julia Ewart, Councillor John Fisher, Councillor Andree Gee, Councillor Katie Graham, Councillor Colin Hedgley, Councillor Mike Ninnmey, Councillor Mark Packard, Councillor Graham Parker, Councillor Malcolm Pitchers, Councillor Sarah Plummer, Councillor Geoff Wakeling, Councillor Kay Yule

Other Members present:

Councillor Peter Byatt

Officers present: Katy Cassidy (Democratic Services Officer), Andrea McMillan (Interim Joint Head of Planning), Bethany Rance (Senior Planner - Energy Projects), Philip Ridley (Head of Nationally Significant Infrastructure Planning), Katherine Scott (Principal Planner (Development Management, Technical Lead)), Alli Stone (Democratic Services Officer), Isaac Stringer (Assistant Planner), Ben Woolnough (Interim Joint Head of Planning), Karolien Yperman (Design and Heritage Officer)

1 Apologies for Absence and Substitutions

Apologies for absence were received from Councillor McCallum and Councillor Smithson. Councillor Byatt attended as substitute for Councillor Smithson.

2 Declarations of Interest

Councillor Ewart declared a Non-Registerable interest in item four as a member of the Leiston Patient Participation Group.

3a Minutes - January 2024

RESOLVED

That the minutes of the meeting held on 8 January 2024 be agreed as a correct record and signed by the Chair.

3b Minutes - February 2024

RESOLVED

That the minutes of the meeting held on 27 February 2024 be agreed as a correct record and signed by the Chair.

4 Energy Projects Update

The Committee received a presentation on energy projects in East Suffolk from the Cabinet Member with responsibility for Energy and Climate Change.

The Cabinet Member stated that projects were at various stages in development, and the Council engaged as and when appropriate. Even out of district proposals would impact residents and businesses in East Suffolk and meetings were being held on the ramifications of these.

The Cabinet Member provided an update on Lionlink which was currently in the preapplication stage. The EIA Scoping Report Consultation for this project had just closed and the Council had responded to this with a technical document and a summary letter to the Planning Inspectorate outlining the Council's comments and objection to the current proposal. The Council's response covered concerns around a discounting of offshore options and coordination with other projects.

The Cabinet Member provided an update on Sizewell C. Formal commencement occurred on 15 January 2024. Discharging of requirements was ongoing, and East Suffolk Council was working with Suffolk County Council, Environment Agency, Natural England and others on this. There were various forums around Sizewell C which the Council was engaging with. There were some issues with the format of the meetings, and with the works tracker, which the Council was raising with Sizewell C.

The Cabinet Member provided an update on the Offshore Coordination Support Scheme. The East Anglia study had concluded in March 2024. This assessed ten network configuration options to transfer power across the region. All of these options had used Friston as a key point, and the Cabinet Member had questioned why this was the case when the demand was further south.

The Cabinet Member a high level update on other projects; East Anglia One North, East Anglia Two, SeaLink and East Anglia Three.

The Chair invited questions.

Following a question on the involvement of the Council in the forums for Sizewell C, the Cabinet Member confirmed that the forums included representatives of the Council, but if any members representing affected areas wished to be more involved then they could be. The minutes of these meetings were available to see on the Council's website.

In response to a question on the Council's engagement on NSIPs with neighbouring authorities, the Cabinet Member agreed that the Council should be engaging with neighbouring councils so we could act together around these projects.

The Cabinet Member confirmed that the Council was continuing to push for coordination between energy projects at every opportunity, and continuing to engage with each project, and government about strategic coordination. The Government had been slow to support this, but incentives were now coming forward, including through the OCSS.

Following a question on funding arrangements for Sizewell C, the Cabinet Member stated that at present no Final Investment Decision had been reached, and the government had committed substantial funds to the project ahead of that point. Sizewell C Ltd were still seeking funding from other investors. There was still uncertainty around the funding.

The Cabinet Member, supported by the Head of Nationally Significant Infrastructure Planning, confirmed that the Sizewell C Annual Community Forum was primarily for invited representatives. The Head of Nationally Significant Infrastructure Planning noted that all minutes from forums could be found on East Suffolk Council's website.

Following a question from Councillor Ashdown on a recent research report by BGN that found that 49% of people would support hypothetical new transmission infrastructure in the local areas, the Cabinet Member stated he had not studied this report and so could not comment on this.

The Cabinet Member stated that East Suffolk Council had engaged with Town and Parish Councils prior to submitting their response to the SeaLink consultation, and that ward Councillors would continue to be engaged with regard to responses going forward.

The Cabinet Member received questions on Sizewell C traffic mitigation measures, Deed of Obligation commitments, worker healthcare provision, town and parish council representatives of transport forums, and the recent visit to Hinkley Point C.

In response to a question on transport associated with the Sizewell C project, the Cabinet Member noted that requests for lower speed limits and traffic calming measures had been requested by various parties for a long time. The Deed of Obligation meant that Sizewell C were charged with carrying out the development as consented and delivering certain commitments and roles, and any issues with this should be raised with them directly. The Cabinet Member stated he did have good contact with Sizewell C and could pass these on. The Cabinet Member also noted members of the public could visit the Sizewell C office to flag up issues directly to them.

Responding to a question about interconnectors and the village of Friston, the Cabinet Member stated that the first connection agreement had been given by National Grid to Scottish Power Renewables for the East Anglia One North and East Anglia Two projects. LionLink as a project was also looking at the proposed Friston substation to be included in their application for development consent, independent of any connection

agreement made with National Grid about the East Anglia One North and East Anglia Two projects. There was uncertainty at the minute. The Cabinet Member confirmed multiple projects were looking at connecting at Friston with associated infrastructure.

The Cabinet Member stated that the Council wanted a proper coordinated approach across the projects, using offshore connectors and brownfield sites as much as possible. The Cabinet Member noted this was set out in the recent motion to Full Council, seeking a properly considered offshore alternative, and stressing a preference for offshore coordination to seek brownfield landfalls. The initial agreement to use Friston was very opaque which is why there was so much confusion here. East Suffolk Council had written to the Secretary of State regarding offshore alternatives for LionLink and would continue to do so.

In response to a question about Bradwell and potential use for energy projects, the Cabinet Member stated that the alternative site at Bradwell had been proposed for a nuclear power station but various obstacles had been put forward. The Cabinet Member noted it had been said that if Bradwell was used for energy development, grid reinforcement would still be needed elsewhere.

In response to a question about the environmental impact of LionLink offshore verses onshore, the Cabinet Member stated that one of the reasons given by National Grid for not going fully offshore had been that the environmental impact offshore would be greater than onshore, but noted no comparative analysis had been done. The Head of Nationally Significant Infrastructure Planning noted this could be raised in dialogue with the Marine Management Organisation, the statutory body with primary responsibility for offshore environments.

5 Confirmation of the new Article 4 directions in the North Lowestoft and South Lowestoft/Kirkley Conservation Areas

The Committee received report **ES/1905** of Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management. Councillor Yule introduced the report and stated that consultation on the North Lowestoft and South Lowestoft/Kirkley Conservation Areas had now concluded. Consultees, including Lowestoft Town Council, had agreed that this should go forward and that the area should be protected. Councillor Yule emphasised that this applied to houses only, not commercial properties or flats. Some consultees had expressed concern around how this would impact renovations and whether costs would increase due to limits on the kind of materials that could be used. Issues around inconsistent planning enforcement had also been raised. Councillor Yule stated that by confirming these directions this would give officers the ability to be more consistent and robust.

The Chair invited questions.

Regarding window replacement specifically, Councillor Yule recognised that there had been a lot of concern about what this would mean. Officers stated that they had no information on authorities allowing U-PVC windows in conservation areas. Hardwood windows were longer lasting and it was difficult to replicate the look of historic windows with U-PVC. These directions did only cover the front of buildings and street scenes, so options for other windows could be considered on other parts of buildings.

There was a thorough historical supplementary planning document which provided guidance on issues like this.

Councillor Yule stated that the Council did not have the option to lower or remove fees for planning applications which would have previously been allowed in this area under permitted development rights. Officers stated that this used to be free, but had been changed. The Council would provide as much information as possible at pre-application stage for applications like this to help people make good applications. Councillor Yule noted the Committees concerns.

In response to a question regarding potential confusion on these rules applying only to residential housing, and what could be done to protect commercial buildings, Councillor Yule stated that the Council needed to take small steps toward this rather than taking a strong arm approach. Officers confirmed that photographs of these building would be taken and used as an internal database for planning officers, there would be data protection considerations but the team could consider how these could be shared as a historical record.

Councillor Yule moved the recommendations in the report which were seconded by Councillor Ashdown. There being no debate it was by a unanimous vote

RESOLVED

That the Strategic Planning Committee:

1. Agrees to confirm the new Article 4 directions in the North Lowestoft Conservation Area and the South Lowestoft/Kirkley Conservation Area, to take effect on 15th April 2024, on which date the existing Article 4 directions are cancelled and superseded.

6 Planning Performance Report - 1 October 2023 to 31 December 2023

The Committee received report **ES/1906** of Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management, which provided an update on the planning performance of the Development Management Team in terms of the timescales for determining planning applications.

The Principal Planner (Development Management, Technical Lead) stated that the Council was on target to achieve overall two year figure. The Interim Joint Head of Planning reminded the Committee that the government was consulting on an accelerated planning service which would speed up some parts of the application process, the Council would respond to this and would engage with Councillors through Cabinet Member with responsibility for Planning and Coastal Management.

There being no questions, Councillor Yule moved the recommendation in the report, which was seconded by Councillor Packard. The Chair invited the Committee to debate the proposals.

There being no debate it was by a unanimous vote

RESOLVED

That Strategic Planning Committee:-

That the report concerning the performance of the Development Management Team in terms of the speed of determining planning applications is noted.

7 Enforcement Performance Report - October to December 2023

The Committee received report **ES/1907** of Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management, which provided an update on the enforcement section of the Development Management Team.

The Chair invited questions.

Regarding timescales and delays in the enforcement process, Councillor Yule stated that the team were aware of the significant number of older cases to clear here. The Interim Head of Planning and Coastal Management stated that a report had previously been received on the Enforcement Improvement Action Plan and this was being worked through. An update on this would be presented to the June meeting of the Committee.

The Interim Joint Head of Planning updated the Committee on the Levelling Up and Regeneration Act enforcement – presentation had been given on this at the last committee. These changes had now progressed and would be coming into force from 25 April. This would include a change specifically for heritage matters on temporary stop notices, where previously they had only been for planning permission. The time period stop notices would be in force had also been increased from 28 to 56 days, which would allow more time to get situations under control. The four year period for residential building enforcement would also increase to ten years. A new enforcement warning notice was also being introduced which would allow the Council to served a notice where there had been a breach, but the applicant had been invited to submit a retrospective planning application. There were also changed to the appeal process, and appeals could be dismissed if there were delays from the appellant. Councillor Yule recognised that this was quite a lot of changes and asked if there could be a briefing on this for Councillors.

Following a question on how this related to process for the demolition of buildings, and the protection of buildings from demolition. The Interim Joint Head of Planning stated that there were no changes under this Act, but changes might come in the future. Councillor Yule stated it was important for residents to raise any issues relating to potential for demolition and the need to protect buildings as soon as possible so the Council could act.

The Interim Joint Head of Planning stated that if people did not apply for planning permission for retrospective developments when invited, the new enforcement warning notice would record that there was an unauthorised development but it was

likely to get consent. The extension of enforcement from four to ten years would also provide a further push for people to get consent for work.

Councillor Yule moved the recommendation in the report, which was seconded by Councillor Gee. The Chair invited the Committee to debate the proposals.

There being no debate it was by a unanimous vote

RESOLVED

That Strategic Planning Committee note the content of the report.

8 Appeal Performance Report - 8 December 2023 to 10 March 2024

The Committee received report **ES/1908** of Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management, which provided an update on the enforcement section of the Development Management Team.

Councillor Yule moved the recommendation in the report, which was seconded by Councillor Ninmey. There being no debate it was by a unanimous vote

RESOLVED

That Strategic Planning Committee note the report concerning the appeal performance of the team and the attached appendix containing summaries of appeal decisions.

9 Adoption of a new Local Validation List

The Committee received report ES/1909 of Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management.

Councillor Yule stated that most people would not have seen this information unless they had made a planning application. There were often comments on the lack of information in applications, and this slowed down the decision making process. The Local Validation List was a list of plans, assessments and documents required to be submitted as part of planning applications. By requiring these documents upfront, this would reduce the need to go back and forward on information when the clock started ticking on an application, and reduce the risk of challenge at validation stage. The Principal Planner stated that the number of appendices to this report seemed quite overwhelming, but that they would be in a more user friendly format when made available to the public.

The Principal Planner gave a presentation which summarised how the documents would work for members of the public accessing the list. The documents had been prepared to make it clearer for applicants and agents to understand what they needed to do, improve the quality of information submitted and make it easier for planning support to check applications to ensure all information had been provided upfront.

Councillor Yule thanked officers for their work on this, and the Parish, Town and District Councillors who had provided feedback on this document.

The Chair invited questions.

Councillor Hedgley stated he would like to see some simple guidance on the foul non mains drainage action. Other than this, the document was very thorough and he thanked officers for their work.

The Principal Planer stated that she had tested the document following the steps for a number of different applications. Information would be sent to the Committee when it was available publicly so they could try the system for themselves. Regarding town and parish council responses, there were not normally many responses on this type of consultation as it was a weighty subject. The Validation List had been discussed at the Town and Parish Council Forum and feedback had been gathered on the day.

The Principal Planner stated that the onus was always on applicants to ensure they had provided a correct application and if something was missing applicants were informed. The new format of the document did mean applicants could be directed to specific pages rather than a general document.

Councillor Yule moved the recommendations in the report which were seconded by Councillor Ewart. There being no debate it was by a unanimous vote

RESOLVED

That Strategic Planning Committee:

- 1. Approve that the ESC Local Validation List 2020 be superseded by the adoption of the Local Validation List 2024.
- 2. Authorise the Head of Planning and Coastal Management, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, to make any presentational or typographical amendments (including the insertion of the interconnecting hyperlinks) to the Local Validation List, the Local Validation Guidance and the associated Index prior to them being published as adopted documents.
- 3. Agree that the adoption date of the Local Validation List, associated Local Validation Guidance and associated Index be Wednesday 1 May 2024, to allow time without prejudging the committee's decision to format (including the insertion of the interconnecting hyperlinks) and publish the documents in their electronic interlinked online format.
- 4. Authorise the Head of Planning and Coastal Management to update any hyperlinks that break within the Local Validation List, Local Validation Guidance and associated Index, i.e. to replace the web addresses sitting behind the links to external websites and/or the ESC website, if/when the web addresses for those pages are changed.

10 Planning Policy and Delivery Update

The Committee received report **ES/1910** of Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management, which provided an update on the work programme, including the preparation of Supplementary Planning Documents and Neighbourhood Plans, and on housing delivery.

The Chair invited questions.

In response to a question on freeing up larger homes for families, Councillor Yule stated that this largely came under the Housing Portfolio. However local plans did seek to encourage smaller properties to be built which would encourage people to downsize.

Councillor Yule highlighted the section on CIL collection and spend. CIL delivery would be looked at in more detail soon. Councillor Yule also noted the risk concerning capacity.

In response to a question on the forthcoming consultation on the draft Kirkley waterfront planning position statement, the Interim Joint Head of Planning stated this was anticipated to begin in early June and run for four weeks to early July. The responses to the recent consultation would be reported back to the local plan working group in April.

Councillor Yule moved the recommendation in the report, which was seconded by Councillor Ashdown. There being no debate it was by a unanimous vote

RESOLVED

That Strategic Planning Committee note the content of the report.

The meeting concluded at 12.37pm
Chair



Committee	Strategic Planning Committee	
Date	08/07/2024	
Subject	Planning Policy and Delivery Update	
Cabinet Member	Councillor Kay Yule	
	Cabinet Member with responsibility for Planning and Coastal Management	
Report Author(s)	Andrea McMillan	
	Planning Manager (Policy, Delivery and Specialist Services)	
	Andrea.mcmillan@eastsuffolk.gov.uk	
Head of Service	Ben Woolnough	
	Head of Planning, Building Control and Coastal Management	
	Ben.woolnough@eastsuffolk.gov.uk	
Director	Nick Khan	
	Strategic Director	
	Nick.khan@eastsuffolk.gov.uk	

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	Not applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

This report provides an update on key elements of the current work programme, including the preparation of Supplementary Planning Documents and Neighbourhood Plans, and on housing delivery.

Updates, as appropriate, are also included for the Specialist Services team, which comprises Design and Heritage, Ecology, Arboriculture and Landscape, and Rights of Way. An update is also provided on the delivery of infrastructure to support growth through the Community Infrastructure Levy (CIL).

Recommendation(s)

That Strategic Planning Committee note the content of the report.

Strategic plan		
How does this proposal support Our Direction 2028?		
Environmental Impact	The work programme relates to a number of the aims under the Environmental Impact theme. The adoption of the Healthy Environments Supplementary Planning Document will support sustainable transport, alongside the implementation of the East Suffolk Cycling and Walking Strategy. Work to prepare for and implement Biodiversity Net Gain will further the aim of restoring ecosystems and biodiversity. The work programme of the Design and Heritage team will directly contribute to preserving and maintaining the district's beauty and heritage.	
Sustainable Housing	The work programme supports the delivery of the Council's Local Plans which set out a strategy to deliver housing needed. Neighbourhood Plans also support this aim, in particular where they include policies on housing or allocate sites for housing. The preparation of the Developer Charter provides an opportunity to further promote housing developments which enhance wellbeing and protect the environment.	
Tackling Inequalities	The adoption of the Healthy Environments Supplementary Planning Document supports this theme, through providing guidance on supporting health and wellbeing through new development.	
Thriving Economy	The work programme supports the aim of ensuring Local Plans work for local people, including through the provision of guidance to support the implementation of the current Local Plans and supporting communities to prepare their own Neighbourhood Plans. The work on the Kirkley Waterfront Planning Position Statement will help to guide decisions on the planning applications for the site, and the redevelopment of the site will help to support the viability and vitality of Lowestoft. The Employment Land Action Plan will also support the Thriving Economy theme.	
Our Foundations / governance of the organisation	'Our Foundations' refer to the use of digital technology. Information on many of the items covered in this update report is available on the Council's website. As an example the Planning Delivery Dashboard contains information on housing delivery and other planning data in an interactive format, and the	

Infrastructure Team have recently published a short video on
CIL spending.

Justification for recommendations

1. Background

- 1.1. This report provides an update on the current Planning Policy and Delivery work programme, which continues to focus on the delivery of the Council's adopted Local Plans the Suffolk Coastal Local Plan (September 2020) and the Waveney Local Plan (March 2019).
- 1.2. The current work programme contains a number of projects to support the delivery of the Local Plans, including providing guidance to support the implementation of planning policies through the preparation of Supplementary Planning Documents (SPDs) and monitoring the implementation of the plans.
- 1.3. The Specialist Services Team, which comprises the Design and Heritage, Ecology, and Landscape and Arboriculture (including Public Rights of Way) services, is continuing to provide ongoing expert input across the Planning Service including in respect of development management, Nationally Significant Infrastructure Projects and planning policy, as well as on wider Council projects. The Design and Heritage service has a programme of projects including Conservation Area Appraisal and Management Plan reviews and the review of Article 4 directions in Conservation Areas.
- 1.4. The updates in this report focus on projects and include the progress being made on the preparation of Supplementary Planning Documents and Neighbourhood Plans, as well as projects in the Design and Heritage Team and in relation to Biodiversity Net Gain. An update is also provided on housing delivery towards meeting the requirements set out in the adopted Local Plans.
- 1.5. An update on the work of the Infrastructure Team relating to the collection and spend of the Community Infrastructure Levy and Section 106 monies is also provided in this report.

2. Introduction

2.1. This report provides an update on key milestones achieved over the past three to four months since the last update report to Strategic Planning Committee and also sets out the key project milestones over the next three months or so.

Key milestones achieved over the past three to four months

Neighbourhood Plans

- 2.2. Recent progress on <u>Neighbourhood Plans</u>:
 - Carlton Colville Neighbourhood Plan Examiner's report received 15th January 2024, with consideration being given to the Examiner's recommendations
 - Easton Neighbourhood Plan Examiner's report received 22nd March 2024, and East Suffolk Council Decision Statement published on 29th April 2024. Referendum

held on 13th June, with 90.7% of those who voted voting in favour of the Neighbourhood Plan.

- Playford Neighbourhood Plan Examiner's report received on 4th March 2024, and East Suffolk Council Decision Statement published on 9th April 2024. Referendum held on 13th June, with 79.2% of those who voted voting in favour of the Neighbourhood Plan.
- Lowestoft Neighbourhood Plan Following the second Regulation 14 consultation undertaken between 30th October and 11th December 2023, progress is being made towards Submission.
- Westerfield Neighbourhood Plan Following the Regulation 14 consultation undertaken between 25th November 2023 and 19th January 2024, progress is being made towards Submission.
- Otley Neighbourhood Plan Regulation 14 consultation concluded on 15th April 2024.
- **Ufford** Neighbourhood Plan Regulation 14 consultation began on 14th March 2024 and ran until 3rd May 2024.
- Saxmundham Town Council applied to review their Neighbourhood Plan area, with a consultation held between 23rd February and 5th April 2024. The revised Neighbourhood Area designation, which reflects the Parish Council boundary as amended in April 2023, was approved by East Suffolk Council on 30th April 2024.
- Preparation of Neighbourhood Planning housing guidance is underway.

Supplementary Planning Documents

- 2.3. Recent progress on preparation of <u>Supplementary Planning Documents</u>:
 - The Rural Development Supplementary Planning Document was adopted on 9th April 2024.
 - The Custom and Self Build Housing Supplementary Planning Document, was adopted on 7th May 2024.
 - The Healthy Environments Supplementary Planning Document was adopted on 4th
 June 2024.

A total of 11 Supplementary Planning Documents have now been adopted since the Local Plans were adopted, providing important guidance to support the implementation of the Council's two Local Plans.

<u>Kirkley Waterfront Planning Position Statement</u>

2.4. Work has continued on reviewing guidance for the Kirkley Waterfront and Sustainable Urban Neighbourhood. Under the reforms to the planning system introduced through the Levelling Up and Regeneration Act 2023, it is unlikely that new Supplementary Planning Documents will be able to be adopted once the relevant parts of the Act are commenced. Therefore, and in order to provide timely guidance, a <u>Planning Position Statement</u> is being prepared for the site, which will provide updated guidance alongside the existing 2013 Supplementary Planning Document. An Initial Consultation took place

between 6th March and 3rd April 2024, seeking views on what should be included in the Planning Position Statement. Following that, and taking into account the comments received, work has progressed on drafting the Planning Position Statement, which will be published for consultation in the Summer.

Design and Heritage

- 2.5. Recent progress on <u>Design and Heritage projects</u>:
 - Consultants are undertaking fieldwork in relation to the review of the **Halesworth** Conservation Area Appraisal and Management Plan.
 - Proposals relating to the cancellation of the existing Article 4 directions in North
 Lowestoft Conservation Area and South Lowestoft and Kirkley Conservation Area
 and confirmation of new ones were confirmed by Strategic Planning Committee on
 8th April, and came into effect on 15th April 2024.
 - Consultants' fieldwork in support of the ongoing review of the other existing Article 4 directions in place in the Waveney area, plus a pilot in the Suffolk Coastal area, taking account of changes in the 2021 National Planning Policy Framework (NPPF) on their use, has been completed. The year 1 review covers Southwold, Wangford and Homersfield in the former Waveney area, and a pilot in Marlesford in the former Suffolk Coastal area. A report is being brought to Strategic Planning Committee on 8th July to make the new directions, following which they will be subject to public consultation.
 - Nominations are open until 26th July 2024 for the 2024 <u>Quality of Place Awards</u>. The six categories are: Design New Build; Design Extensions and Alterations; Building Conservation; Community; Landscape; Nature/Ecology.

Biodiversity Net Gain

2.6. Mandatory Biodiversity Net Gain came into force on 12th February 2024 for major developments, and for smaller developments from 2nd April (some categories of development are exempt). Recruitment of an Ecologist and Assistant Ecologist took place in advance of the requirements coming in, as part of preparation. The Council is also engaging with other authorities in Suffolk on the preparation of the Local Nature Recovery Strategy.

Housing Delivery

2.7. Housing growth planned for in the Local Plans has continued to come forward, with many sites either under construction, consented, subject to planning applications or subject to early discussion with the Planning Service. The annual housing requirement figure for East Suffolk is 916 dwellings, based on the figures in the two adopted Local Plans for the District. For the year 2023/24, 860 dwellings were delivered, 275 of which were for affordable housing (provisional figures). Whilst this figure is below the requirement of 916, it is an increase on recent years. As at 31st March 2024 1,229 dwellings were under construction compared to 1,223 at the same point in the previous year, therefore a very similar number. Of those under construction 252 are affordable homes. We saw a decrease in the number of dwellings starting post June 2023, which is understood to coincide with changes to Building Regulations in June 2023, however this has risen in recent months with 249 starts in Q4 of 2023/24.

2.8. The 2023 update to the <u>Housing Action Plan</u> was published in April 2024, following the publication of the 2022 Housing Delivery Test in December 2023.

CIL collection and spend

- 2.9. Updates for the past three to four months:
 - £7,195,247.89 total CIL was collected by the Infrastructure Team in the last financial year (1 April 2023 31 March 2024). This is slightly higher than in previous years in part because of the increased CIL Rates, the New East Suffolk CIL Instalment Policy, and indexation of historic rates (as applicable). The current position of CIL can always be viewed on the Council's developer contributions dashboard:

 East Suffolk PFM Home (exacom.co.uk)
 - Neighbourhood CIL (NCIL) allocations of £472,654.25 were recently made to the Town and Parish Councils before the deadline of 28 April 2024. Parish Councils receiving NCIL must annually report on their use of the CIL via their webpages and they must also spend the NCIL they receive on delivering local infrastructure priorities within 5 years of the date of receipt of the CIL.
 - A number of Councils are still reporting back to us (or on their websites) using either out of date templates or are not reporting the required information. Errors within reports have also been identified. In some instances spend does not correlate well with Neighbourhood Plan priorities. Officers have provided regular training (including bespoke training in evening sessions), downloadable (compliant) report templates, written guidance and a dedicated Parish CIL webpage and are also available for support and questions.
 - Recently local authorities were designated as Building Safety Levy (BSL) Collection Authorities, this means that as well as collecting CIL the Infrastructure Team will soon collect and report on BSL. It is still expected that this is to be implemented by year end. From a recent DLUHC Technical Consultation, it is noted that the collection processes are similar to those of CIL, although proposed reporting requirements differ, and it is not currently proposed that BSL Reporting will be part of the Infrastructure Funding Statement (the statutory report on Developer Contributions). Pilot work is currently underway to develop our back office systems in readiness for BS Levy collection, although we await further guidance to be issued by the post-election government.
 - Activity in the Infrastructure Team is also focussed on working on CIL Spending, the financial year end reports and the activities required to produce statutory reports for internal verification processes.
 - This year, the Infrastructure Team received the highest number of individual bids for District CIL and Local CIL funding – 21 in total.
 - A short <u>video</u> on CIL spending in East Suffolk was published and promoted in April.

Key project milestones over the next three to four months

Neighbourhood Plans

2.10. Progress with <u>Neighbourhood Plans</u> over the next three to four months:

- **Carlton Colville** Neighbourhood Plan Progress to be made towards issuing the Decision Statement, and subsequently toward referendum.
- Playford Neighbourhood Plan The referendum was held on 13th June, and following a positive outcome the plan will be taken to full Council in July to be 'made'.
- **Easton** Neighbourhood Plan The referendum was held on 13th June, and following a positive outcome the plan will be taken to full Council in July to be 'made'.
- Lowestoft Neighbourhood Plan Progress to be made towards Submission
- Westerfield Neighbourhood Plan Progress to be made towards Submission
- Otley Neighbourhood Plan Progress to be made towards Submission
- **Ufford** Neighbourhood Plan Progress to be made towards Submission
- 2.11. Guidance for Neighbourhood Plan groups on delivering new housing through their plans will be progressed with consultation anticipated later in the Summer.

Kirkley Waterfront Planning Position Statement

2.12. The draft Planning Position Statement will be prepared in advance of public consultation taking place in Summer 2024.

Authority Monitoring Report

2.13. Monitoring and survey work will continue, to inform the 2023/24 Authority Monitoring Report which will subsequently be prepared in the Autumn for publication in January 2025. Work will also progress on the annual update of the Housing Land Supply Statement.

Design and Heritage

- 2.14. Progress with <u>Design and Heritage projects</u> over the next three to four months:
 - Work on the Halesworth Conservation Area draft appraisal and boundary review will continue. It is expected that the review will take place during 2024 with consultation in early 2025.
 - The Article 4 review being rolled out across other Conservation Areas in the former Waveney area will continue (Southwold, Wangford and Homersfield), along with the pilot in Marlesford in the former Suffolk Coastal area. Subject to a decision by Strategic Planning Committee at their meeting on 8th July, consultation will take place on the proposed review. Year 2 of the review will include the Conservation Areas in Beccles, Holton, Wissett, Thorpeness and Walberswick and fieldwork will be commencing in the summer of 2024.
 - Nominations for the <u>2024 Quality of Place Awards</u> will close on 26th July 2024.
 Shortlisting will then take place, with an Awards Ceremony to take place later in the year.
 - An internal review of the Historic Building Grants scheme is underway.

• Proposals for the review and re-appraisal of three existing Conservation Areas are being prepared as part of a rolling programme. Conservation Areas with the oldest appraisals will be considered as a priority.

Biodiversity Net Gain

2.15. Ongoing implementation of Biodiversity Net Gain will continue and guidance will be made available as needed. The Council will also continue to engage with other authorities across Suffolk on the preparation of the Local Nature Recovery Strategy.

Developer Charter

2.16. Preparation of a Developer Charter is underway. Whilst not policy or a part of the development plan, this will act as a tool to promote and recognise developments that are more ambitious in terms of factors such as environmental performance, as well as setting out the Council's expectations in relation to engagement and consultation, complementing the Statement of Community Involvement. We will engage with Town and Parish Councils and with major developers to inform the Charter. It is anticipated that the Charter will be adopted by Cabinet in the Autumn.

Employment Land Action Plan

2.17. Similar to the Housing Action Plan prepared every year, work is underway on an Employment Land Action Plan, which will investigate the current position on employment allocations in the district and identify any suitable actions where feasible.

Houses in Multiple Occupation

2.18. Work is progressing on the provision of guidance on 'exceptional circumstances' (Waveney Local Plan policy WLP8.4) in relation to the granting of consent for conversion to Houses in Multiple Occupation, which is anticipated to be adopted in the Autumn following consultation. This will act alongside the Supplementary Housing Statement, prepared by the Housing service, approved by Cabinet in June. Work is also progressing on reviewing the current Article 4 Direction for Houses in Multiple Occupation that exists across the former Waveney district.

Future Local Plan

2.19. The Local Development Scheme, adopted in March 2024, sets out an indicative timescale for a future East Suffolk Local Plan, subject to review pending further legislation and details of the reforms to plan-making. However in the meantime Local Plan Working Group will provide a forum to give early consideration to Members' aspirations and considerations for a future Local Plan. This will take place over the Autumn and Winter, with an opportunity also to be provided for all Councillors to input their views, prior to beginning any formal stages of Local Plan preparation.

Cycling, Walking and Wheeling

2.20. The Council has established a Cycling, Walking and Wheeling Working Group, to take forward the implementation of the <u>East Suffolk Cycling and Walking Strategy</u> which was adopted in October 2022. The Working Group is identifying a small number of trial projects initially, to build up an approach to taking enhancements forward, alongside securing improvements through the determination of planning applications for development.

Housing Delivery

2.21. As stated in paragraph 2.7 above, there were 1,229 dwellings under construction as at 31st March 2024, around the same number as at the same time in the previous year. Over the coming months, the Planning Service will continue to support the delivery of housing set out in the Local Plans, including through the determination of planning applications and through ongoing support for bringing forward strategic sites such as supporting master-planning and through the preparation of the Planning Position Statement for the Kirkley Waterfront.

CIL Collection and Spend

- 2.22. Progress over the next three to four months:
 - The CIL Spending Working Group have begun their programme of meetings to review the CIL bids received and to make relevant recommendations in advance of Cabinet decisions on the bids.
 - As we move forwards, with a large number of high value critical and essential
 infrastructure projects in the pipeline, the CIL Spending Working Group are
 considering the ways in which affordability from the District CIL pot can be
 managed in order to avoid the need to delay capital funding for projects or borrow,
 where these projects are planned for in the short term.
 - Updates to the Infrastructure List, part of the Infrastructure Funding Statement, are in progress.
 - The CIL Spending Strategy and updated Infrastructure Funding Statement will be taken to Cabinet in September, alongside the CIL bids.

National update

- 2.23. The Levelling Up and Regeneration Act received Royal Assent in October 2023. The Act introduces a number of changes, including changes to the preparation of Local Plans; a requirement on authorities to prepare a design code; the introduction of National Development Management Policies; new Supplementary Plans; provision for Neighbourhood Priorities Statements to be prepared by communities; the introduction of Environmental Outcomes Reports and the introduction of Infrastructure Levy. Secondary legislation to take forward the provisions of the Act is anticipated during 2024.
- 2.24. Some consultation on areas of detail has already taken place by the Government, including a consultation on <u>plan-making reforms</u> held between July and October 2023, consultations on <u>Environmental Outcomes Reports</u> and <u>Infrastructure Levy</u> earlier in 2023, and consultation on <u>Street Vote development orders</u> between December 2023 and February 2024. Consultation was also recently held on the <u>Accelerated planning system</u> between March and May 2024.

3. Proposal

3.1. Areas of work underway are outlined above and it is proposed that Strategic Planning Committee note the contents of the report.

4. Financial Implications

4.1. The work of the Team is undertaken within existing budgets, with grant income generated through support provided on Neighbourhood Planning. Grant funding is also provided from Defra in relation to Biodiversity Net Gain.

5. Legal Implications

5.1. All work outlined above is undertaken in accordance with relevant legal requirements where they exist. There are no legal impacts arising from this update report.

6. Risk Implications

6.1. The work programme of the Team is significant and crucial to the delivery of many aspects of the Strategic Plan. Staff capacity is an ongoing risk.

7. Options

7.1. This report is for information only.

8. Recommendations

8.1. That Strategic Planning Committee note the contents of the report.

9. Reasons for Recommendations

9.1. This report is for information only.

10. Conclusions/Next Steps

10.1. The areas of work outlined above will take place over the next three to four months, and a further update will be brought to the next scheduled Strategic Planning Committee meeting, in October.

Areas of consideration comments

Section 151 Officer comments:

The Section 151 Officer has received a copy of the report and has no further comments

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

The report is for information only

Safeguarding:

The report is for information only

Crime and Disorder:

The report is for information only

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

The report is for information only

Residents and Businesses consultation/consideration:

The report is for information only

Appendices:

None.

Background reference papers:		
Date	Туре	Available From
2019	East Suffolk Council – Waveney	Adopted-Waveney-Local-Plan-
	Local Plan	including-Erratum.pdf
		(eastsuffolk.gov.uk)
2020	East Suffolk Council – Suffolk Coastal	East-Suffolk-Council-Suffolk-Coastal-
	Local Plan	Local-Plan.pdf (eastsuffolk.gov.uk)
Various	Neighbourhood Plans	Neighbourhood Plans in the area »
		East Suffolk Council
Various	Supplementary Planning Documents	Supplementary Planning Documents
		and other guidance » East Suffolk
		Council
2024	East Suffolk Local Development	<u>Local-Development-Scheme-March-</u>
	Scheme	2024.pdf (eastsuffolk.gov.uk)
2024	Authority Monitoring Report	Open data, monitoring and housing
		supply » East Suffolk Council
Various	Conservation Area Appraisals and	Conservation area appraisals » East
	Management Plans	Suffolk Council
2023	East Suffolk Housing Land Supply	Housing Land Supply » East Suffolk
	Statements	<u>Council</u>
Various	East Suffolk Housing Action Plans	Housing Action Plan » East Suffolk
		Council



Strategic Planning Committee
08/07/2024
Making of new Article 4 directions in Southwold, Wangford, Homersfield, Marlesford and Walberswick Quay
Councillor Kay Yule
Cabinet Member with responsibility for Planning and Coastal Management
Eloise Limmer
Senior Design and Heritage Officer
eloise.limmer@eastsuffolk.gov.uk
Ben Woolnough
Head of Planning, Building Control and Coastal Management
Ben.woolnough@eastsuffolk.gov.uk
Nick Khan
Strategic Director
Nick.khan@eastsuffolk.gov.uk

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	Not applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

To agree the making of new Article 4 directions in the Conservation Areas in Southwold, Wangford and Homersfield covering amended areas, which are to replace the existing Article 4 directions.

To agree the making of a new Article 4 direction in the Marlesford Conservation Area where no such direction currently exists.

To agree the making of a new Article 4 direction in the Walberswick Quay area of the Walberswick Conservation Area to ensure that this area is still protected following the removal of the Southwold Harbour and Walberswick Quay Conservation Area and the changes to the Southwold Article 4 direction.

The proposed new Article 4 directions will not come into effect until such time as they are confirmed by a future meeting of this Committee (following public consultation), in the meantime, where relevant, the existing Article 4 directions will remain in place.

Recommendation(s)

That Strategic Planning Committee:

- Agrees the making of new Article 4 directions in the Southwold, Homersfield, Wangford Conservation Areas and the Walberswick Quay area of the Walberswick Conservation Area, covering amended areas shown on the maps attached and including those properties and land included in the schedule attached at Appendices A-D
- Agrees the making of a new Article 4 direction in Marlesford, where there is currently no such direction in place, covering the area shown on the map attached including those properties and land included in the schedule attached at Appendix E.
- 3. Agrees that the statutory public consultation period is to start on July 15th 2024 and conclude on August 26th 2024 to collect public representations including from members of the public affected by the proposed changes.
- 4. Agrees that, following the statutory public consultation period, the new Article 4 directions will be presented to the Strategic Planning Committee at its meeting on October 7th 2024 to consider their confirmation on October 14th 2024.
- Agrees that the Head of Planning, Building Control and Coastal Management, in consultation with the Cabinet member with responsibility for Planning and Coastal Management, is authorised to make any presentational or typographical amendments to the Article 4 directions and accompanying maps, prior to the public consultation period.

Strategic plan How does this proposal support Our Direction 2028?		
Environmental Impact	Preserving the district's beauty and heritage by aiding the preservation and enhancement of the Southwold, Wangford, Homersfield, Marlesford and Walberswick Conservation Areas.	
Sustainable Housing	Promoting community pride in homes and neighbourhoods by preserving the historic character of these settlements.	

Tackling Inequalities	Not applicable.
Thriving Economy	Supporting responsible tourism and visitor economy by preserving the District's heritage.
Our Foundations / governance of the organisation	Engaging with residents on changes to planning regulations that would affect them.

Justification for recommendations

1. Background

- 1.1. The Design and Heritage Team are undertaking a review of the Article 4 directions on Conservation Areas in the District. The existing Article 4 directions were put in place in 2008 by the former Waveney District Council and are blanket in nature, covering all properties within the Conservation Areas, regardless of their status, use or merit. There are currently no Article 4 directions in place on any Conservation Areas in the former Suffolk Coastal District Council area.
- 1.2. Article 4 directions are made under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 ("GPDO").
- 1.3. Under the existing Article 4 directions, any
 - alterations to elevations or roofs in a relevant location (fronting a highway, open space or waterway),
 - construction of a porch,
 - provision of enclosure within the grounds fronting a relevant location,
 - hard surfacing within the grounds fronting a relevant location,
 - installation of a satellite antenna,
 - alteration of a chimney,
 - alteration or demolition of a fence or boundary wall fronting a relevant location,
 - painting of an elevation in a relevant location,

requires planning permission. This allows the Local Planning Authority to assess these proposals to minimise the loss of appropriate features or historic character, and/or control the installation of new features.

- 1.4. Following a successful pilot project in the North Lowestoft Conservation Area and the South Lowestoft and Kirkley Conservation Area the Design and Heritage Team is continuing with a three-year project to review all the existing Article 4 directions as well as considering the introduction of new Article 4 directions in the former Suffolk Coastal area.
- 1.5. 2023/24 is the first year of that project. The existing Article 4 directions in Southwold, Wangford and Homersfield Conservation Areas and the Walberswick Quay part of Walberswick Conservation Area were reviewed. A new Article 4 direction in the Marlesford Conservation Area is also proposed, where no such direction currently exists.
- 1.6. The Design and Heritage Team are reviewing the existing Article 4 directions so that they can be updated in terms of the most recent amendments (2015) to the General Permitted Development Order, and Government policy provided within the latest National Planning Policy Framework ("NPPF") (Dec. 2023). Para 53 of the NPPF states that "The use of Article 4 directions to remove national permitted development rights should (...) in all cases, be based on robust evidence, and apply to the smallest geographical area possible."

- 1.7. In order to meet these requirements, condition surveys of the Conservation Areas were undertaken to serve as the robust evidence base for the review of the Article 4 directions, as required by the NPPF. The condition surveys focused on properties that have been identified in the Conservation Area Appraisals as positive unlisted buildings in the Conservation Areas. The Conservation Area Appraisals identify these buildings that are not protected by statutory listing but are considered to make a positive contribution to the character or appearance of the Conservation Area.
- 1.8. It was not considered necessary to survey:
 - Listed buildings; because these properties already have restricted permitted development rights.
 - Buildings that are not listed or positive unlisted; because these properties are not considered to have notable architectural or historic features that merit the protection of Article 4 directions.
- 1.9. Properties were surveyed with reference to the features that an Article 4 direction can control change to. The relevant properties were assessed using the following criteria:
 - 'Appropriate' (i.e. historic or modern with traditional details and materials) windows and doors
 - Altered or unaltered roof
 - Painted or unpainted façade
 - Intact front boundary
 - Hardstanding in front garden
 - Presence of chimneys
 - Presence of non-historic porches
- 1.10. Properties were largely surveyed in groups, for example terraces, as these groups have similar characteristics whose intactness contributes to their collective value. This is also to avoid individual properties within a group having varying levels of protection.
- 1.11. The results of the surveys were presented in map form, using a colour coding system, to show areas where loss of historic features/installation of inappropriate features has occurred. (Mapping PDFs in Appendix F)
- 1.12. The proposals were presented to Local Plan Working Group on May 29th 2024.

2. Introduction

- 2.1. Based on the robust evidence of the condition surveys, in addition to consultations with the Development Management Team and the Enforcement Team, the Design and Heritage Team has prepared new Article 4 directions.
- 2.2. This report will provide a summary of the following:
 - The reasoning and justification for the amendment of the geographical areas covered by the existing Article 4 directions in Southwold, Wangford and Homersfield;
 - The reasoning and justification for the amendment to the existing Article 4 direction covering the Walberswick Quay area of the Walberswick Conservation Area;
 - The reasoning and justification for the introduction of a new Article 4 direction in Marlesford;
 - The reasoning for the amendments to the content of the Article 4 directions;

- Consequences of the proposals;
- National and local planning policies; and
- The statutory requirements for the creation of new Article 4 directions.

3. Proposal

3.1. That the Strategic Planning Committee makes new Article 4 directions in Southwold, Wangford, Homersfield, Walberswick Quay and Marlesford. This will trigger a period of public consultation. However, the new Article 4 directions will not come into effect until confirmed by Strategic Planning Committee at their next meeting.

Amendments to the existing Article 4 directions in Wangford and Homersfield

- 3.2. Overall, the condition of the properties in the Wangford and Homersfield Conservation Areas was found to be very good with high retention of historic features. This demonstrates the effectiveness of the existing Article 4 directions. However, in line with the guidance that the directions should cover the smallest geographic area possible, reductions to the extent of the area covered by the Article 4 directions are still proposed for the following reasons:
 - Listed buildings have restricted permitted development rights, and therefore the additional Article 4 direction on these properties is unnecessary.
 - Buildings that are not identified as 'positive unlisted buildings' are not considered to have notable historic features that merit the protection of Article 4 directions.
 - Article 4 directions only apply to dwellinghouses and, therefore, they have no effect over areas of landscape or non-domestic buildings.

Amendments to the existing Article 4 directions in Southwold

- 3.3. Southwold is a town densely packed with historic buildings. This is demonstrated by the fact that the majority of the buildings within the Conservation Area are either listed or identified as positive unlisted buildings in the Conservation Area Appraisal. The Conservation Area boundary is, for the most part, tightly drawn around the built-up area of the town other than the area to the south which incorporates the beach and the harbour.
- 3.4. The proposal for Southwold does not therefore propose a reduction in the Article 4 direction area. The centre of the town contains the High Street which is dominated by retail properties where the Article 4 direction is not relevant. However, for the sake of a simple, clear boundary it is not proposed to remove these buildings from the Article 4 direction area. This allows the boundary to be clear and legible on the ground, bounding the built-up area of the town.
- 3.5. The Southwold Conservation Area was extended in January 2024. The extension areas are not currently covered by an Article 4 direction. The proposal is to include the dwellinghouses in these areas within the new Article 4 direction. The exception is the early council housing to the north-west of the Conservation Area. These buildings were included in the Conservation Area as they tell an important story of the historic development of the town. However, they do not retain any features that would be protected by the Article 4 directions and therefore are not proposed for inclusion.

3.6. The row of houses that face the beach along Ferry Road to the south of the town are also not proposed for inclusion. They are an eclectic mix of architectural styles. However, they do not retain features that would benefit from protection with an Article 4 direction. The landscape of the beach and along the harbour would not be impacted by an Article 4 direction, nor would the fishing huts along the harbour and, therefore, these areas are not proposed for inclusion. The row of dwellings to the north-west of the harbour is proposed for inclusion as they are historic and make an important contribution to the character of this area, with both their front and rear elevations facing 'relevant locations'.

Amendments to the existing Article 4 directions in Walberswick Quay

- 3.7. Walberswick Quay is now part of the Walberswick Conservation Area following changes made in January 2024. It was formerly part of a now defunct Conservation Area called Southwold Harbour and Walberswick Quay. The Southwold Harbour area was added to the Southwold Conservation Area and the Walberswick Quay area was added to the Walberswick Conservation Area.
- 3.8. When the existing Article 4 directions were confirmed in 2008, Walberswick Quay and Southwold Harbour Conservation Area still existed and a blanket direction was made over that area which remains in place today despite the changes to the Conservation Areas. The Southwold Harbour area has been assessed as part of the Southwold Article 4 direction review and therefore the direction on this area will be replaced with the new Southwold Article 4 direction.
- 3.9. The wider Walberswick Conservation Area does not currently have an Article 4 direction in place. It will be assessed for an Article 4 direction in year two of this project.

 Therefore, a decision had to be made whether to create a new Article 4 direction just on the Walberswick Quay area or to let the protection lapse until the wider Conservation Area is reviewed in year two. It has been decided that the character of Walberswick Quay is vulnerable to change and therefore the protection that an Article 4 direction provides should not be allowed to lapse, even for a short period of time.
- 3.10. The nature of the Walberswick Quay area is different from the other areas that have been reviewed. The dwellinghouses sit in the centre of the area surrounded by open space, and therefore face 'relevant locations' on all sides. It is also difficult to determine the extent of the property boundaries of these dwellings which makes it hard to draw a definitive boundary line. For these reasons it has been decided to keep an Article 4 direction in place across the whole area in this case.

New Article 4 direction in Marlesford

3.11. There is no existing Article 4 direction in Marlesford, therefore this is the first Conservation Area where a completely new Article 4 direction is proposed. The Design and Heritage Team have received multiple requests from Marlesford Parish Council over the last few years to assess the Conservation Area for an Article 4 direction. It is considered important that there should be strong public support for the introduction of any new Article 4 directions, and the significant interest of the Parish Council is an important indicator of this in Marlesford. The response from the wider village in the public consultation will be important in understanding the public support for this proposed new Article 4 direction.

3.12. The Marlesford Conservation Area Appraisal (2014) states that:

The particular character of Marlesford, with its strong prevailing historic appearance, renders it particularly sensitive to the cumulative loss or alteration of key features that contribute to the character and appearance of the conservation area. Such features include windows, doors, front boundaries, chimneys, and roof coverings. Whereas some conservation areas can benefit from the enhancement of their mixed character, others will be slowly degraded over time through the exercise of permitted development rights. It is proposed, therefore, that a survey be undertaken to identify the extent of existing harmful change and that an Article 4(2) Direction be considered for making in the conservation area.

Amendments to the content of the Article 4 directions

- 3.13. The text of the Article 4 direction will be amended to reflect the changes to the General Permitted Development Order (GPDO) since 2008.
 - The Article 4 directions are now made under Article 4(1), rather than Article 4(2) of the GPDO (2015).
 - Some changes have been made to the Parts and Classes of the GPDO (2015). The new directions have been amended to reflect these.
 - The restriction on the installation of satellite dishes in certain controlled locations is proposed for removal, as this is becoming outdated technology.
 - The restriction on painting the exterior of buildings in certain locations is removed. The GPDO does not distinguish between the painting of previously unpainted surfaces and the general painting of the exterior of a building. Therefore, it is considered that the removal of the Permitted Development right to paint the exterior of a building would be too onerous and could result in a large number of applications where there would be no change to the character or appearance of the building as well as likely compliance issues.
 - Consideration was given to restricting renewable energy under Part 14 of the GPDO
 (concerning the installation of solar equipment, heat pumps and biomass heating
 systems) and electrical outlets and upstands for recharging vehicles under Part 2
 Class D and E. Following consultation with the Local Plan Working Group it was
 decided that these should not be restricted.

National and local planning policies

- 3.14. The NPPF states in para. 53 that: "The use of Article 4 directions to remove national permitted development rights should: in all cases, be based on robust evidence, and apply to the smallest geographical area possible."
- 3.15. Policy WLP8.39 Conservation Areas of the Waveney Local Plan states that "Proposals for replacement doors, windows and porches in conservation areas where Article 4 directions are in place must be of a suitable design and constructed in appropriate materials. Applications will be assessed with reference to the prominence of the location, the historic and architectural value of the building and the historic and architectural value of the feature to be replaced."
- 3.16. The background text of Policy SCLP11.5 Conservation Areas in the Suffolk Coastal Local Plan states that 'There are no Article 4 directions in former Suffolk Coastal Area'. There

is no policy reference to Article 4 directions in the Suffolk Coastal Local Plan however Policy SCLP11.5 Conservation Areas states "Developments should be of a particularly high standard of design and high quality of materials in order to preserve or enhance the character or appearance of the area" which will help to guide decision making on applications that result from Article 4 directions until such time as a new Local Plan is prepared.

3.17. There is clear guidance on works that are appropriate in Conservation Areas within East Suffolk's Historic Environment Supplementary Planning Document (2021) which will also guide decision making.

Statutory requirements for the creation of Article 4 directions

- 3.18. Should the report recommendations be agreed, the statutory procedure will be as follows:
 - On Monday July 15th, a notice containing the Article 4 directions and relevant maps will be served by local advertisement, by two site notices in heavily trafficked public areas, and by letter to all property owners and occupiers in the affected areas.
 - The exception is Southwold where letters will <u>not</u> be sent to all owner/occupiers. This is due to the very large number of properties within the Article 4 direction area and the fact that, for most, the proposed changes will be very minor with only the content of the direction changing (see paragraph 3.13 above). The GPDO states that "the local planning authority need not serve notice on an owner or occupier... if they consider that the number of owners or occupiers within the area to which the direction relates makes individual service impracticable'. All owner/occupiers of dwellinghouses that are currently not covered by an Article 4 direction, but that will be brought into the amended Article 4 direction area, will be sent a letter.
 - The consultation period will run from July 15th to August 26th and the site notices will remain up for the whole period.
 - The letters will inform owners/occupiers that we are opening a public consultation across these dates. This letter will include guidance on what the changes mean for those remaining in the Article 4 direction Area, and those that will be removed (but are still in the Conservation Area).
 - The requirement is for a public consultation of 21 days' duration. Officers consider, however, that an extended consultation period of six weeks conforms better with the Council's usual practices and takes into account the timing of the consultation within school summer holidays.
 - A copy of the Article 4 directions, Notices and maps will be available on the Council's
 website for the duration of the consultation period and physical copies will be
 available to view at a location available to the public (i.e. Southwold Library, East
 Suffolk House, Riverside). Representations can be made by letter, email or through
 the consultation webpage.
 - Following the public consultation period, representations will be taken into consideration by officers. Any material changes made to the directions as a result of the consultation will require re-consultation.
 - The results of the consultation will be presented to Local Plan Working Group in September 2024 (date TBC) for their feedback.

- The new Article 4 directions will then be presented to Strategic Planning Committee on October 7th 2024, where the public representations will be presented, and it will be proposed to confirm the Article 4 directions and agree for them to come into force on October 14th 2024.
- At this time, the existing Article 4 directions will be cancelled (Schedule 3, sub-para.
 13 of the GPDO (2015): "A local planning authority may, by making a subsequent direction, cancel any direction made by them under article 4(1)")
- On the date the Article 4 directions are confirmed photographic surveys will be undertaken of all of the properties covered by the Article 4 directions. This will contribute to the 'robust evidence' for the Article 4 direction and allow effective enforcement action to be taken if required.

4. Financial Implications

- 4.1. There are circumstances under which the local planning authority may become liable to pay compensation when imposing a new Article 4 direction, when it does so without giving 12 months' notice to those members of the public who would be affected by them.
- 4.2. This liability may arise if the local planning authority:
 - refuses planning permission for development which would have been permitted development if it were not for an Article 4 direction; or
 - grant planning permission subject to more limiting conditions than the GPDO would normally allow, as a result of an Article 4 direction being in place.
- 4.3. **However**, officers judge this to present limited risk only, as most of the areas proposed for the new directions are already covered by existing directions; and no further restrictions are proposed in the new directions.
- 4.4. A new Article 4 direction is proposed in Marlesford and the additions to the Southwold Conservation Areas cover areas that were not previously covered by an Article 4 direction. There is therefore a low level of risk that the LPA would be liable for compensation as described above in these locations. However, there is also a low level of risk that if there is too long of a period between making and confirming the Article 4 directions, works will be undertaken that remove important historic features of buildings before the restrictions come into effect. This level of risk is judged to be higher than the risk of having to pay compensation.
- 4.5. On this basis, therefore, officers judge that there is no necessity to wait 12 months before confirmation of the proposed Article 4 directions.

5. Legal Implications

5.1. All legal requirements have been met as described in this report

6. Risk Implications

Regulatory risk

6.1. There is no formal right of appeal against the making of an Article 4 direction. There could be an application for judicial review if it were thought that the Council had not

considered the merits of the Article 4 direction properly. This is considered to be a very low risk given the clear evidence base on which the directions are based.

Reputational risk

- 6.2. The Local Planning Authority has a duty to pay special attention to the preservation and enhancement of the character and appearance of Conservation Areas, as per section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. If the Article 4 directions are confirmed, they would support this statutory duty.
- 6.3. Confirming the Article 4 directions would also support the delivery of consistent planning and planning enforcement decisions, which would decrease the risk of reputational damage in the future.

7. Options

Either:

7.1. The Strategic Planning Committee agrees to make the new Article 4 directions. This would have the effect of starting a period of public consultation on proposed changes to the Article 4 directions in Southwold, Wangford, Homersfield and Walberswick Quay and on the proposed introduction of an Article 4 direction in Marlesford. The changes to the Article 4 directions would not come into effect unless confirmed by this Committee at a later date, taking into account the results of the public consultation.

Or:

7.2. The Strategic Planning Committee decides not to make the new Article 4 directions. The existing Article 4 directions would remain in place in Southwold, Wangford, Homersfield and Walberswick Quay. No Article 4 direction would be in place in Marlesford. It should be noted that the existing Article 4 directions are not up to date in terms of relevant legislation and Government guidance provided within the latest version of the National Planning Policy Framework.

8. Recommendations

- 8.1. That Strategic Planning Committee:
 - Agrees the making of new Article 4 directions in the Southwold, Homersfield, Wangford Conservation Areas and the Walberswick Quay area of the Walberswick Conservation Area, covering amended areas shown on the maps attached and including those properties and land included in the schedule attached at Appendices Δ-D
 - 2. Agrees the making of a new Article 4 direction in Marlesford, where there is currently no such direction in place, covering the area shown on the map attached including those properties and land included in the schedule attached at Appendix E.
 - 3. Agrees that the statutory public consultation period is to start on July 15th 2024 and conclude on August 26th 2024 to collect public representations including from members of the public affected by the proposed changes.
 - 4. Agrees that, following the statutory public consultation period, the new Article 4 directions will be presented to the Strategic Planning Committee at its meeting on October 7th 2024 to consider their confirmation on October 14th 2024.
 - Agrees that the Head of Planning, Building Control and Coastal Management, in consultation with the Cabinet member with responsibility for Planning and Coastal Management, is authorised to make any presentational or typographical amendments to the Article 4 directions and accompanying maps, prior to the public consultation period.

9. Reasons for Recommendations

- 9.1. Since the existing Article 4 directions came into force in 2008, the national legislation and planning regulations that they were confirmed under have been amended, and national planning policy indicates that any Article 4 directions should be "based on robust evidence and apply to the smallest geographical area possible" (NPPF para. 53).
- 9.2. The proposed new Article 4 directions are based on recently secured and robust evidence of the condition of the Conservation Areas. The proposals have been developed in consultation with the Development Management and Enforcement teams, whose work is most impacted by the Article 4 directions.
- 9.3. It is the view of officers that the new Article 4 directions and the geographical areas covered by them are reasonable and justified. The areas that will be covered by the Article 4 directions retain architectural and historic features that contribute to the character and appearance of the Conservation Areas. Continuing the restriction of permitted development rights in a more targeted way will be policy compliant at national and local level. This will support the preservation and enhancement of the Conservation Areas as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 9.4. The proposals were considered by the Local Plan Working Group at its meeting on May 29th 2024.

10. Conclusions/Next Steps

- 10.1. The making of these new Article 4 directions, including the amended areas that are covered by the Article 4 directions, need to be agreed. If agreed, a period of public consultation will be undertaken before a further decision is made by this Committee on whether to confirm the Article 4 directions. The proposed new Article 4 directions will not come into effect until such time as they are confirmed by a future meeting of this Committee, in the meantime the existing Article 4 directions will remain in place.
- 10.2. Should the Strategic Planning Committee agree the recommendations of this report, a notice containing the Article 4 direction and relevant map will be served by local advertisement, by two site notices, and by letter to all property owners and occupiers in the affected areas (*excluding Southwold as outlined in paragraph 3.18 of this report) on Monday July 15th, starting a public consultation period that will run from July 15th to August 26th 2024.

Areas of consideration comments

Section 151 Officer comments:

No impact on Finance.

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

Not applicable

Safeguarding:

Not applicable

Crime and Disorder:

Not applicable

Corporate Services implications:

Advice was sought from Jacqui Bullen, Planning Lead Lawyer on the legal and financial implications set out in this report.

The web team and GIS officers have provided support for this project.

Residents and Businesses consultation/consideration:

The proposal will trigger a period of public consultation as set out in the main body of the report

Appendices:		
Appendix A	Proposed Southwold Article 4 direction including schedule of land and	
	property and consultation map	
Appendix B	Proposed Wangford Article 4 direction including schedule of land and	
	property and consultation map	
Appendix C	Proposed Homersfield Article 4 direction including schedule of land and	
	property and consultation map	
Appendix D	Proposed Walberswick Quay Article 4 direction including schedule of land	
	and property and consultation map	
Appendix E	E Proposed Marlesford Article 4 direction including schedule of land and	
	property and consultation map	
Appendix F	Survey methodology and survey maps	

Background reference papers:		
Date	Туре	Available From
2015	Town and Country Planning (General Permitted Development) (England) Order 2015	The Town and Country Planning (General Permitted Development) (England) Order 2015 (legislation.gov.uk)
1990	Planning (Listed Building and Conservation Areas) Act 1990	Planning (Listed Buildings and Conservation Areas) Act 1990 (legislation.gov.uk)
2019	Waveney Local Plan	Adopted-Waveney-Local-Plan-including- Erratum.pdf (eastsuffolk.gov.uk)

2020	Suffolk Coastal Local Plan	East-Suffolk-Council-Suffolk-Coastal- Local-Plan.pdf (eastsuffolk.gov.uk)
2021	National Planning Policy Framework	National Planning Policy Framework (publishing.service.gov.uk)
2021	Historic Environment SPD	Historic-Environment-SPD-reduced.pdf (eastsuffolk.gov.uk)
2008	Existing Southwold Article 4 direction	Southwold-Conservation-Area-Article-4- Direction-order.pdf (eastsuffolk.gov.uk)
2008	Existing Wangford Article 4 direction	Wangford-Conservation-Area-Article-4- Direction-order.pdf (eastsuffolk.gov.uk)
2008	Existing Homersfield Article 4 direction	Homersfield-Conservation-Area-Article- 4-Direction-order.pdf (eastsuffolk.gov.uk)
2008	Existing Southwold Harbour and Walberswick Quay Article 4 direction	Southwold-Harbour-Conservation-Area- Article-4-Direction-order.pdf (eastsuffolk.gov.uk)
2024	Southwold Conservation Area Appraisal	Southwold Conservation Area (eastsuffolk.gov.uk)
2009	Wangford Conservation Area Appraisal	Wangford-Conservation-Area-Character- Appraisal-with-Management-Plan.pdf (eastsuffolk.gov.uk)
2020	Homersfield Conservation Area Appraisal	Homersfield-CAA-Feb-20.pdf (eastsuffolk.gov.uk)
2024	Walberswick Conservation Area Appraisal	TOPOGRAPHICAL BACKGROUND (eastsuffolk.gov.uk)
2014	Marlesford Conservation Area Appraisal	TOPOGRAPHICAL BACKGROUND (eastsuffolk.gov.uk)

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015

Direction Made under Article 4(1)

SOUTHWOLD CONSERVATION AREA AMENDED AREA 2024

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

DIRECTION MADE UNDER ARTICLE 4(1)

SOUTHWOLD CONSERVATION AREA

WHEREAS the Council of the District of East Suffolk being the appropriate Local Planning Authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order") are satisfied that it is expedient that development of the descriptions set out in the First Schedule should not be carried out within the area of land designated in the Second Schedule such land being outlined in red on the plan annexed hereto unless permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Order HEREBY DIRECTS that the permission granted by Article 3 of the Order shall not apply to the development specified in the First Schedule in respect of the land described in the Second Schedule.

For the purposes of this Direction the expression 'relevant location' (wherever it may appear) shall mean a highway, waterway or open space.

FIRST SCHEDULE

- (a) The enlargement, improvement or other alteration of a dwellinghouse, being the development comprised of Class A of Part I of Schedule 2 of the Order where any part of the enlargement, improvement or other alterations would front a relevant location.
- (b) The enlargement or alteration of a dwellinghouse consisting of an addition or alteration to its roof, being the development comprised of Class B and Class C of Part I of Schedule 2 of the Order where any such alteration would be to a roof slope which fronts a relevant location.
- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being the development comprised within Class D of Part I of Schedule 2 of the Order where any such alteration would front a relevant location.
- (d) The provision within the curtilage of the dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or a container used for domestic heating purposes for the storage of oil or liquid petroleum gas, being the development comprised within Class E of Part I of Schedule 2 of the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the

- building or enclosure maintained, improved or altered would front a relevant location.
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such; or the replacement in whole or in part of such a surface, being the development comprised within Class F of Part I of Schedule 2 of the Order where the hard surface would front a relevant location.
- (f) The installation, alteration or replacement of a chimney, flue or soil and vent pipe on a dwellinghouse, being the development comprised within Class G of Part I of Schedule 2 of the Order where any such alteration would be to a wall or roof slope which fronts a relevant location.
- (g) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being the development comprised within Class A of Part 2 of Schedule 2 of the Order where the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location.

SECOND SCHEDULE

Cafe And Wine Cellar Store 4 Drayman Square	
Southwold Suffolk IP18 6GB	
Southwold Sailing Club Blackshore Southwold	
Suffolk IP18 6TA	
9 Bartholomew Green Southwold Suffolk IP18	
6JA	
11 Bartholomew Green Southwold Suffolk IP18	
6JA	
12 Bartholomew Green Southwold Suffolk IP18	
6JA	
The Harbour Inn Blackshore Southwold Suffolk	
IP18 6TA	
1 Hope Cottages Church Green Southwold	
Suffolk IP18 6JB	
2 Hope Cottages Church Green Southwold	
Suffolk IP18 6JB	
3 Hope Cottages Church Green Southwold	
Suffolk IP18 6JB	
4 Hope Cottages Church Green Southwold	
Suffolk IP18 6JB	
5 Hope Cottages Church Green Southwold	
Suffolk IP18 6JB	
6 Hope Cottages Church Green Southwold	
Suffolk IP18 6JB	
14 Barnaby Green Southwold Suffolk IP18 6AP	
1 Barnaby Green Southwold Suffolk IP18 6AP	
13 Barnaby Green Southwold Suffolk IP18 6AP	
15 Barnaby Green Southwold Suffolk IP18 6AP	
16 Barnaby Green Southwold Suffolk IP18 6AP	
17 Barnaby Green Southwold Suffolk IP18 6AP	

Milner Cottage 18 Barnaby Green Southwold Suffolk IP18 6AP
1 Bartholomew Green Southwold Suffolk IP18 6JA
2 Bartholomew Green Southwold Suffolk IP18 6JA
3 Bartholomew Green Southwold Suffolk IP18 6JA
4 Bartholomew Green Southwold Suffolk IP18 6JA
5 Bartholomew Green Southwold Suffolk IP18 6JA
6 Bartholomew Green Southwold Suffolk IP18 6JA
7 Bartholomew Green Southwold Suffolk IP18 6JA
8 Bartholomew Green Southwold Suffolk IP18 6JA
10 Bartholomew Green Southwold Suffolk IP18 6JA
13 Bartholomew Green Southwold Suffolk IP18 6JA
14 Bartholomew Green Southwold Suffolk IP18 6JA
15 Bartholomew Green Southwold Suffolk IP18 6JA
16 Bartholomew Green Southwold Suffolk IP18 6JA
17 Bartholomew Green Southwold Suffolk IP18 6JA

3 Blackshore Southwold Suffolk IP18 6TA 4 Blackshore Southwold Suffolk IP18 6TA The Old Fishermans Hut 5 Blackshore Southwold Suffolk IP18 6TA The Old Mill The Common Southwold Suffolk IP18 6AH Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP	Flat 10 The Craighurst 11 - 13 North Parade Southwold Suffolk IP18 6LP Beach House 4 East Cliff Southwold Suffolk IP18 6EL Flat 1 Beach House 4 East Cliff Southwold Suffolk IP18 6EL 1 Hurren Terrace Station Road Southwold Suffolk IP18 6BY
4 Blackshore Southwold Suffolk IP18 6TA The Old Fishermans Hut 5 Blackshore Southwold Suffolk IP18 6TA The Old Mill The Common Southwold Suffolk IP18 6AH Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP	Beach House 4 East Cliff Southwold Suffolk IP18 6EL Flat 1 Beach House 4 East Cliff Southwold Suffolk IP18 6EL 1 Hurren Terrace Station Road Southwold
The Old Fishermans Hut 5 Blackshore Southwold Suffolk IP18 6TA The Old Mill The Common Southwold Suffolk IP18 6AH Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP	6EL Flat 1 Beach House 4 East Cliff Southwold Suffolk IP18 6EL 1 Hurren Terrace Station Road Southwold
Southwold Suffolk IP18 6TA The Old Mill The Common Southwold Suffolk IP18 6AH Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP	Flat 1 Beach House 4 East Cliff Southwold Suffolk IP18 6EL 1 Hurren Terrace Station Road Southwold
The Old Mill The Common Southwold Suffolk IP18 6AH Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP 4	Suffolk IP18 6EL 1 Hurren Terrace Station Road Southwold
IP18 6AH Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP 4	1 Hurren Terrace Station Road Southwold
Manor Garden Cottage Woodleys Yard High Street Southwold Suffolk IP18 6HP 4	
Street Southwold Suffolk IP18 6HP 4	
	48B Stradbroke Road Southwold Suffolk IP18
Manor Lodge Woodleys Yard High Street 6	6LQ
	Flat 1 Crombie House The Common Southwold
Cliff House 2 East Cliff Southwold Suffolk IP18	Suffolk IP18 6AL
6EL F	Flat 2 Crombie House The Common Southwold
Shrimp Cottage 3 East Cliff Southwold Suffolk	Suffolk IP18 6AL
IP18 6EL 1	10 East Cliff Southwold Suffolk IP18 6JJ
5 East Cliff Southwold Suffolk IP18 6JJ	Poppy Cottage Skilmans Hill Southwold Suffolk
6 East Cliff Southwold Suffolk IP18 6JJ	P18 6EY
7 East Cliff Southwold Suffolk IP18 6JJ	Astondene 13 East Cliff Southwold Suffolk IP18
8 East Cliff Southwold Suffolk IP18 6JJ	6JJ
	Fairway Cottage The Common Southwold
Barrey House II East Cill SouthWold Sarroik	Suffolk IP18 6AL
11 10 033	5 The Common Southwold Suffolk IP18 6AL
12 East Cili Sodeliwold Sariolk ii 15 Cis	Mill House The Common Southwold Suffolk IP18
Bayview 14 Last Cilii Southword Suriolk II 18 033	6AH
15 Edst Cili Sodeliwold Salion ii 10 033	Mariners The Common Southwold Suffolk IP18
The Wigwain 10 Last Cili Southword Surfolk	6AH
	The Presbytery The Common Southwold Suffolk
17 East Cilii Sodtiiwold Sdiloik ii 18 033	IP18 6AH
177 Last cim seathward sarrain in 18 633	Homeleigh The Common Southwold Suffolk IP18 6HR
Stolle House Gull Hill Southwold Sulloik IF16	The Paddock The Common Southwold Suffolk
OTT.	P18 6AH
1 Cililus fatu iviai ket Piace Soutiiwolu Suifoik	Woodleys The Common Southwold Suffolk IP18
.: 13 331	6HR
Na cottage 2 childs fard Market Flace	Gun Hill House Gun Hill Southwold Suffolk IP18
Southword Surfork II 18 0DZ	6HF
Skiillalis Cottage Skiillalis Hill Southwold	Gun Hill Place Gun Hill Southwold Suffolk IP18
Salloik ii 10 de i	6HF
Jessally Cottage Skillians Hill Southwold	Southwold House Gun Hill Southwold Suffolk
Salloik ii 10 de i	IP18 6HF
Suffolk IP18 6EY	Windy Peak Gun Hill Southwold Suffolk IP18
Sanon ii 10 021	6HF
	Stablings Gun Hill Southwold Suffolk IP18 6HF
	Old Hall Cottage Woodleys Yard High Street
	Southwold Suffolk IP18 6HP
	2 Cumberland Close Southwold Suffolk IP18 6JR
	Flat 3 Strathmore House North Parade
IP18 6EY	Southwold Suffolk IP18 6LT
riat 5 file Claightuist 11 - 15 North Larade	11 South Green Southwold Suffolk IP18 6EU
Southwold Suffolk IP18 6LP	Flint Cottage Centre Cliff South Green
The Martings Woodleys rard riight Street	Southwold Suffolk IP18 6EN
Soder Word Surrow in 10 or in	Sea View Cottage 25 St James Green Southwold
S	Suffolk IP18 6JL

1 Centre Cliff South Green Southwold Suffolk IP18 6EN	1 Eversley Court Wymering Road Southwold Suffolk IP18 6AH
Seacroft 18 East Cliff Southwold Suffolk IP18 6JJ	2 Eversley Court Wymering Road Southwold
Church House The Common Southwold Suffolk	Suffolk IP18 6BF
IP18 6HR	3 Eversley Court Wymering Road Southwold
18 Victoria Street Southwold Suffolk IP18 6JF	Suffolk IP18 6BF
1 Cumberland Close Southwold Suffolk IP18 6JR	4 Eversley Court Wymering Road Southwold
3 Cumberland Close Southwold Suffolk IP18 6JR	Suffolk IP18 6BF
4 Cumberland Close Southwold Suffolk IP18 6JR	5 Eversley Court Wymering Road Southwold
5 Cumberland Close Southwold Suffolk IP18 6JR	Suffolk IP18 6AH
6 Cumberland Close Southwold Suffolk IP18 6JR	6 Eversley Court Blackmill Road Southwold
South Cliff Cottage South Green Southwold	Suffolk IP18 6AQ
Suffolk IP18 6HA	9 Eversley Court Wymering Road Southwold
Seaview House 27 St James Green Southwold	Suffolk IP18 6AH
Suffolk IP18 6JL	10 Eversley Court The Common Southwold
Unit 15b Southwold Business Centre St	Suffolk IP18 6AH
Edmunds Road Southwold Suffolk IP18 6JU	4A Ferry Road Southwold Suffolk IP18 6HQ
1 Eversley Road Southwold Suffolk IP18 6AW	67A High Street Southwold Suffolk IP18 6DS
Unit 16a Southwold Business Centre St	Fisherman's Hut B04 Blackshore Southwold
Edmunds Road Southwold Suffolk IP18 6JU	Suffolk
Unit 17a Southwold Business Centre St	Fisherman's Hut B03 Blackshore Southwold
Edmunds Road Southwold Suffolk IP18 6JU	Suffolk IP18 6TA
6 - 38 Church Street Southwold Suffolk	Fisherman's Hut B01 Blackshore Southwold Suffolk
59A High Street Southwold Suffolk IP18 6DJ	Fisherman's Hut B02 Blackshore Southwold
Unit 16b Southwold Business Centre St	Suffolk
Edmunds Road Southwold Suffolk IP18 6JU	Fisherman's Hut B00 Blackshore Southwold
Sailors Reading Room East Cliff Southwold	Suffolk
Suffolk	2B High Street Southwold Suffolk IP18 6AE
37A High Street Southwold Suffolk IP18 6AB	Flat 12 The Craighurst 11 - 13 North Parade
1 - 3 East Street Southwold Suffolk IP18 6ED	Southwold Suffolk IP18 6LP
Brewery Victoria Street Southwold Suffolk IP18 6JW	Southwold Reydon And District Conservative
United Reformed Church High Street Southwold	Club Woodleys Yard High Street Southwold
Suffolk IP18 6HP	Suffolk IP18 6HP
St Edmunds Church Bartholomew Green	Breaker 39A High Street Southwold Suffolk IP18
Southwold Suffolk IP18 6JA	6AB
Southwold Lighthouse Stradbroke Road	39C High Street Southwold Suffolk IP18 6AB
Southwold Suffolk IP18 6LU	30 Tibbys Way Southwold Suffolk IP18 6GL
Crombie House The Common Southwold Suffolk	28 Tibbys Way Southwold Suffolk IP18 6GL
IP18 6AL	26 Tibbys Way Southwold Suffolk IP18 6GL
Hope Cottages Church Green Southwold Suffolk	The Swallows 24 Tibbys Way Southwold Suffolk
IP18 6JB	IP18 6GL
Wantage House The Common Southwold	22 Tibbys Way Southwold Suffolk IP18 6GL
Suffolk IP18 6AH	20 Tibbys Way Southwold Suffolk IP18 6GL
Woodleys Yard High Street Southwold Suffolk	16 Tibbys Way Southwold Suffolk IP18 6GL
IP18 6HP	12 Tibbys Way Southwold Suffolk IP18 6GL
Roshven House 21 York Road Southwold Suffolk	18A Tibbys Way Southwold Suffolk IP18 6GL
IP18 6AN	14 Tibbys Way Southwold Suffolk IP18 6GL
69 - 69A High Street Southwold Suffolk IP18 6DS	1 Tibbys Way Southwold Suffolk IP18 6GL
4A North Green Southwold Suffolk IP18 6AT	3 Tibbys Way Southwold Suffolk IP18 6GL
Southwold Town Council Town Hall 4 Market	5 Tibbys Way Southwold Suffolk IP18 6GL
Place Southwold Suffolk IP18 6EE	7 Tibbys Way Southwold Suffolk IP18 6GL
The Break Charity 9 East Street Southwold	9 Tibbys Way Southwold Suffolk IP18 6GL
Suffolk IP18 6EH	11 Tibbys Way Southwold Suffolk IP18 6GL
	4 Simons Path Southwold Suffolk IP18 6GH

5 Simons Path Southwold Suffolk IP18 6GL 19 Tibbys Way Southwold Suffolk IP18 6GL	Flat Over 4 - 6 Queen Street Southwold Suffolk IP18 6EQ
15 Tibbys Way Southwold Suffolk IP18 6GL	Workshops 21 Church Street Southwold Suffolk
17 Tibbys Way Southwold Suffolk IP18 6GL	IP18 6JG
1 Drayman Square Southwold Suffolk IP18 6GB	Ash Tree Cottage 3 Victoria Street Southwold
21 Tibbys Way Southwold Suffolk IP18 6GL	Suffolk IP18 6HZ
23 Tibbys Way Southwold Suffolk IP18 6GL	5 Bank Alley Southwold Suffolk IP18 6JD
25 Tibbys Way Southwold Suffolk IP18 6GL	15A Field Stile Road Southwold Suffolk IP18 6LD
10 Tibbys Way Southwold Suffolk IP18 6GL	15 Field Stile Road Southwold Suffolk IP18 6LD
8 Tibbys Way Southwold Suffolk IP18 6GL	16 Field Stile Road Southwold Suffolk IP18 6LD
6 Tibbys Way Southwold Suffolk IP18 6GL	64B High Street Southwold Suffolk IP18 6DN
2 Tibbys Way Southwold Suffolk IP18 6GL	Blackshore Corner Blackshore Southwold
1 Simons Path Southwold Suffolk IP18 6GH	Suffolk IP18 6TA
4 Tibbys Way Southwold Suffolk IP18 6GL	68A High Street Southwold Suffolk IP18 6DN
2 Simons Path Southwold Suffolk IP18 6GH	68B High Street Southwold Suffolk IP18 6DN
3 Simons Path Southwold Suffolk IP18 6GH	68C High Street Southwold Suffolk IP18 6DN
2 Drayman Square Southwold Suffolk IP18 6GB	5 Station Road Southwold Suffolk IP18 6AX
3 Drayman Square Southwold Suffolk IP18 6GB	Walton House First And Second Floors East
Hurren Terrace Station Road Southwold Suffolk	Street Southwold Suffolk IP18 6EJ
The Flat 74 High Street Southwold Suffolk IP18	14B Southwold Business Centre St Edmunds
6DN	Road Southwold Suffolk
16 Victoria Street Southwold Suffolk IP18 6JF	Unit 19 Southwold Business Centre St Edmunds
Cornfield Mews 6A Stradbroke Road Southwold	Road Southwold Suffolk IP18 6JU
Suffolk IP18 6LQ	27C North Parade Southwold Suffolk IP18 6LT
4 Manor Farm Close Southwold Suffolk IP18 6DL	70A High Street Southwold Suffolk IP18 6DN
Roman Catholic Church Hall Wymering Road	Basement 43 High Street Southwold Suffolk
Southwold Suffolk IP18 6AG	IP18 6AB
The Lookout Mill Lane Southwold Suffolk IP18	The Wee House The Craighurst 11 - 13 North
6HW	Parade Southwold Suffolk
The Casino Gun Hill Southwold Suffolk IP18 6DJ	Smokehouse Cottage Cumberland Road
67A North Road Southwold Suffolk IP18 6BH	Southwold Suffolk IP18 6JP
24 - 26 Church Street Southwold Suffolk	10 North Green Southwold Suffolk IP18 6AT
The Stables Mill Lane Southwold Suffolk	2 Church Street Southwold Suffolk IP18 6JG
1 The Stables Mill Lane Southwold Suffolk IP18	Fishermans Hut 1 Skilmans Hill Southwold
6HW	Suffolk
2 The Stables Mill Lane Southwold Suffolk IP18	Fishermans Hut 2 Skilmans Hill Southwold
6HW	Suffolk
3 The Stables Mill Lane Southwold Suffolk IP18	8A East Street Southwold Suffolk IP18 6EH
6HW	1 Mackenzie Mews 58 High Street Southwold
4 The Stables Mill Lane Southwold Suffolk IP18	Suffolk IP18 6DN
6HW	2 Mackenzie Mews 58 High Street Southwold
18B Tibbys Way Southwold Suffolk IP18 6GL	Suffolk IP18 6DN
3A Tibbys Way Southwold Suffolk IP18 6GL	3 Mackenzie Mews 58 High Street Southwold
7A Tibbys Way Southwold Suffolk IP18 6GL	Suffolk IP18 6DN
11A Tibbys Way Southwold Suffolk IP18 6GL	MacKenzie Mews 58 High Street Southwold
14A Southwold Business Centre St Edmunds	Suffolk
Road Southwold Suffolk IP18 6JU	1 Market Place Southwold Suffolk
Fishermans Store Gardner Road Southwold	The Sandlings Field Stile Road Southwold Suffolk
Suffolk IP18 6HJ	IP18 6LX
The Hollies The Common Southwold Suffolk	1 The Sandlings Field Stile Road Southwold
IP18 6AH	Suffolk IP18 6LX
Electric Picture Palace Blackmill Road	2 The Sandlings Field Stile Road Southwold Suffolk IP18 6LX
Southwold Suffolk IP18 6AQ	3 The Sandlings Field Stile Road Southwold
3A Station Road Southwold Suffolk IP18 6AX	Suffolk IP18 6LX
	SULLINI TO OEX

Weavers Cottage 5 And Loom Cottage 6 Spinners Lane Southwold Suffolk IP18 6AR	Flat 1 Anchor Point York Road Southwold Suffolk IP18 6FA
1 White Point Eversley Road Southwold Suffolk IP18 6AW	Flat 2 Anchor Point York Road Southwold Suffolk IP18 6FA
2 White Point Eversley Road Southwold Suffolk IP18 6AW	Flat 3 Anchor Point York Road Southwold Suffolk IP18 6FA
3 White Point Eversley Road Southwold Suffolk IP18 6AW	Flat 4 Anchor Point York Road Southwold Suffolk IP18 6FA
The Cornstore Blackmill Road Southwold Suffolk IP18 6AQ	Flat 5 Anchor Point York Road Southwold Suffolk IP18 6FA
The Rope House Station Road Southwold Suffolk IP18 6AX	31A High Street Southwold Suffolk IP18 6AD
2 Ogilvie House York Road Southwold Suffolk	31B High Street Southwold Suffolk IP18 6AD
IP18 6AN	Courtyard Rear Of 73-79 High Street Southwold Suffolk
1 Ogilvie House York Road Southwold Suffolk IP18 6AN	Stone House Cottage Gun Hill Southwold Suffolk IP18 6HF
3 Ogilvie House York Road Southwold Suffolk IP18 6AN	Anchor Point York Road Southwold Suffolk IP18 6FA
4 Ogilvie House York Road Southwold Suffolk	33 High Street Southwold Suffolk IP18 6AB
IP18 6AN Basement Cafe 81 High Street Southwold	9 Marlborough Road Southwold Suffolk IP18 6LR
Suffolk IP18 6DS	The Elms Mews Lorne Road Southwold Suffolk
72A High Street Southwold Suffolk IP18 6DN	IP18 6EP
72B High Street Southwold Suffolk IP18 6DN	7B Childs Yard Market Place Southwold Suffolk
The Hideaway Cumberland Close Southwold	IP18 6DZ
Suffolk IP18 6JR	The Brewers House 55 Victoria Street
The Upper Deck 12 Queen Street Southwold	Southwold Suffolk IP18 6JQ
Suffolk IP18 6EQ	Matrons House St Edmunds Road Southwold
Methodist Church East Green Southwold Suffolk	Suffolk IP18 6LB
IP18 6JN	1 The Old Hospital Field Stile Road Southwold
Smokehouse Court East Street Southwold	Suffolk IP18 6LD
Suffolk IP18 6DQ	2 The Old Hospital Field Stile Road Southwold
1 Smokehouse Court East Street Southwold	Suffolk IP18 6LD
Suffolk IP18 6DQ	Town Farm Cottage St Edmunds Road
2 Smokehouse Court East Street Southwold	Southwold Suffolk IP18 6LB
Suffolk IP18 6DQ	1A Cautley Road Southwold Suffolk IP18 6DD
3 Smokehouse Court East Street Southwold Suffolk IP18 6DQ	8 The Old Hospital Field Stile Road Southwold Suffolk IP18 6LD
Mizzen Flat At Wantage House The Common	9 The Old Hospital Field Stile Road Southwold
Southwold Suffolk IP18 6AH	Suffolk IP18 6LD
Flats 1 And 2 Farview Blackmill Road Southwold Suffolk IP18 6AQ	10 The Old Hospital Field Stile Road Southwold Suffolk IP18 6LD
25 High Street Southwold Suffolk IP18 6AD	7 The Old Hospital Field Stile Road Southwold
25A High Street Southwold Suffolk IP18 6AD	Suffolk IP18 6LD
23 High Street Southwold Suffolk IP18 6AD	5 The Old Hospital Field Stile Road Southwold
23A High Street Southwold Suffolk IP18 6AD	Suffolk IP18 6LD
Barnabys Rest Barnaby Green Southwold Suffolk IP18 6AD	6 The Old Hospital Field Stile Road Southwold Suffolk IP18 6LD
Glebe Cottage 6A Victoria Street Southwold Suffolk IP18 6HZ	3 The Old Hospital Field Stile Road Southwold Suffolk IP18 6LD
Visitor Centre Rear Of Swan Hotel Market Place	4 The Old Hospital Field Stile Road Southwold
Southwold Suffolk IP18 6EG	Suffolk IP18 6LD
Flat At 84 - 86 High Street Southwold Suffolk	The Sacred Heart Church Wymering Road
	Southwold Suffolk IP18 6AG

22D High Street Southwoold Suffelly ID19 CAD
23B High Street Southwold Suffolk IP18 6AD
The Old Hospital Field Stile Road Southwold Suffolk
66A High Street Southwold Suffolk IP18 6DN
Flat 1 2 East Street Southwold Suffolk IP18 6EH
Flat 2 2 East Street Southwold Suffolk IP18 6EH
Garden Studio Youngs Yard Victoria Street
Southwold Suffolk IP18 6JE
8 Eversley Court The Common Southwold Suffolk IP18 6AH
The Dolls House 89 Victoria Street Southwold Suffolk IP18 6JQ
Work Accommodation At 5 Victoria Street
Southwold Suffolk IP18 6HZ
Units 1 2 And 6 Southwold Business Centre St
Edmunds Road Southwold Suffolk
Secret House 21 St James Green Southwold Suffolk IP18 6JL
57 High Street Southwold Suffolk IP18 6DJ
North Star 9 North Parade Southwold Suffolk IP18 6LP
The Shiny Pebble 9 Trinity Street Southwold
Suffolk
The Treasure Chest 9 Trinity Street Southwold
Suffolk
1 Station Road Southwold Suffolk IP18 6AX
1A Station Road Southwold Suffolk IP18 6AX
Station Yard Blyth Road Southwold Suffolk IP18
6FH
Store Rear Of 100 High Street Southwold Suffolk
IP18 6DP
Flat At 7 East Green Southwold Suffolk IP18 6JN
Unit 1 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 2 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 3 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 4 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 5 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 6 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 7 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 8 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 9 Station Yard Blyth Road Southwold
Suffolk IP18 6FH
Unit 10 Station Yard Blyth Road Southwold
Onit 10 Station Yard Blyth Road Southwold Suffolk IP18 6FH
5 Trinity Street Southwold Suffolk IP18 6JH
7. T. C C I I. C. C. II 1040 C
7 Trinity Street Southwold Suffolk IP18 6JH 8 Trinity Street Southwold Suffolk IP18 6JH

10 Trinity Street Southwold Suffolk IP18 6JH
Trinity Cottage 12 Trinity Street Southwold
Suffolk IP18 6JH
13 Trinity Street Southwold Suffolk IP18 6JH
15 Trinity Street Southwold Suffolk IP18 6JH
17 Trinity Street Southwold Suffolk IP18 6JH
1 Bank Alley Southwold Suffolk IP18 6JD
1 Cautley Road Southwold Suffolk IP18 6DD
3 Cautley Road Southwold Suffolk IP18 6DD
5 Cautley Road Southwold Suffolk IP18 6DD
7 Cautley Road Southwold Suffolk IP18 6DD
9A Cautley Road Southwold Suffolk IP18 6DD
9 Cautley Road Southwold Suffolk IP18 6DD
11 Cautley Road Southwold Suffolk IP18 6DD
1B Chester Road Southwold Suffolk IP18 6LN
1 Chester Road Southwold Suffolk IP18 6LN
3A Chester Road Southwold Suffolk IP18 6LN
3 Chester Road Southwold Suffolk IP18 6LN
4 Chester Road Southwold Suffolk IP18 6LN
5 Chester Road Southwold Suffolk IP18 6LN
6 Chester Road Southwold Suffolk IP18 6LN
7 Chester Road Southwold Suffolk IP18 6LN
8 Chester Road Southwold Suffolk IP18 6LN
9A Chester Road Southwold Suffolk IP18 6LN
9B Chester Road Southwold Suffolk IP18 6LN
9C Chester Road Southwold Suffolk IP18 6LN
10 Chester Road Southwold Suffolk IP18 6LN
11A Chester Road Southwold Suffolk IP18 6LN
12 Chester Road Southwold Suffolk IP18 6LN
14 Chester Road Southwold Suffolk IP18 6LN
18 Chester Road Southwold Suffolk IP18 6LN
3 Church Street Southwold Suffolk IP18 6JG
5 Church Street Southwold Suffolk IP18 6JG
7 Church Street Southwold Suffolk IP18 6JG
9 Church Street Southwold Suffolk IP18 6JG
11 Church Street Southwold Suffolk IP18 6JG
Smugglers Cottage 13 Church Street Southwold
Suffolk IP18 6JG
15 Church Street Southwold Suffolk IP18 6JG
17 Church Street Southwold Suffolk IP18 6JG
19 Church Street Southwold Suffolk IP18 6JG
42 Church Street Southwold Suffolk IP18 6JG
Clyde Cottage 15 Constitution Hill Southwold Suffolk IP18 6HE
14 Cumberland Road Southwold Suffolk IP18
6JP
15 Cumberland Road Southwold Suffolk IP18
6JP
16 Cumberland Road Southwold Suffolk IP18
6JP
17 Cumberland Road Southwold Suffolk IP18
6JP
20 Cumberland Road Southwold Suffolk IP18
6JP

21 Cumberland Road Southwold Suffolk IP18
бЈР
23 Cumberland Road Southwold Suffolk IP18
бЈР
Church Green Cottage 24 Cumberland Road
Southwold Suffolk IP18 6JP
25 Cumberland Road Southwold Suffolk IP18
6JP
St Edmunds Cottage 26 Cumberland Road
Southwold Suffolk IP18 6JP
The Pink House 27 Cumberland Road Southwold
Suffolk IP18 6JP
1 Dunwich Road Southwold Suffolk IP18 6LJ
3 Dunwich Road Southwold Suffolk IP18 6LJ
4 Dunwich Road Southwold Suffolk IP18 6LJ
5 Dunwich Road Southwold Suffolk IP18 6LJ
6 Dunwich Road Southwold Suffolk IP18 6LJ
7 Dunwich Road Southwold Suffolk IP18 6LJ
9 Dunwich Road Southwold Suffolk IP18 6LJ
10 Dunwich Road Southwold Suffolk IP18 6LJ
12 Dunwich Road Southwold Suffolk IP18 6LJ
14 Dunwich Road Southwold Suffolk IP18 6LJ
3 East Green Southwold Suffolk IP18 6JN
4 East Green Southwold Suffolk IP18 6JN
5 East Green Southwold Suffolk IP18 6JN
6A East Green Southwold Suffolk IP18 6JN
6 East Green Southwold Suffolk IP18 6JN
9 East Green Southwold Suffolk IP18 6JN
10 East Green Southwold Suffolk IP18 6JN
11 East Green Southwold Suffolk IP18 6JN
Cornfield Cottage 12 East Green Southwold
Suffolk IP18 6JN
2 East Street Southwold Suffolk IP18 6EH
7 East Street Southwold Suffolk IP18 6EH
10 East Street Southwold Suffolk IP18 6EH
12 East Street Southwold Suffolk IP18 6EH
13 East Street Southwold Suffolk IP18 6EJ
14 East Street Southwold Suffolk IP18 6EH
15 East Street Southwold Suffolk IP18 6EJ
17 East Street Southwold Suffolk IP18 6EJ
Dolphin Cottage 28 East Street Southwold
Suffolk IP18 6EH
Holeystone Cottage 30 East Street Southwold
Suffolk IP18 6EH
32 East Street Southwold Suffolk IP18 6EH
38 East Street Southwold Suffolk IP18 6EJ
40 East Street Southwold Suffolk IP18 6EJ
2 Ferry Road Southwold Suffolk IP18 6HQ
6 Ferry Road Southwold Suffolk IP18 6HQ
·
10 Ferry Road Southwold Suffolk IP18 6HQ
Mouse Hall 1 Field Stile Road Southwold Suffolk IP18 6LA
Tibbys View 2 Field Stile Road Southwold Suffolk
IP18 6LA
3 Field Stile Road Southwold Suffolk IP18 6LA

Eastholme 4 Field Stile Road Southwold Suffolk **IP18 6LA** Eastholme 4 Field Stile Road Southwold Suffolk IP18 6LA 5 Field Stile Road Southwold Suffolk IP18 6LA 6 Field Stile Road Southwold Suffolk IP18 6LA 7 Field Stile Road Southwold Suffolk IP18 6LA 8 Field Stile Road Southwold Suffolk IP18 6LA 9 Field Stile Road Southwold Suffolk IP18 6LA 10A Field Stile Road Southwold Suffolk IP18 6LD 10 Field Stile Road Southwold Suffolk IP18 6LD 12A Field Stile Road Southwold Suffolk IP18 6LD 12B Field Stile Road Southwold Suffolk IP18 6LD 12C Field Stile Road Southwold Suffolk IP18 6LD 14 Field Stile Road Southwold Suffolk IP18 6LD 18 Field Stile Road Southwold Suffolk IP18 6LD 19 Field Stile Road Southwold Suffolk IP18 6LD 20 Field Stile Road Southwold Suffolk IP18 6LD 21 Field Stile Road Southwold Suffolk IP18 6LD 22 Field Stile Road Southwold Suffolk IP18 6LD 23 Field Stile Road Southwold Suffolk IP18 6LD 24 Field Stile Road Southwold Suffolk IP18 6LD 25 Field Stile Road Southwold Suffolk IP18 6LD 26B Field Stile Road Southwold Suffolk IP18 6LD 27 Field Stile Road Southwold Suffolk IP18 6LD 28 Field Stile Road Southwold Suffolk IP18 6LD 29 Field Stile Road Southwold Suffolk IP18 6LD 30 Field Stile Road Southwold Suffolk IP18 6LD 31 Field Stile Road Southwold Suffolk IP18 6LD Woodmill 5 Gardner Road Southwold Suffolk IP18 6HJ 2 Godyll Road Southwold Suffolk IP18 6AJ Ferndale Cottage 1 High Street Southwold Suffolk IP18 6AS 4 High Street Southwold Suffolk IP18 6AE 6 High Street Southwold Suffolk IP18 6AE 8 High Street Southwold Suffolk IP18 6AE 9 High Street Southwold Suffolk IP18 6AS 10 High Street Southwold Suffolk IP18 6AE 11 High Street Southwold Suffolk IP18 6AS 13 High Street Southwold Suffolk IP18 6AS 14 High Street Southwold Suffolk IP18 6AE 15 High Street Southwold Suffolk IP18 6AS 16 High Street Southwold Suffolk IP18 6AE 17 High Street Southwold Suffolk IP18 6AS 20 High Street Southwold Suffolk IP18 6AE 21 High Street Southwold Suffolk IP18 6AS 22 High Street Southwold Suffolk IP18 6AE 24 High Street Southwold Suffolk IP18 6AE 26A High Street Southwold Suffolk IP18 6AE 26 High Street Southwold Suffolk IP18 6AE 27A High Street Southwold Suffolk IP18 6AD 28 High Street Southwold Suffolk IP18 6AE 29 High Street Southwold Suffolk IP18 6AD 30 High Street Southwold Suffolk IP18 6AE

	eet Southwold Suffolk IP18 6AE reet Southwold Suffolk IP18 6AB
	eet Southwold Suffolk IP18 6AE
	eet Southwold Suffolk IP18 6AB
	eet Southwold Suffolk IP18 6AB
	eet Southwold Suffolk IP18 6AE
Suffolk IP18	
	reet Southwold Suffolk IP18 6DJ
	reet Southwold Suffolk IP18 6DJ
	House 56 High Street Southwold
Suffolk IP18	
	eet Southwold Suffolk IP18 6DJ
	reet Southwold Suffolk IP18 6DN
	eet Southwold Suffolk IP18 6DS
	eet Southwold Suffolk IP18 6DN
	eet Southwold Suffolk IP18 6DN
	eet Southwold Suffolk IP18 6DN
	eet Southwold Suffolk IP18 6DS
	reet Southwold Suffolk IP18 6DP
Ettrick 46A 6BP	Hotson Road Southwold Suffolk IP18
46 Hotson F	Road Southwold Suffolk IP18 6BP
East Dene 4 IP18 6BP	48 Hotson Road Southwold Suffolk
2 Lorne Roa	ad Southwold Suffolk IP18 6EP
Studio Cotta Suffolk IP18	age 4A Lorne Road Southwold 3 GEP
4 Lorne Roa	ad Southwold Suffolk IP18 6EP
The Snug 5 6EP	Lorne Road Southwold Suffolk IP18
8 Lorne Roa	ad Southwold Suffolk IP18 6EP
9B Lorne Ro	oad Southwold Suffolk IP18 6EP
9 Lorne Roa	ad Southwold Suffolk IP18 6EP
11 Lorne Ro	oad Southwold Suffolk IP18 6EP
	oad Southwold Suffolk IP18 6EP
Barley Cotta	age 13 Lorne Road Southwold 3 GEP
	Road Southwold Suffolk IP18 6EP
15B Lorne F	Road Southwold Suffolk IP18 6EP
	oad Southwold Suffolk IP18 6EP
	oad Southwold Suffolk IP18 6EP
	e 1 Manor Farm Close Southwold
	rm Close Southwold Suffolk IP18 6DL
	rm Close Southwold Suffolk IP18 6DL
	rk Road Southwold Suffolk IP18 6AF
	rk Road Southwold Suffolk IP18 6AF
	irk Road Southwold Suffolk IP18 6AF
	Place Southwold Suffolk IP18 6ED
1 I/// 41 R DT F	
2A Marlbor 6LR	ough Road Southwold Suffolk IP18 ugh Road Southwold Suffolk IP18

4 Marlborough Road Southwold Suffolk IP18 6LR
6 Marlborough Road Southwold Suffolk IP18 6LR
8 Marlborough Road Southwold Suffolk IP18 6LR
10 Marlborough Road Southwold Suffolk IP18 6LR
12A Marlborough Road Southwold Suffolk IP18 6LR
12 Marlborough Road Southwold Suffolk IP18 6LR
15 Marlborough Road Southwold Suffolk IP18 6LR
19 Marlborough Road Southwold Suffolk IP18 6LR
21 Marlborough Road Southwold Suffolk IP18 6LR
23 Marlborough Road Southwold Suffolk IP18 6LR
25 Marlborough Road Southwold Suffolk IP18 6LR
29 Marlborough Road Southwold Suffolk IP18 6LR
31 Marlborough Road Southwold Suffolk IP18 6LR
35 Marlborough Road Southwold Suffolk IP18 6LR
37 Marlborough Road Southwold Suffolk IP18 6LR
Tricorne House 39 Marlborough Road Southwold Suffolk IP18 6LR
57A Marlborough Road Southwold Suffolk IP18 6BT
Froxfield 59 Marlborough Road Southwold Suffolk IP18 6BJ
Seashore 61 Marlborough Road Southwold Suffolk IP18 6BJ
63 Marlborough Road Southwold Suffolk IP18 6BJ
65 Marlborough Road Southwold Suffolk IP18 6BJ
67 Marlborough Road Southwold Suffolk IP18 6BJ
69 Marlborough Road Southwold Suffolk IP18 6BJ
71 Marlborough Road Southwold Suffolk IP18 6BJ
73 Marlborough Road Southwold Suffolk IP18 6BJ
1 Mill Lane Southwold Suffolk IP18 6HW
The Old Chapel 5 Mill Lane Southwold Suffolk IP18 6HW
6 Mill Lane Southwold Suffolk IP18 6HW
8 Mill Lane Southwold Suffolk IP18 6HW

	1
10 Mill Lane Southwold Suffolk IP18 6HW	71A North Road Southwold Suffolk IP18 6BH
1 North Green Southwold Suffolk IP18 6AT	The Turrets 71 North Road Southwold Suffolk
2 North Green Southwold Suffolk IP18 6AT	IP18 6BH
Well Cottage 3 North Green Southwold Suffolk	72 North Road Southwold Suffolk IP18 6BH
IP18 6AT	1A Park Lane Southwold Suffolk IP18 6HL
4 North Green Southwold Suffolk IP18 6AT	2 Park Lane Southwold Suffolk IP18 6HL
5 North Green Southwold Suffolk IP18 6AT	3 Park Lane Southwold Suffolk IP18 6HL
6 North Green Southwold Suffolk IP18 6AT	4 Park Lane Southwold Suffolk IP18 6HL
7 North Green Southwold Suffolk IP18 6AT	5 Park Lane Southwold Suffolk IP18 6HL
8 North Green Southwold Suffolk IP18 6AT	6 Park Lane Southwold Suffolk IP18 6HL
9 North Green Southwold Suffolk IP18 6AT	7 Park Lane Southwold Suffolk IP18 6HL
1 North Parade Southwold Suffolk IP18 6LP	8 Park Lane Southwold Suffolk IP18 6HL
2 North Parade Southwold Suffolk IP18 6LP	9 - 11 Park Lane Southwold Suffolk IP18 6HL
3 North Parade Southwold Suffolk IP18 6LP	10 Park Lane Southwold Suffolk IP18 6HL
4 North Parade Southwold Suffolk IP18 6LP	12 Park Lane Southwold Suffolk IP18 6HL
5 North Parade Southwold Suffolk IP18 6LP	13 Park Lane Southwold Suffolk IP18 6HL
8 North Parade Southwold Suffolk IP18 6LP	15 Park Lane Southwold Suffolk IP18 6HL
10 North Parade Southwold Suffolk IP18 6LP	16 Park Lane Southwold Suffolk IP18 6HL
The Mount 14 North Parade Southwold Suffolk	17 Park Lane Southwold Suffolk IP18 6HL
IP18 6LT	19 Park Lane Southwold Suffolk IP18 6HL
15A North Parade Southwold Suffolk IP18 6LT	20 Park Lane Southwold Suffolk IP18 6HL
15 North Parade Southwold Suffolk IP18 6LT	21 Park Lane Southwold Suffolk IP18 6HL
16 North Parade Southwold Suffolk IP18 6LT	22 Park Lane Southwold Suffolk IP18 6HL
17 North Parade Southwold Suffolk IP18 6LT	23 Park Lane Southwold Suffolk IP18 6HL
18 North Parade Southwold Suffolk IP18 6LT	24 Park Lane Southwold Suffolk IP18 6HL
19A North Parade Southwold Suffolk IP18 6LT	Strickland House 25 Park Lane Southwold
19B North Parade Southwold Suffolk IP18 6LT	Suffolk IP18 6HL
20 North Parade Southwold Suffolk IP18 6LT	26 Park Lane Southwold Suffolk IP18 6HL
21 North Parade Southwold Suffolk IP18 6LT	27 Park Lane Southwold Suffolk IP18 6HL
24 North Parade Southwold Suffolk IP18 6LT	28 Park Lane Southwold Suffolk IP18 6HL
25 North Parade Southwold Suffolk IP18 6LT	49 Pier Avenue Southwold Suffolk IP18 6BU
27A North Parade Southwold Suffolk IP18 6LT	Craven Cottage 51 Pier Avenue Southwold
27B North Parade Southwold Suffolk IP18 6LT	Suffolk IP18 6BU
28 North Parade Southwold Suffolk IP18 6LT	53 Pier Avenue Southwold Suffolk IP18 6BL
1 North Road Southwold Suffolk IP18 6BG	55 Pier Avenue Southwold Suffolk IP18 6BL
3 North Road Southwold Suffolk IP18 6BG	Marram House 60 Pier Avenue Southwold
5 North Road Southwold Suffolk IP18 6BG	Suffolk IP18 6BU
7 North Road Southwold Suffolk IP18 6BG	Ellesborough House 62 Pier Avenue Southwold
9 North Road Southwold Suffolk IP18 6BG	Suffolk IP18 6BU
11 North Road Southwold Suffolk IP18 6BG	64 Pier Avenue Southwold Suffolk IP18 6BU
13 North Road Southwold Suffolk IP18 6BG	66 Pier Avenue Southwold Suffolk IP18 6BU
15 North Road Southwold Suffolk IP18 6BG	68 Pier Avenue Southwold Suffolk IP18 6BU
17 North Road Southwold Suffolk IP18 6BG	72 Pier Avenue Southwold Suffolk IP18 6BL
19 North Road Southwold Suffolk IP18 6BG	Catton House 74 Pier Avenue Southwold Suffolk
21 North Road Southwold Suffolk IP18 6BG	IP18 6BL
23 North Road Southwold Suffolk IP18 6BG	76 Pier Avenue Southwold Suffolk IP18 6BL
25 North Road Southwold Suffolk IP18 6BG	Town House 78A Pier Avenue Southwold Suffolk
27 North Road Southwold Suffolk IP18 6BG	IP18 6BL
29 North Road Southwold Suffolk IP18 6BG	78B Pier Avenue Southwold Suffolk IP18 6BL
Boreas House 66A North Road Southwold	Two Ways 78 Pier Avenue Southwold Suffolk
Suffolk IP18 6BH	IP18 6BL
66 North Road Southwold Suffolk IP18 6BH	1 Pinkneys Lane Southwold Suffolk IP18 6EW
Seascape 68 North Road Southwold Suffolk IP18 6BH	Dreamers Cottage 3 Pinkneys Lane Southwold Suffolk IP18 6EW
70 North Road Southwold Suffolk IP18 6BH	4 Pinkneys Lane Southwold Suffolk IP18 6EW
VO MOLITI VOGO SOUTHWOIG SUHOIK INTS ORU	

5 Pinkneys Lane Southwold Suffolk IP18 6EW
7 Pinkneys Lane Southwold Suffolk IP18 6EW
1 Queen Street Southwold Suffolk IP18 6EQ
3 Queen Street Southwold Suffolk IP18 6EQ
7 Queen Street Southwold Suffolk IP18 6EQ
10 Queen Street Southwold Suffolk IP18 6EQ
12 Queen Street Southwold Suffolk IP18 6EQ
16 Queen Street Southwold Suffolk IP18 6EQ
2 Queens Road Southwold Suffolk IP18 6HG
10 Queens Road Southwold Suffolk IP18 6HG
Dragon Cottage 12 Queens Road Southwold
Suffolk IP18 6HG
14 Queens Road Southwold Suffolk IP18 6HG
1 Salisbury Road Southwold Suffolk IP18 6LG
2 Salisbury Road Southwold Suffolk IP18 6LG
3 Salisbury Road Southwold Suffolk IP18 6LG
5 Salisbury Road Southwold Suffolk IP18 6LG
7 Salisbury Road Southwold Suffolk IP18 6LG
9 Salisbury Road Southwold Suffolk IP18 6LG
10 Salisbury Road Southwold Suffolk IP18 6LG
Westbury House 5 South Green Southwold
Suffolk IP18 6EU
Gingers House Park Lane Southwold Suffolk
IP18 6HL
10A South Green Southwold Suffolk IP18 6ET
South House 12 South Green Southwold Suffolk
IP18 6ET
13 South Green Southwold Suffolk IP18 6EU
15 South Green Southwold Suffolk IP18 6EU
16 South Green Southwold Suffolk IP18 6HB
17 South Green Southwold Suffolk IP18 6EZ
18A South Green Southwold Suffolk IP18 6HB
Acton Lodge 18 South Green Southwold Suffolk
IP18 6HB
19 South Green Southwold Suffolk IP18 6EZ
20 South Green Southwold Suffolk IP18 6HB
21 South Green Southwold Suffolk IP18 6EZ
23 South Green Southwold Suffolk IP18 6EZ
25 South Green Southworld Suffolk IP18 6EZ
26 South Green Southwold Suffolk IP18 6HB
Hill House 27 South Green Southwold Suffolk
IP18 6EZ
28A South Green Southwold Suffolk IP18 6HB
28 South Green Southwold Suffolk IP18 6HB
Bonsey House 30 South Green Southwold
Suffolk IP18 6HB
7 Spinners Lane Southwold Suffolk IP18 6AR
8 Spinners Lane Southwold Suffolk IP18 6AR
9 Spinners Lane Southwold Suffolk IP18 6AR
1 St Edmunds Road Southwold Suffolk IP18 6LB
3 St Edmunds Road Southwold Suffolk IP18 6LB
4 St Edmunds Road Southwold Suffolk IP18 6LB
5 St Edmunds Road Southwold Suffolk IP18 6LB
6 St Edmunds Road Southwold Suffolk IP18 6LB
7 St Edmunds Road Southwold Suffolk IP18 6LB
. St. Lamanas mada soddi wold sullolk ii 10 OLD

8 St Edmunds Road Southwold Suffolk IP18 6LB
9 St Edmunds Road Southwold Suffolk IP18 6LB
11 St Edmunds Road Southwold Suffolk IP18 6LB
13 St Edmunds Road Southwold Suffolk IP18 6LB
15 St Edmunds Road Southwold Suffolk IP18 6LB
17 St Edmunds Road Southwold Suffolk IP18 6LB
19 St Edmunds Road Southwold Suffolk IP18 6LB
21 St Edmunds Road Southwold Suffolk IP18 6LB
23 St Edmunds Road Southwold Suffolk IP18 6LB
25 St Edmunds Road Southwold Suffolk IP18 6LB
27 St Edmunds Road Southwold Suffolk IP18 6LB
29 St Edmunds Road Southwold Suffolk IP18 6LB
31 St Edmunds Road Southwold Suffolk IP18 6LB
3 St James Green Southwold Suffolk IP18 6JL
4 St James Green Southwold Suffolk IP18 6JL
5 St James Green Southwold Suffolk IP18 6JL
6 St James Green Southwold Suffolk IP18 6JL
7 St James Green Southwold Suffolk IP18 6JL
9A St James Green Southwold Suffolk IP18 6JL
Lighthouse Loft 9B St James Green Southwold Suffolk IP18 6JL
Caithness House 9 St James Green Southwold Suffolk IP18 6JL
10 St James Green Southwold Suffolk IP18 6JL
11 St James Green Southwold Suffolk IP18 6JL
12 St James Green Southwold Suffolk IP18 6JL
Dutchmans 14 St James Green Southwold Suffolk IP18 6JL
The Nest 15 St James Green Southwold Suffolk IP18 6JL
16 St James Green Southwold Suffolk IP18 6JL
17 St James Green Southwold Suffolk IP18 6JL
18 St James Green Southwold Suffolk IP18 6JL
The Way 19 St James Green Southwold Suffolk
IP18 6JL 20 St James Green Southwold Suffolk IP18 6JL
26 St James Green Southwold Suffolk IP18 6JL 28 St James Green Southwold Suffolk IP18 6JL
3 Station Road Southwold Suffolk IP18 6AX
7 Station Road Southwold Suffolk IP18 6AX
9A Hurren Terrace Station Road Southwold
Suffolk IP18 6BY
11 Station Road Southwold Suffolk IP18 6AX
13 Station Road Southwold Suffolk IP18 6AX

21 Station Road Southwold Suffolk IP18 6AX 22 Station Road Southwold Suffolk IP18 6AY 23 Station Road Southwold Suffolk IP18 6AX
23 Station Road Southwold Suffolk IP18 6AX
24 Station Road Southwold Suffolk IP18 6AY
25 Station Road Southwold Suffolk IP18 6AX
26 Station Road Southwold Suffolk IP18 6AY
27 Station Road Southwold Suffolk IP18 6AX
28 Station Road Southwold Suffolk IP18 6AY
29 Station Road Southwold Suffolk IP18 6AX
31 Station Road Southwold Suffolk IP18 6AX
1 Stradbroke Road Southwold Suffolk IP18 6LW
3 Stradbroke Road Southwold Suffolk IP18 6LW
Trinity Four 5A Stradbroke Road Southwold
Suffolk IP18 6LL
5 Stradbroke Road Southwold Suffolk IP18 6LL
Stradbroke Cottage 6 Stradbroke Road
Southwold Suffolk IP18 6LQ
7 Stradbroke Road Southwold Suffolk IP18 6LL
8 Stradbroke Road Southwold Suffolk IP18 6LQ
9 Stradbroke Road Southwold Suffolk IP18 6LL
10 Stradbroke Road Southwold Suffolk IP18 6LQ
11 Stradbroke Road Southwold Suffolk IP18 6LL
12A Stradbroke Road Southwold Suffolk IP18
6LQ
12B Stradbroke Road Southwold Suffolk IP18
6LQ
12C Stradbroke Road Southwold Suffolk IP18
6LQ
12 Stradbroke Road Southwold Suffolk IP18 6LQ
13 Stradbroke Road Southwold Suffolk IP18 6LL
14A Stradbroke Road Southwold Suffolk IP18
6LQ
15 Stradbroke Road Southwold Suffolk IP18 6LL
17 Stradbroke Road Southwold Suffolk IP18 6LL
20 Stradbroke Road Southwold Suffolk IP18 6LQ
21 Stradbroke Road Southwold Suffolk IP18 6LQ
22 Stradbroke Road Southwold Suffolk IP18 6LQ
23 Stradbroke Road Southwold Suffolk IP18 6LQ
25 Stradbroke Road Southwold Suffolk IP18 6LQ
27 Stradbroke Road Southwold Suffolk IP18 6LQ
28 Stradbroke Road Southwold Suffolk IP18 6LQ
29 Stradbroke Road Southwold Suffolk IP18 6LQ
30 Stradbroke Road Southwold Suffolk IP18 6LQ
31 Stradbroke Road Southwold Suffolk IP18 6LQ
32 Stradbroke Road Southwold Suffolk IP18 6LQ
33 Stradbroke Road Southwold Suffolk IP18 6LQ
35 Stradbroke Road Southwold Suffolk IP18 6LQ
36 Stradbroke Road Southwold Suffolk IP18 6LQ
37 Stradbroke Road Southwold Suffolk IP18 6LQ
38 Stradbroke Road Southwold Suffolk IP18 6LQ
39 Stradbroke Road Southwold Suffolk IP18 6LQ
40 Stradbroke Road Southwold Suffolk IP18 6LQ
41 Stradbroke Road Southwold Suffolk IP18 6LQ
43 Stradbroke Road Southwold Suffolk IP18 6LQ
45 Stradbroke Road Southwold Suffolk IP18 6LQ

46 Stradbroke Road Southwold Suffolk IP18 6LQ 48A Stradbroke Road Southwold Suffolk IP18 6LQ 48 Stradbroke Road Southwold Suffolk IP18 6LQ 50 Stradbroke Road Southwold Suffolk IP18 6LQ 52 Stradbroke Road Southwold Suffolk IP18 6LQ 54 Stradbroke Road Southwold Suffolk IP18 6LQ 56 Stradbroke Road Southwold Suffolk IP18 6LQ 58 Stradbroke Road Southwold Suffolk IP18 6LQ 60 Stradbroke Road Southwold Suffolk IP18 6LQ 62 Stradbroke Road Southwold Suffolk IP18 6LQ 64 Stradbroke Road Southwold Suffolk IP18 6LQ 66 Stradbroke Road Southwold Suffolk IP18 6LQ 68 Stradbroke Road Southwold Suffolk IP18 6LQ 70 Stradbroke Road Southwold Suffolk IP18 6LQ 72 Stradbroke Road Southwold Suffolk IP18 6LQ 74 Stradbroke Road Southwold Suffolk IP18 6LQ 76 Stradbroke Road Southwold Suffolk IP18 6LQ 78 Stradbroke Road Southwold Suffolk IP18 6LQ 80 Stradbroke Road Southwold Suffolk IP18 6LQ 1 Strickland Place Southwold Suffolk IP18 6HN Anfield House 2 Strickland Place Southwold Suffolk IP18 6HN Sun Cottage 1 Trinity Close Southwold Suffolk **IP18 6JS** 2B Trinity Street Southwold Suffolk IP18 6JH 2 Trinity Street Southwold Suffolk IP18 6JH 11 Trinity Street Southwold Suffolk IP18 6JH 2 Victoria Street Southwold Suffolk IP18 6HZ 6 Victoria Street Southwold Suffolk IP18 6HZ 7 Victoria Street Southwold Suffolk IP18 6HZ 8 Victoria Street Southwold Suffolk IP18 6HZ 12 Victoria Street Southwold Suffolk IP18 6JF 14 Victoria Street Southwold Suffolk IP18 6JF 15 Victoria Street Southwold Suffolk IP18 6HZ 17 Victoria Street Southwold Suffolk IP18 6HZ 19 Victoria Street Southwold Suffolk IP18 6HZ 21 Victoria Street Southwold Suffolk IP18 6HZ 25 Victoria Street Southwold Suffolk IP18 6HZ 26 Victoria Street Southwold Suffolk IP18 6JF 29 Victoria Street Southwold Suffolk IP18 6HZ 30 Victoria Street Southwold Suffolk IP18 6JF Hope Cottage 31 Victoria Street Southwold Suffolk IP18 6HZ 32 Victoria Street Southwold Suffolk IP18 6JF 33 Victoria Street Southwold Suffolk IP18 6HZ 34A Victoria Street Southwold Suffolk IP18 6JQ 34B Victoria Street Southwold Suffolk IP18 6JQ 34 Victoria Street Southwold Suffolk IP18 6JQ 35 Victoria Street Southwold Suffolk IP18 6HZ 36 Victoria Street Southwold Suffolk IP18 6JQ 37 Victoria Street Southwold Suffolk IP18 6HZ 38 Victoria Street Southwold Suffolk IP18 6JQ Caterer House 39A Victoria Street Southwold Suffolk IP18 6JF

39 Victoria Street Southwold Suffolk IP18 6JF 41 Victoria Street Southwold Suffolk IP18 6JF 42 Victoria Street Southwold Suffolk IP18 6JQ 46 Victoria Street Southwold Suffolk IP18 6JQ
42 Victoria Street Southwold Suffolk IP18 6JQ
6 Victoria Street Southwold Suffolk IP18 6JQ
50 Victoria Street Southwold Suffolk IP18 6JQ
ong Shoremans Cottage 54 Victoria Street
Southwold Suffolk IP18 6JQ
66 Victoria Street Southwold Suffolk IP18 6JQ
50A Victoria Street Southwold Suffolk IP18 6JQ
New Place 60 Victoria Street Southwold Suffolk P18 6JQ
62 Victoria Street Southwold Suffolk IP18 6JQ
54 Victoria Street Southwold Suffolk IP18 6JQ
66 Victoria Street Southwold Suffolk IP18 6JQ
Avocet Cottage 70 Victoria Street Southwold Suffolk IP18 6JQ
71 Victoria Street Southwold Suffolk IP18 6JQ
72 Victoria Street Southwold Suffolk IP18 6JQ
73 Victoria Street Southwold Suffolk IP18 6JQ
The Shambles 74 Victoria Street Southwold
Suffolk IP18 6JQ
75 Victoria Street Southwold Suffolk IP18 6JQ
76 Victoria Street Southwold Suffolk IP18 6JQ
77 Victoria Street Southwold Suffolk IP18 6JQ
Brick House 79 Victoria Street Southwold
Suffolk IP18 6JQ
31 Victoria Street Southwold Suffolk IP18 6JQ
35 Victoria Street Southwold Suffolk IP18 6JQ
37 Victoria Street Southwold Suffolk IP18 6JQ
91 Victoria Street Southwold Suffolk IP18 6JQ
1 Wymering Road Southwold Suffolk IP18 6AG
2 Wymering Road Southwold Suffolk IP18 6AG
3 Wymering Road Southwold Suffolk IP18 6AG
Wymering Road Southwold Suffolk IP18 6AG
Wymering Road Southwold Suffolk IP18 6AG
Wymering Road Southwold Suffolk IP18 6AG
Wymering Road Southwold Suffolk IP18 6AG
8 Wymering Road Southwold Suffolk IP18 6AG
9 Wymering Road Southwold Suffolk IP18 6AG
11 Wymering Road Southwold Suffolk IP18 6AG
12 Wymering Road Southwold Suffolk IP18 6AG
L York Road Southwold Suffolk IP18 6AN
5 York Road Southwold Suffolk IP18 6AN
7 York Road Southwold Suffolk IP18 6AN
9 York Road Southwold Suffolk IP18 6AN
L1 York Road Southwold Suffolk IP18 6AN
13 York Road Southwold Suffolk IP18 6AN
L5 York Road Southwold Suffolk IP18 6AN
17 York Road Southwold Suffolk IP18 6AN
19 York Road Southwold Suffolk IP18 6AN
Rutland Cottage Bank Alley Southwold Suffolk P18 6JD
Martyn Lodge 1 Blackmill Road Southwold

1 Stanley Cottages Blyth Road Southwold Suffolk IP18 6BA
2 Stanley Cottages Blyth Road Southwold Suffolk IP18 6BA
3 Stanley Cottages Blyth Road Southwold Suffolk IP18 6BA
Ashleigh Constitution Hill Southwold Suffolk IP18 6HE
Iona Cottage Constitution Hill Southwold Suffolk IP18 6HE
Lydstep House Constitution Hill Southwold Suffolk IP18 6HE
Staffa Cottage Constitution Hill Southwold Suffolk IP18 6HE
Tamarisk Constitution Hill Southwold Suffolk IP18 6HE
Bligh Cottage Cumberland Close Southwold Suffolk IP18 6JR
22 Cumberland Road Southwold Suffolk IP18 6JP
Corner Cottage Cumberland Road Southwold Suffolk IP18 6LF
Compass Point Cumberland Road Southwold Suffolk IP18 6LF
Wych Elm Cottage 1 East Green Southwold Suffolk IP18 6JN
Flat 1 5 East Street Southwold Suffolk IP18 6EH
Flat 2 5 East Street Southwold Suffolk IP18 6EH
Puddle Cottage 6 East Street Southwold Suffolk IP18 6EH
16 East Street Southwold Suffolk IP18 6EH
Cobblestones 20 East Street Southwold Suffolk IP18 6EH
The Boathouse 4 Ferry Road Southwold Suffolk IP18 6HQ
Gun Hill Bight 8 Ferry Road Southwold Suffolk IP18 6HQ
Coniston Field Stile Road Southwold Suffolk IP18 6LA
Good Hope Field Stile Road Southwold Suffolk IP18 6LA
Osada Field Stile Road Southwold Suffolk IP18 6LA
St Edmunds Field Stile Road Southwold Suffolk IP18 6LA
White House Field Stile Road Southwold Suffolk IP18 6LX
1 Darwin Court Field Stile Road Southwold Suffolk IP18 6LY
2 Darwin Court Field Stile Road Southwold Suffolk IP18 6LY
3 Darwin Court Field Stile Road Southwold Suffolk IP18 6LY
Centenary Cottage Gardner Road Southwold Suffolk IP18 6HJ

Ferry Cottage Gardner Road Southwold Suffolk IP18 6HH	Little Elms Mill Lane Southwold Suffolk IP18 6HW
The Vicarage Gardner Road Southwold Suffolk IP18 6HJ	Millway Cottage Mill Lane Southwold Suffolk IP18 6HW
Stable Cottage 1 Fox Yard Southwold Suffolk IP18 6HS	Pinkneys Way Mill Lane Southwold Suffolk IP18 6HW
2 Fox Yard Southwold Suffolk IP18 6HS	Rest Cottage Mill Lane Southwold Suffolk IP18
3 Fox Yard Southwold Suffolk IP18 6HS	6HW
4 Fox Yard Southwold Suffolk IP18 6HS	Stable House Mill Lane Southwold Suffolk IP18
5 Fox Yard Southwold Suffolk IP18 6HS	6HW
Windles 1 Godyll Road Southwold Suffolk IP18 6AJ	The Gatehouse Mill Lane Southwold Suffolk IP18 6HW
2A High Street Southwold Suffolk IP18 6AE	1A Mill Lane Southwold Suffolk IP18 6HW
19 High Street Southwold Suffolk IP18 6AS	Thyme Cottage Mill Lane Southwold Suffolk
24A High Street Southwold Suffolk IP18 6AE	IP18 6HW
Flat 1 41 High Street Southwold Suffolk IP18 6AB	Becketts North Green Southwold Suffolk IP18 6AT
Flat 3 41 High Street Southwold Suffolk IP18 6AB	Burchley North Green Southwold Suffolk IP18 6AT
Flat 4 41 High Street Southwold Suffolk IP18 6AB	North Green House North Green Southwold Suffolk IP18 6AT
The Old House 49 High Street Southwold Suffolk IP18 6DJ	1 St Edmunds Court North Green Southwold Suffolk IP18 6AU
Flat 54A High Street Southwold Suffolk IP18 6DN	2 St Edmunds Court North Green Southwold Suffolk IP18 6AU
The Manor House 65 High Street Southwold Suffolk IP18 6DJ	3 St Edmunds Court North Green Southwold Suffolk IP18 6AU
The Olde Banke House 69A High Street Southwold Suffolk IP18 6DS	4 St Edmunds Court North Green Southwold Suffolk IP18 6AU
Flat 2 77 High Street Southwold Suffolk IP18 6DS	5 St Edmunds Court North Green Southwold Suffolk IP18 6AU
Flat 3 77 High Street Southwold Suffolk IP18 6DS	6 St Edmunds Court North Green Southwold Suffolk IP18 6AU
Flat 100 High Street Southwold Suffolk IP18 6DP	7 St Edmunds Court North Green Southwold
The Post Office High Street Southwold Suffolk	Suffolk IP18 6AU
IP18 6AA White Cottage 10 Lorne Road Southwold Suffolk	8 St Edmunds Court North Green Southwold Suffolk IP18 6AU
IP18 6EP	7 North Parade Southwold Suffolk IP18 6LP
1 - 3 Lorne Road Southwold Suffolk IP18 6EP	The Craighurst 11 - 13 North Parade Southwold
15 Lorne Road Southwold Suffolk IP18 6EP	Suffolk
The Elms Lorne Road Southwold Suffolk IP18 6EP	Top Floor Flat 22 North Parade Southwold Suffolk IP18 6LT
Flat 10 Market Place Southwold Suffolk IP18 6EE Swan Hotel Market Place Southwold Suffolk	Guardship North Parade Southwold Suffolk IP18 6LP
IP18 6EG	Flat 2 Strathmore House North Parade Southwold Suffolk IP18 6LT
39A Marlborough Road Southwold Suffolk IP18	Strathmore House North Parade Southwold
6LR Flat 1 Pachacter House 11 Marlhorough Poad	Suffolk
Flat 1 Rochester House 11 Marlborough Road Southwold Suffolk IP18 6LR	Hill View 67 North Road Southwold Suffolk IP18 6BH
Flat 2 Rochester House 11 Marlborough Road Southwold Suffolk IP18 6LR	Lake House North Road Southwold Suffolk IP18 6BH
Flat 3 Rochester House 11 Marlborough Road	
Southwold Suffolk IP18 6LR	The Coach House Park Lane Southwold Suffolk IP18 6HL
2 Mill Lane Southwold Suffolk IP18 6HW	IL TO OUF

Holly House 80 Pier Avenue Southwold Suffolk IP18 6BL	2 The Homestead South Green Southwold Suffolk IP18 6EX
Pier Lodge 80A Pier Avenue Southwold Suffolk IP18 6BL	3 The Homestead South Green Southwold Suffolk IP18 6EX
84 Pier Avenue Southwold Suffolk IP18 6BL Saxon House 86 Pier Avenue Southwold Suffolk	4 The Homestead South Green Southwold Suffolk IP18 6EX
IP18 6BL St Martins Pier Avenue Southwold Suffolk IP18	5 The Homestead South Green Southwold Suffolk IP18 6EX
6BL 1 Pier Court Pier Avenue Southwold Suffolk IP18	6 The Homestead South Green Southwold Suffolk IP18 6EX
6BL	2 Centre Cliff South Green Southwold Suffolk
2 Pier Court Pier Avenue Southwold Suffolk IP18 6BL	IP18 6EN 3 Centre Cliff South Green Southwold Suffolk
5A Pinkneys Lane Southwold Suffolk IP18 6EW	IP18 6EN
Jordan House Pinkneys Lane Southwold Suffolk IP18 6EW	4 Centre Cliff South Green Southwold Suffolk IP18 6EN
The Lane House Pinkneys Lane Southwold Suffolk IP18 6EW	5 Centre Cliff South Green Southwold Suffolk IP18 6EN
Fairwinds Primrose Alley Southwold Suffolk IP18	5 Spinners Lane Southwold Suffolk IP18 6AR
6HD 4 - 6 Queen Street Southwold Suffolk IP18 6EQ	Commoners Spinners Lane Southwold Suffolk IP18 6AR
Evington Queen Street Southwold Suffolk IP18 6EQ	Turnstile Cottage Spinners Lane Southwold Suffolk IP18 6AR
Garden Lodge Queens Road Southwold Suffolk IP18 6HG	Ebenezer Cottage 23 St James Green Southwold Suffolk IP18 6JL
Mayland 4 Salisbury Road Southwold Suffolk IP18 6LG	St James House St James Green Southwold Suffolk IP18 6JL
Sarum End Salisbury Road Southwold Suffolk IP18 6LG	Flat 2 Blyth House St James Green Southwold Suffolk IP18 6JL
4 South Green Southwold Suffolk IP18 6ET	Flat 3 Blyth House St James Green Southwold
6 South Green Southwold Suffolk IP18 6ET	Suffolk IP18 6JL
8 South Green Southwold Suffolk IP18 6ET	Flat 4 Blyth House St James Green Southwold
10B South Green Southwold Suffolk IP18 6ET	Suffolk IP18 6JL
22 South Green Southwold Suffolk IP18 6HB	Silver Shore Station Road Southwold Suffolk
Cannon Lodge South Green Southwold Suffolk	IP18 6AY
Hall Cottage South Green Southwold Suffolk	High Bank Station Road Southwold Suffolk IP18 6AY
IP18 6EU	Kintyre Station Road Southwold Suffolk IP18 6AY
Homestead Cottage 11 South Green Southwold Suffolk IP18 6EU	Mount View Station Road Southwold Suffolk
Cannons Gun Hill Southwold Suffolk IP18 6HB	IP18 6AY
Cannons Gun Hill Southwold Suffolk IP18 6HB	1 Crick Court Station Road Southwold Suffolk
May Place South Green Southwold Suffolk IP18	IP18 6DE 2 Crick Court Station Road Southwold Suffolk
6ER	IP18 6DE
Red Lion Inn South Green Southwold Suffolk IP18 6ET	4 Crick Court Station Road Southwold Suffolk
Regency House South Green Southwold Suffolk	IP18 6DE
IP18 6ES	5 Crick Court Station Road Southwold Suffolk IP18 6DE
The Wheel House South Green Southwold Suffolk IP18 6ET	8 Crick Court Station Road Southwold Suffolk
Woldside South Green Southwold Suffolk IP18	IP18 6DE
6EZ	9 Crick Court Station Road Southwold Suffolk IP18 6DE
1 The Homestead South Green Southwold Suffolk IP18 6EX	10 Crick Court Station Road Southwold Suffolk
JUIIUIN IF 10 ULN	IP18 6DE

P18 6DE	Suffolk IP18 6JE
12 Crick Court Station Road Southwold Suffolk P18 6DE	Flat 1 Eversley Cottage Wymering Road Southwold Suffolk IP18 6AG
13 Crick Court Station Road Southwold Suffolk P18 6DE	Flat 2 Eversley Cottage Wymering Road Southwold Suffolk IP18 6AG
14 Crick Court Station Road Southwold Suffolk P18 6DE	Sperlings Wymering Road Southwold Suffolk IP18 6AG
15 Crick Court Station Road Southwold Suffolk P18 6DE	1 Orwell Court York Road Southwold Suffolk IP18 6AN
18 Crick Court Station Road Southwold Suffolk P18 6DE	2 Orwell Court York Road Southwold Suffolk IP18 6AN
19 Crick Court Station Road Southwold Suffolk P18 6DE	3 Orwell Court York Road Southwold Suffolk IP18 6AN
20 Crick Court Station Road Southwold Suffolk P18 6DE	4 Orwell Court York Road Southwold Suffolk IP18 6AN
21 Crick Court Station Road Southwold Suffolk P18 6DE	19A Stradbroke Road Southwold Suffolk IP18 6LQ
22 Crick Court Station Road Southwold Suffolk P18 6DE	The Nook Primrose Alley Southwold Suffolk IP:
23 Crick Court Station Road Southwold Suffolk P18 6DE	Crownside 94A High Street Southwold Suffolk IP18 6DP
24 Crick Court Station Road Southwold Suffolk P18 6DE	5 East Street Southwold Suffolk IP18 6EH Flat 7 St Barnabas Court Godyll Road Southwo
25 Crick Court Station Road Southwold Suffolk P18 6DE	Suffolk IP18 6AJ Old Bakehouse Store Blackmill Road Southwol
26 Crick Court Station Road Southwold Suffolk P18 6DE	Suffolk IP18 6AQ Toad Hall Queens Road Southwold Suffolk IP18
27 Crick Court Station Road Southwold Suffolk P18 6DE	6HG Barclays Bank 67 High Street Southwold Suffol
Frederick House 14 Stradbroke Road Southwold	IP18 6DT 68 High Street Southwold Suffolk IP18 6DW
5 Strickland Place Southwold Suffolk IP18 6HN	17 Market Place Southwold Suffolk
Four Strickland Place Southwold Suffolk IP18 5HN	Adnams And Co Plc East Green Southwold Suffolk IP18 6JW
28 Victoria Street Southwold Suffolk IP18 6JF 40 Victoria Street Southwold Suffolk IP18 6JQ	Maisonette 33 High Street Southwold Suffolk IP18 6AB
48 Victoria Street Southwold Suffolk IP18 6JQ	35 High Street Southwold Suffolk IP18 6AB
52 Victoria Street Southwold Suffolk IP18 6JQ	43 High Street Southwold Suffolk IP18 6AB
4 Victoria Street Southwold Suffolk IP18 6HZ	27 High Street Southwold Suffolk IP18 6AD
Samphire House Victoria Street Southwold	12 High Street Southwold Suffolk IP18 6AE
Suffolk IP18 6HZ	32 High Street Southwold Suffolk IP18 6AE
1 Youngs Yard Victoria Street Southwold Suffolk	40 High Street Southwold Suffolk IP18 6AE
P18 6JE 2 Youngs Yard Victoria Street Southwold Suffolk	Beehive 10 Wymering Road Southwold Suffolk IP18 6AG
P18 6JE	13 Wymering Road Southwold Suffolk IP18 6A
Peter's Place 3 Youngs Yard Victoria Street	2 York Road Southwold Suffolk IP18 6AN
Southwold Suffolk IP18 6JE	6 Spinners Lane Southwold Suffolk IP18 6AR
Peter's Place 3 Youngs Yard Victoria Street Southwold Suffolk IP18 6JE	Prospect Place 33 Station Road Southwold Suffolk IP18 6AX
4 Youngs Yard Victoria Street Southwold Suffolk	70 Pier Avenue Southwold Suffolk IP18 6BL
P18 6JE	50 Hotson Road Southwold Suffolk IP18 6BP
5 Youngs Yard Victoria Street Southwold Suffolk	45 High Street Southwold Suffolk IP18 6DJ
P18 6JE	51 High Street Southwold Suffolk IP18 6DJ

55 High Street Southwold Suffolk IP18 6DJ	2 Bank Alley Southwold Suffolk IP18 6JD
61 High Street Southwold Suffolk IP18 6DJ	1 Church Street Southwold Suffolk IP18 6JG
54 High Street Southwold Suffolk IP18 6DN	4 Church Street Southwold Suffolk IP18 6JG
58 High Street Southwold Suffolk IP18 6DN	40 Church Street Southwold Suffolk IP18 6JG
60 - 62 High Street Southwold Suffolk IP18 6DN	Thyme Cottage 44 Church Street Southwold
64 High Street Southwold Suffolk IP18 6DN	Suffolk IP18 6JG
66 High Street Southwold Suffolk IP18 6DN	7 East Green Southwold Suffolk IP18 6JN
100 High Street Southwold Suffolk IP18 6DP	8 East Green Southwold Suffolk IP18 6JN
80 High Street Southwold Suffolk IP18 6DP	44 Victoria Street Southwold Suffolk IP18 6JQ
82 High Street Southwold Suffolk IP18 6DP	58 Victoria Street Southwold Suffolk IP18 6JQ
94 High Street Southwold Suffolk IP18 6DP	68 Victoria Street Southwold Suffolk IP18 6JQ
96 High Street Southwold Suffolk IP18 6DP	11 Field Stile Road Southwold Suffolk IP18 6LD
Olde Banke House 69 High Street Southwold	17 Field Stile Road Southwold Suffolk IP18 6LD
Suffolk IP18 6DS	26 Field Stile Road Southwold Suffolk IP18 6LD
77 High Street Southwold Suffolk IP18 6DS	16 Dunwich Road Southwold Suffolk IP18 6LJ
83 High Street Southwold Suffolk IP18 6DS	Suffolk House 18 Dunwich Road Southwold
3 Market Place Southwold Suffolk IP18 6DX	Suffolk IP18 6LJ
5 Market Place Southwold Suffolk IP18 6DX	8 Dunwich Road Southwold Suffolk IP18 6LJ
7 Market Place Southwold Suffolk IP18 6DX	11 Chester Road Southwold Suffolk IP18 6LN
15 Market Place Southwold Suffolk IP18 6EA	2 Chester Road Southwold Suffolk IP18 6LN
19 Market Place Southwold Suffolk IP18 6EA	6 North Parade Southwold Suffolk IP18 6LP
23 Market Place Southwold Suffolk IP18 6ED	19 Stradbroke Road Southwold Suffolk IP18 6L
10 Market Place Southwold Suffolk IP18 6EE	Vicarys House 34 Stradbroke Road Southwold
2 Market Place Southwold Suffolk IP18 6EE	Suffolk IP18 6LQ
11 East Street Southwold Suffolk IP18 6EH	42 Stradbroke Road Southwold Suffolk IP18 6L
22 East Street Southwold Suffolk IP18 6EH	44 Stradbroke Road Southwold Suffolk IP18 6L
26 East Street Southwold Suffolk IP18 6EH	17 Marlborough Road Southwold Suffolk IP18
36 East Street Southwold Suffolk IP18 6EJ	6LR
6 Lorne Road Southwold Suffolk IP18 6EP	27 Marlborough Road Southwold Suffolk IP18
Horseshoe Cottage 7 Lorne Road Southwold	6LR
Suffolk IP18 6EP	33 Marlborough Road Southwold Suffolk IP18
6 Pinkneys Lane Southwold Suffolk IP18 6EW	6LR
9 Pinkneys Lane Southwold Suffolk IP18 6EW	22 North Parade Southwold Suffolk IP18 6LT
14 South Green Southwold Suffolk IP18 6HB	23 North Parade Southwold Suffolk IP18 6LT
24 South Green Southwold Suffolk IP18 6HB	Cranbrook Godyll Road Southwold Suffolk IP18
Mole End Queens Road Southwold Suffolk IP18	6AJ
6HG	St Barnabas Godyll Road Southwold Suffolk IP1
Tittlemouse 6 Queens Road Southwold Suffolk	6AJ
IP18 6HG	Waverley Godyll Road Southwold Suffolk IP18
8 Queens Road Southwold Suffolk IP18 6HG	6AJ
1 Park Lane Southwold Suffolk IP18 6HL	Cratfield House 45A High Street Southwold
14 Park Lane Southwold Suffolk IP18 6HL	Suffolk IP18 6DJ
Wellesley House 3 Strickland Place Southwold	80A High Street Southwold Suffolk IP18 6DP
Suffolk IP18 6HN	88 High Street Southwold Suffolk IP18 6DP
4 Strickland Place Southwold Suffolk IP18 6HN	73A High Street Southwold Suffolk IP18 6DS
Liscarrol 6 Strickland Place Southwold Suffolk	Flat 1 77 High Street Southwold Suffolk IP18
IP18 6HN	6DS
3 Mill Lane Southwold Suffolk IP18 6HW	The Crows Nest 81A High Street Southwold
4 Mill Lane Southwold Suffolk IP18 6HW	Suffolk IP18 6DS
7 Mill Lane Southwold Suffolk IP18 6HW	7A Market Place Southwold Suffolk IP18 6DX
13 Victoria Street Southwold Suffolk IP18 6HZ	Coign Constitution Hill Southwold Suffolk IP18
Ceilidh Cottage 23 Victoria Street Southwold	6НЕ
Suffolk IP18 6HZ	Vergers House 38A Cumberland Close
27 Victoria Street Southwold Suffolk IP18 6HZ	Southwold Suffolk IP18 6JR
5 Victoria Street Southwold Suffolk IP18 6HZ	

IP18 6LD	Suffolk IP18 6EX
Rodings Salisbury Road Southwold Suffolk IP18 6LG	Stable Cottage North Green Southwold Suffolk IP18 6AT
Balmore Cottage 1A Chester Road Southwold	1 South Green Southwold Suffolk IP18 6ES
Suffolk IP18 6LN Garden Cottage 26B North Parade Southwold	Hillcrest 3 Gardner Road Southwold Suffolk IP1
Suffolk IP18 6LT	The Haven 3 Trinity Close Southwold Suffolk
Eversley Cottage Wymering Road Southwold	IP18 6JS
Suffolk IP18 6AG Westholme Godyll Road Southwold Suffolk IP18	3 Pier Court Pier Avenue Southwold Suffolk IP1 6BL
6AJ Openview Godyll Road Southwold Suffolk IP18	4 Pier Court Pier Avenue Southwold Suffolk IP1 6BL
6AJ	Flat 21 Market Place Southwold Suffolk IP18
Openview Godyll Road Southwold Suffolk IP18 6AJ	6ED British Red Cross Society Gardner Road
Barnaby Lodge Godyll Road Southwold Suffolk	Southwold Suffolk IP18 6HJ
IP18 6AJ	54A High Street Southwold Suffolk IP18 6DN
Forest Lodge Godyll Road Southwold Suffolk	84 - 86 High Street Southwold Suffolk IP18 6DP
IP18 6AJ Langford Lodge Godyll Road Southwold Suffolk	The Old Royal 20 Victoria Street Southwold Suffolk IP18 6JF
IP18 6AJ	Flat 1 Strathmore House North Parade
Mill Cottage Godyll Road Southwold Suffolk	Southwold Suffolk IP18 6LT
IP18 6AJ	1 Buckenham Court Southwold Suffolk IP18 6J
Ropewalk Cottage Spinners Lane Southwold	2 Buckenham Court Southwold Suffolk IP18 6J
Suffolk IP18 6AR	3 Buckenham Court Southwold Suffolk IP18 6J
Spinners Cottage Spinners Lane Southwold	4 Buckenham Court Southwold Suffolk IP18 6J
Suffolk IP18 6AR	Southwold Delivery Office Manor Park Road
Upper East Lodge East Street Southwold Suffolk	Southwold Suffolk IP18 6AF
IP18 6EH	11 Market Place Southwold Suffolk IP18 6EA
South Green Lodge 10 South Green Southwold Suffolk IP18 6ET	Lower Trinity East Street Southwold Suffolk IP1 6EH
York Cliff House Primrose Alley Southwold Suffolk IP18 6HD	Flat 2 Beach House 4 East Cliff Southwold Suffolk IP18 6EL
West View 1 Gardner Road Southwold Suffolk	Park View Gardner Road Southwold Suffolk IP1
IP18 6HJ	6HJ
St Edmunds Hall Cumberland Road Southwold	White Point Eversley Road Southwold Suffolk
Suffolk IP18 6JP	Flat 3 St Barnabas Court Godyll Road Southwol
Stepping Stone Cottage Cumberland Close Southwold Suffolk IP18 6JR	Suffolk IP18 6AJ
Lantern Cottage 4 Trinity Close Southwold	Flat 4 St Barnabas Court Godyll Road Southwol Suffolk IP18 6AJ
Suffolk IP18 6JS	Flat 5 St Barnabas Court Godyll Road Southwol
Willow Cottage 2 Trinity Close Southwold Suffolk IP18 6JS	Suffolk IP18 6AJ
Wyvern Cottage Field Stile Road Southwold	Flat 6 St Barnabas Court Godyll Road Southwol Suffolk IP18 6AJ
Suffolk IP18 6LD Ealing Cottage Field Stile Road Southwold	Blyth Hotel Station Road Southwold Suffolk IP1 6AY
Suffolk IP18 6LD Merton Cottage Field Stile Road Southwold	Crown Hotel 90 High Street Southwold Suffolk
Suffolk IP18 6LD	IP18 6DP Southwold Cp School Cumberland Road
Links Cottage Godyll Road Southwold Suffolk IP18 6AJ	Southwold Suffolk IP18 6JP
Rowan Cottage Constitution Hill Southwold	Lower East Lodge East Street Southwold Suffol IP18 6EH
Suffolk IP18 6HE Flat 2 West 2 Market Place Southwold Suffolk	Ogilvie House York Road Southwold Suffolk IP1 6AN

98 High Street Southwold Suffolk IP18 6DP	Surf 39B High Street Southwold Suffolk IP18
Holly Lodge Constitution Hill Southwold Suffolk	6AB
IP18 6HE	41 High Street Southwold Suffolk IP18 6AB
9 Trinity Street Southwold Suffolk	Manor Gate 65A High Street Southwold Suffolk
75 High Street Southwold Suffolk IP18 6DS	IP18 6DJ
81 High Street Southwold Suffolk IP18 6DS	73 High Street Southwold Suffolk IP18 6DS
76 High Street Southwold Suffolk IP18 6DN	Masonic Lodge Manor Park Road Southwold
63 High Street Southwold Suffolk IP18 6DJ	Suffolk IP18 6AF
70 High Street Southwold Suffolk IP18 6DN	3A Childs Yard Market Place Southwold Suffolk
Flat 1 Sunset House Godyll Road Southwold	IP18 6DZ
Suffolk IP18 6AJ	2 St Edmunds Road Southwold Suffolk IP18 6LB
Flat 2 Sunset House Godyll Road Southwold	Unit 15 Southwold Business Centre St Edmunds
Suffolk IP18 6AJ	Road Southwold Suffolk IP18 6JU
Flat 3 Sunset House Godyll Road Southwold	Unit 17 Southwold Business Centre St Edmunds
Suffolk IP18 6AJ	Road Southwold Suffolk IP18 6JU
Forest Cottage Blackmill Road Southwold	1 St James Green Southwold Suffolk IP18 6JL
Suffolk IP18 6AQ	9A Station Road Southwold Suffolk IP18 6AX
27B High Street Southwold Suffolk IP18 6AD	9 - 11 Victoria Street Southwold Suffolk IP18
40A High Street Southwold Suffolk IP18 6AE	6HZ
38 High Street Southwold Suffolk IP18 6AE	Adnams Store Victoria Street Southwold Suffolk
Top Flat Lorne House 2 High Street Southwold	IP18 6JF
Suffolk IP18 6AE	Farview Blackmill Road Southwold Suffolk IP18
Bottom Flat Lorne House 2 High Street	6AQ
Southwold Suffolk IP18 6AE	Stanley Cottages Blyth Road Southwold Suffolk
15 Station Road Southwold Suffolk IP18 6AX	IP18 6BA
Flat 71 North Road Southwold Suffolk IP18 6BH	Darwin Court Field Stile Road Southwold Suffolk
Gun Hill Cottage South Green Southwold Suffolk	IP18 6LY
IP18 6HF	St Barnabas Court Godyll Road Southwold
Dobcott Chester Road Southwold Suffolk IP18	Suffolk IP18 6AJ
6LN	Sunset House Godyll Road Southwold Suffolk
Dobcott Chester Road Southwold Suffolk IP18	IP18 6AJ
6LN	2 High Street Southwold Suffolk
Flat 1 The Craighurst 11 - 13 North Parade	1 Marlborough Road Southwold Suffolk IP18
Southwold Suffolk IP18 6LP	6LR
Flat 2 The Craighurst 11 - 13 North Parade	3 Marlborough Road Southwold Suffolk IP18
Southwold Suffolk IP18 6LP	6LR
Flat 4 The Craighurst 11 - 13 North Parade	5 Marlborough Road Southwold Suffolk IP18
Southwold Suffolk IP18 6LP	6LR
Flat 5 The Craighurst 11 - 13 North Parade	7 Marlborough Road Southwold Suffolk IP18
Southwold Suffolk IP18 6LP	6LR
Flat 6 The Craighurst 11 - 13 North Parade	Rochester House 11 Marlborough Road
Southwold Suffolk IP18 6LP	Southwold Suffolk IP18 6LR
Flat 7 The Craighurst 11 - 13 North Parade	St Edmunds Court North Green Southwold
Southwold Suffolk IP18 6LP	Suffolk IP18 6AU
Flat 8 The Craighurst 11 - 13 North Parade	Pier Court Pier Avenue Southwold Suffolk IP18
Southwold Suffolk IP18 6LP	Britanasa Cattaga Britanasa Allau Sauthurald
Southwold Library North Green Southwold	Primrose Cottage Primrose Alley Southwold
Suffolk IP18 6AT	Suffolk IP18 6HD
Adnams And Co Ltd East Green Southwold	The Homestead South Green Southwold Suffolk
Suffolk IP18 6JN	IP18 6EX
Lord Nelson Hotel 42 East Street Southwold	Southwold Suffolk IP18 6 III
Suffolk IP18 6EJ	Southwold Suffolk IP18 6JU
Reading Room Cottage East Street Southwold	Blyth House St James Green Southwold Suffolk IP18 6JL
Suffolk IP18 6EH	11 TO WE

Crick Court Station Road Southwold Suffolk IP18 6DE
Youngs Yard Victoria Street Southwold Suffolk IP18 6JE
Orwell Court York Road Southwold Suffolk IP18 6AN
2 Queen Street Southwold Suffolk IP18 6EQ
13 St James Green Southwold Suffolk IP18 6JL
2 St James Green Southwold Suffolk IP18 6JL
Rose Cottage 21 St James Green Southwold Suffolk IP18 6JL
8 St James Green Southwold Suffolk IP18 6JL
8 Queen Street Southwold Suffolk IP18 6EQ
Flat 1 Blyth House St James Green Southwold Suffolk IP18 6JL
Evington House Queen Street Southwold Suffolk IP18 6EQ
8 East Street Southwold Suffolk IP18 6EH
Basement Flat 41 High Street Southwold Suffolk IP18 6AB
12 Mill Lane Southwold Suffolk IP18 6HW
14 Mill Lane Southwold Suffolk IP18 6HW
Flat 4 Sunset House Godyll Road Southwold Suffolk IP18 6AJ

14 Queen Street Southwold Suffolk IP18 6EQ
18 Queen Street Southwold Suffolk IP18 6EQ
5 Queen Street Southwold Suffolk IP18 6EQ
May Place Cottage 7A Queen Street Southwold Suffolk IP18 6EQ
14A Queen Street Southwold Suffolk IP18 6EQ
Flat 1 St Barnabas Court Godyll Road Southwold Suffolk IP18 6AJ
Flat 15 Market Place Southwold Suffolk IP18 6EA
14A Victoria Street Southwold Suffolk IP18 6JF
Flat 1 The Post Office High Street Southwold
Suffolk IP18 6AA
Flat 2 The Post Office High Street Southwold Suffolk IP18 6AA
Flat 3 The Post Office High Street Southwold
Suffolk IP18 6AA
7 Hurren Terrace Station Road Southwold
Suffolk IP18 6BY
3 Hurren Terrace Station Road Southwold
Suffolk IP18 6BY
21 Lorne Road Southwold Suffolk IP18 6EP
21 Gardner Road Southwold Suffolk IP18 6HJ

THIS DIRECTION is made under Article 4(1) of the Order and, in accordance with paragraph 1(7) of Schedule 3, shall remain in force until October 14th 2024 and shall then expire unless it has been confirmed by the Council in accordance with paragraphs 1(9) and 1(10) of Schedule 3.



THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015

Direction Made under Article 4(1)

WANGFORD CONSERVATION AREA AMENDED AREA 2024

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

DIRECTION MADE UNDER ARTICLE 4(1)

WANGFORD CONSERVATION AREA

WHEREAS the Council of the District of East Suffolk being the appropriate Local Planning Authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order") are satisfied that it is expedient that development of the descriptions set out in the First Schedule should not be carried out within the area of land designated in the Second Schedule such land being outlined in red on the plan annexed hereto unless permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Order HEREBY DIRECTS that the permission granted by Article 3 of the Order shall not apply to the development specified in the First Schedule in respect of the land described in the Second Schedule.

For the purposes of this Direction the expression 'relevant location' (wherever it may appear) shall mean a highway, waterway or open space.

FIRST SCHEDULE

- (a) The enlargement, improvement or other alteration of a dwellinghouse, being the development comprised of Class A of Part I of Schedule 2 of the Order where any part of the enlargement, improvement or other alterations would front a relevant location.
- (b) The enlargement or alteration of a dwellinghouse consisting of an addition or alteration to its roof, being the development comprised of Class B and Class C of Part I of Schedule 2 of the Order where any such alteration would be to a roof slope which fronts a relevant location.
- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being the development comprised within Class D of Part I of Schedule 2 of the Order where any such alteration would front a relevant location.
- (d) The provision within the curtilage of the dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or a container used for domestic heating purposes for the storage of oil or liquid petroleum gas, being the development comprised within Class E of Part I of Schedule 2 of the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the

- building or enclosure maintained, improved or altered would front a relevant location.
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such; or the replacement in whole or in part of such a surface, being the development comprised within Class F of Part I of Schedule 2 of the Order where the hard surface would front a relevant location.
- (f) The installation, alteration or replacement of a chimney, flue or soil and vent pipe on a dwellinghouse, being the development comprised within Class G of Part I of Schedule 2 of the Order where any such alteration would be to a wall or roof slope which fronts a relevant location.
- (g) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being the development comprised within Class A of Part 2 of Schedule 2 of the Order where the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location.

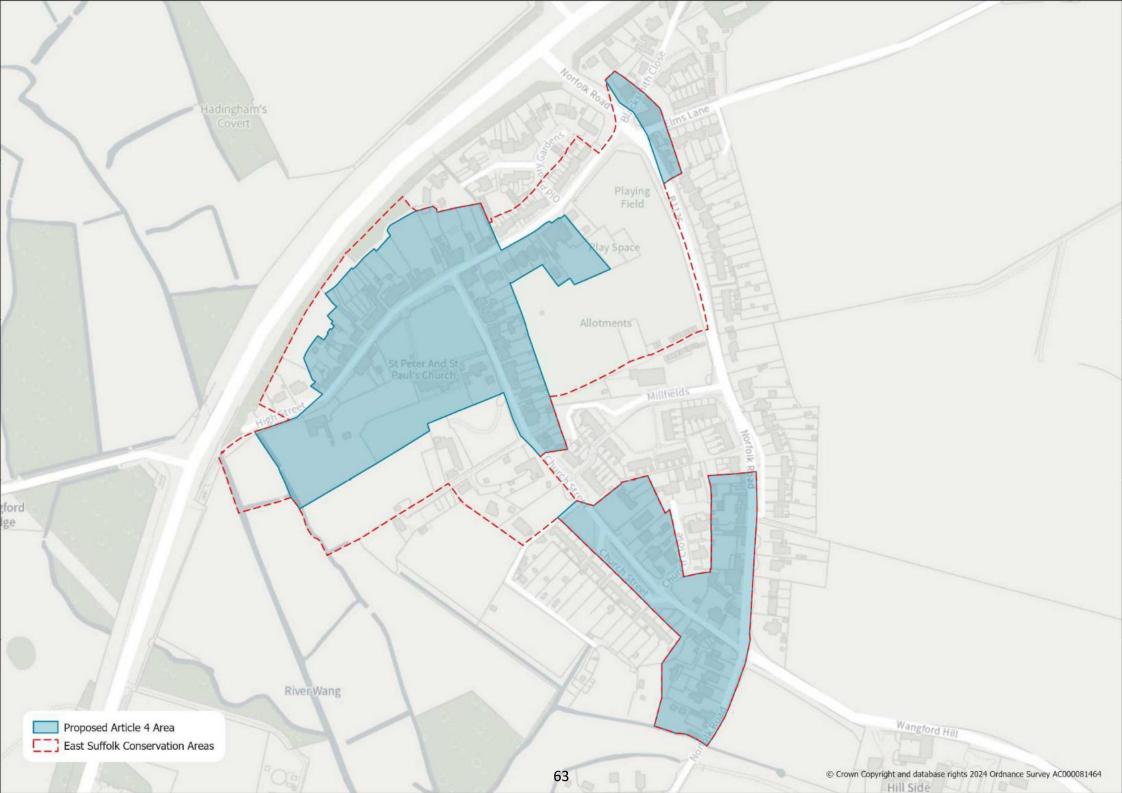
SECOND SCHEDULE

Hadfield Cottage 1 Pound Corner London Road Wangford Beccles Suffolk NR34 8AZ
Wangford Veterinary Clinic Pound Corner London Road Wangford Beccles Suffolk NR34 8AX
St Peters And St Pauls Church Church Street Wangford Suffolk
Pound Corner London Road Wangford Beccles Suffolk NR34 8AX
Little Priory Church Street Wangford Beccles Suffolk NR34 8RW
2 Pound Corner London Road Wangford Beccles Suffolk NR34 8AZ
The Stables 13A High Street Wangford Beccles Suffolk NR34 8RL
The Old Bakehouse 5A Church Street Wangford Beccles Suffolk NR34 8RW
The Old Forge Grooming Salon Pound Corner London Road Wangford Beccles Suffolk NR34 8AX
Shop At 16 High Street Wangford Beccles Suffolk NR34 8RA
Flat At The Angel Inn High Street Wangford Beccles Suffolk NR34 8RL
Harlequin House 1 Church Street Wangford Beccles Suffolk NR34 8RW
5 Church Street Wangford Beccles Suffolk NR34 8RW
17 Church Street Wangford Beccles Suffolk NR34 8RW
19 Church Street Wangford Beccles Suffolk NR34 8RW
23 Church Street Wangford Beccles Suffolk NR34 8RW
25 Church Street Wangford Beccles Suffolk NR34 8RW
35 Church Street Wangford Beccles Suffolk NR34 8RW
37 Church Street Wangford Beccles Suffolk NR34 8RW
38 Church Street Wangford Beccles Suffolk NR34 8RN
40 Church Street Wangford Beccles Suffolk NR34 8RN
42 Church Street Wangford Beccles Suffolk NR34 8RN
44 Church Street Wangford Beccles Suffolk NR34 8RN
St Edmunds House 59A Church Street Wangford Beccles Suffolk NR34 8RN
61 Church Street Wangford Beccles Suffolk NR34 8RN
63 Church Street Wangford Beccles Suffolk NR34 8RN
69 Church Street Wangford Beccles Suffolk NR34 8RN

71 Church Street Wangford Beccles Suffolk NR34 8RN
1 High Street Wangford Beccles Suffolk NR34 8RL
3 High Street Wangford Beccles Suffolk NR34 8RL
4 High Street Wangford Beccles Suffolk NR34 8RR
5 High Street Wangford Beccles Suffolk NR34 8RL
Church Gate 6A High Street Wangford Beccles Suffolk NR34 8RR
6 High Street Wangford Beccles Suffolk NR34 8RR
7 High Street Wangford Beccles Suffolk NR34 8RL
8 High Street Wangford Beccles Suffolk NR34 8RR
9 - 11 High Street Wangford Beccles Suffolk NR34 8RL
12 High Street Wangford Beccles Suffolk NR34 8RA
13 High Street Wangford Beccles Suffolk NR34 8RL
Blyth House 14A High Street Wangford Beccles Suffolk NR34 8RA
Mulberry House 14 High Street Wangford Beccles Suffolk NR34 8RA
15 High Street Wangford Beccles Suffolk NR34 8RL
16 High Street Wangford Beccles Suffolk NR34 8RA
17 High Street Wangford Beccles Suffolk NR34 8RL
Lilliput Cottage 19 High Street Wangford Beccles Suffolk NR34 8RL
21 High Street Wangford Beccles Suffolk NR34 8RL
23 High Street Wangford Beccles Suffolk NR34 8RL
25 High Street Wangford Beccles Suffolk NR34 8RL
27 High Street Wangford Beccles Suffolk NR34 8RL
29 High Street Wangford Beccles Suffolk NR34 8RL
31 High Street Wangford Beccles Suffolk NR34 8RL
41 High Street Wangford Beccles Suffolk NR34 8RL
43 High Street Wangford Beccles Suffolk NR34 8RL
18 Norfolk Road Wangford Beccles Suffolk NR34 8RF
20 Norfolk Road Wangford Beccles Suffolk NR34 8RF
22 Norfolk Road Wangford Beccles Suffolk NR34 8RF
24 Norfolk Road Wangford Beccles Suffolk NR34 8RF
28 Norfolk Road Wangford Beccles Suffolk NR34 8RF
32 Norfolk Road Wangford Beccles Suffolk NR34 8RF
34 Norfolk Road Wangford Beccles Suffolk NR34 8RF
36 Norfolk Road Wangford Beccles Suffolk NR34 8RF
40 Norfolk Road Wangford Beccles Suffolk NR34 8RF
42 Norfolk Road Wangford Beccles Suffolk NR34 8RF
44 Norfolk Road Wangford Beccles Suffolk NR34 8RF
50 Norfolk Road Wangford Beccles Suffolk NR34 8RF
Renby Church Close Wangford Beccles Suffolk NR34 8RQ
3 Church Street Wangford Beccles Suffolk NR34 8RW
Rose Cottage 7 Church Street Wangford Beccles Suffolk NR34 8RW
9 Church Street Wangford Beccles Suffolk NR34 8RW
15 Church Street Wangford Beccles Suffolk NR34 8RW
21 Church Street Wangford Beccles Suffolk NR34 8RW
27 Church Street Wangford Beccles Suffolk NR34 8RW
29 Church Street Wangford Beccles Suffolk NR34 8RW
The Round House 33 Church Street Wangford Beccles Suffolk NR34 8RW
55 Church Street Wangford Beccles Suffolk NR34 8RN
57 Church Street Wangford Beccles Suffolk NR34 8RN
59 Church Street Wangford Beccles Suffolk NR34 8RN
55 C. G.

Old Barn Cottage 5A High Street Wangford Beccles Suffolk NR34 8RL
Flat 2 10 High Street Wangford Beccles Suffolk NR34 8RA
Flat 3 10 High Street Wangford Beccles Suffolk NR34 8RA
Yew Tree House 12A High Street Wangford Beccles Suffolk NR34 8RA
33 High Street Wangford Beccles Suffolk NR34 8RL
35 High Street Wangford Beccles Suffolk NR34 8RL
6 Hill Road Wangford Beccles Suffolk NR34 8AR
Barnside Hill Road Wangford Beccles Suffolk NR34 8AR
Birds Nest Hill Road Wangford Beccles Suffolk NR34 8AR
Essenden Hill Road Wangford Beccles Suffolk NR34 8AR
Willow Creek Hill Road Wangford Beccles Suffolk NR34 8AR
26 Norfolk Road Wangford Beccles Suffolk NR34 8RF
Pips Cottage Norfolk Road Wangford Beccles Suffolk NR34 8RE
Thatch End 4 Hill Road Wangford Beccles Suffolk NR34 8AR
13 Church Street Wangford Beccles Suffolk NR34 8RW
1 Sawyers Cottages Norfolk Road Wangford Beccles Suffolk NR34 8RE
2 Sawyers Cottages Norfolk Road Wangford Beccles Suffolk NR34 8RE
3 Sawyers Cottages Norfolk Road Wangford Beccles Suffolk NR34 8RE
Flat 1 10 High Street Wangford Beccles Suffolk NR34 8RA
Flat 1A 10 High Street Wangford Beccles Suffolk NR34 8RA
Flat 1A 10 High Street Wangford Beccles Suffolk NR34 8RA
Wangford Surgery Church Street Wangford Beccles Suffolk NR34 8RN
The Angel Inn High Street Wangford Beccles Suffolk NR34 8RL
10 High Street Wangford Beccles Suffolk NR34 8RE
Sawyers Cottages Norfolk Road Wangford Beccles Suffolk NR34 8RE
Ford House 2 High Street Wangford Beccles Suffolk NR34 8RR

THIS DIRECTION is made under Article 4(1) of the Order and, in accordance with paragraph 1(7) of Schedule 3, shall remain in force until October 14th 2024 and shall then expire unless it has been confirmed by the Council in accordance with paragraphs 1(9) and 1(10) of Schedule 3.



THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015

Direction Made under Article 4(1)

HOMERSFIELD CONSERVATION AREA
AMENDED AREA 2024

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

DIRECTION MADE UNDER ARTICLE 4(1)

HOMERSFIELD CONSERVATION AREA

WHEREAS the Council of the District of East Suffolk being the appropriate Local Planning Authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order") are satisfied that it is expedient that development of the descriptions set out in the First Schedule should not be carried out within the area of land designated in the Second Schedule such land being outlined in red on the plan annexed hereto unless permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Order HEREBY DIRECTS that the permission granted by Article 3 of the Order shall not apply to the development specified in the First Schedule in respect of the land described in the Second Schedule.

For the purposes of this Direction the expression 'relevant location' (wherever it may appear) shall mean a highway, waterway or open space.

FIRST SCHEDULE

- (a) The enlargement, improvement or other alteration of a dwellinghouse, being the development comprised of Class A of Part I of Schedule 2 of the Order where any part of the enlargement, improvement or other alterations would front a relevant location.
- (b) The enlargement or alteration of a dwellinghouse consisting of an addition or alteration to its roof, being the development comprised of Class B and Class C of Part I of Schedule 2 of the Order where any such alteration would be to a roof slope which fronts a relevant location.
- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being the development comprised within Class D of Part I of Schedule 2 of the Order where any such alteration would front a relevant location.
- (d) The provision within the curtilage of the dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or a container used for domestic heating purposes for the storage of oil or liquid petroleum gas, being the development comprised within Class E of Part I of Schedule 2 of the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the

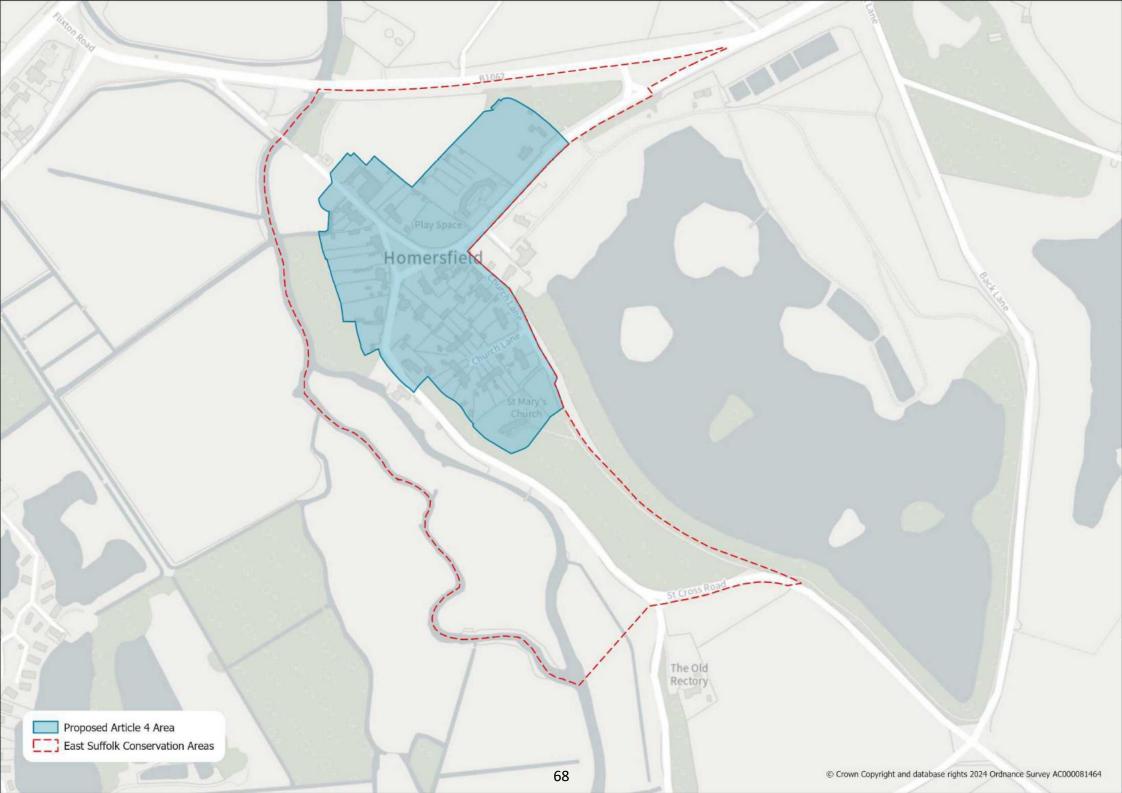
- building or enclosure maintained, improved or altered would front a relevant location.
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such; or the replacement in whole or in part of such a surface, being the development comprised within Class F of Part I of Schedule 2 of the Order where the hard surface would front a relevant location.
- (f) The installation, alteration or replacement of a chimney, flue or soil and vent pipe on a dwellinghouse, being the development comprised within Class G of Part I of Schedule 2 of the Order where any such alteration would be to a wall or roof slope which fronts a relevant location.
- (g) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being the development comprised within Class A of Part 2 of Schedule 2 of the Order where the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location.

SECOND SCHEDULE

1 Swan Cottages The Green Homersfield Harleston Suffolk IP20 0ET
2 Swan Cottages The Green Homersfield Harleston Suffolk IP20 0ET
St Marys Church St Cross Road Homersfield Suffolk
Swan Cottages The Green Homersfield Harleston Suffolk IP20 0ET
The Black Swan Church Lane Homersfield Harleston Suffolk IP20 0ET
Salon At 84 The Green Homersfield Suffolk
Flat At The Black Swan Church Lane Homersfield Harleston Suffolk IP20 0ET
The Old Post Office Church Lane Homersfield Harleston Suffolk IP20 0ET
Heath Cottage Church Lane Homersfield Harleston Suffolk IP20 0ET
Mill House Church Lane Homersfield Harleston Suffolk IP20 0ET
Waveney Cottage Church Lane Homersfield Harleston Suffolk IP20 0ET
Waveney House Church Lane Homersfield Harleston Suffolk IP20 0ET
The Thatched Cottage Church Lane Homersfield Harleston Suffolk IP20 0EU
93 Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
94 Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
95 Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
96 Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
97 Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
98 Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
1 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
10 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
11 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
12 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
13 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
14 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
15 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
16 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU

17 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
18 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
2 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
3 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
4 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
5 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
6 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
7 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
8 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
9 Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU
Corner Cottage 67 Church Lane Homersfield Harleston Suffolk IP20 0ET
68 The Green Homersfield Harleston Suffolk IP20 0ET
69 The Green Homersfield Harleston Suffolk IP20 0ET
70 The Green Homersfield Harleston Suffolk IP20 0ET
Green View 79 Church Lane Homersfield Harleston Suffolk IP20 0ET
Plum Tree Cottage 80 Church Lane Homersfield Harleston Suffolk IP20 0ET
82 The Green Homersfield Harleston Suffolk IP20 0ET
83 The Green Homersfield Harleston Suffolk IP20 0ET
84 The Green Homersfield Harleston Suffolk IP20 0ET
85 The Green Homersfield Harleston Suffolk IP20 0ET
Black Swan Cottage 86 The Green Homersfield Harleston Suffolk IP20 0ET
81 The Green Homersfield Harleston Suffolk IP20 0ET
Second Cottage Church Lane Homersfield Harleston Suffolk IP20 0ET
St Marys Cottage Church Lane Homersfield Harleston Suffolk IP20 0ET
Barnfield Cottages Church Lane Homersfield Harleston Suffolk IP20 0ET
Glebe Cottages Church Lane Homersfield Harleston Suffolk IP20 0EU

THIS DIRECTION is made under Article 4(1) of the Order and, in accordance with paragraph 1(7) of Schedule 3, shall remain in force until October 14th 2024 and shall then expire unless it has been confirmed by the Council in accordance with paragraphs 1(9) and 1(10) of Schedule 3.



THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015

Direction Made under Article 4(1)

WALBERSWICK CONSERVATION AREA WALBERSWICK QUAY AREA 2024

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

DIRECTION MADE UNDER ARTICLE 4(1)

WALBERSWICK CONSERVATION AREA (WALBERSWICK QUAY)

WHEREAS the Council of the District of East Suffolk being the appropriate Local Planning Authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order") are satisfied that it is expedient that development of the descriptions set out in the First Schedule should not be carried out within the area of land designated in the Second Schedule such land being outlined in red on the plan annexed hereto unless permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Order HEREBY DIRECTS that the permission granted by Article 3 of the Order shall not apply to the development specified in the First Schedule in respect of the land described in the Second Schedule.

For the purposes of this Direction the expression 'relevant location' (wherever it may appear) shall mean a highway, waterway or open space.

FIRST SCHEDULE

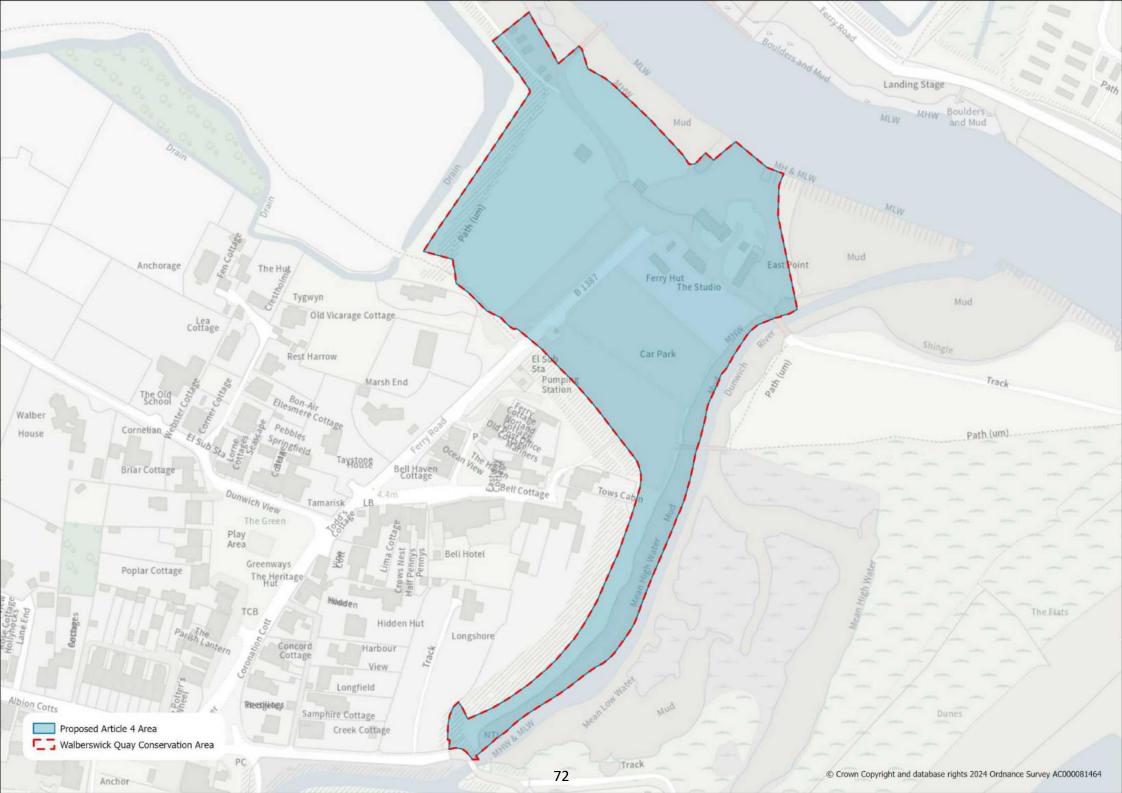
- (a) The enlargement, improvement or other alteration of a dwellinghouse, being the development comprised of Class A of Part I of Schedule 2 of the Order where any part of the enlargement, improvement or other alterations would front a relevant location.
- (b) The enlargement or alteration of a dwellinghouse consisting of an addition or alteration to its roof, being the development comprised of Class B and Class C of Part I of Schedule 2 of the Order where any such alteration would be to a roof slope which fronts a relevant location.
- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being the development comprised within Class D of Part I of Schedule 2 of the Order where any such alteration would front a relevant location.
- (d) The provision within the curtilage of the dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or a container used for domestic heating purposes for the storage of oil or liquid petroleum gas, being the development comprised within Class E of Part I of Schedule 2 of the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the

- building or enclosure maintained, improved or altered would front a relevant location.
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such; or the replacement in whole or in part of such a surface, being the development comprised within Class F of Part I of Schedule 2 of the Order where the hard surface would front a relevant location.
- (f) The installation, alteration or replacement of a chimney, flue or soil and vent pipe on a dwellinghouse, being the development comprised within Class G of Part I of Schedule 2 of the Order where any such alteration would be to a wall or roof slope which fronts a relevant location.
- (g) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being the development comprised within Class A of Part 2 of Schedule 2 of the Order where the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location.

SECOND SCHEDULE

East Point Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
The Studio Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
The Craft Room Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
The Boathouse Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
The Yacht Yard Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Top Deck The Yacht Yard Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Lower Deck The Yacht Yard Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Ferry Hut Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Fishermans Hut Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Fishermans Hut 1 Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Fishermans Hut 2 Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		
Fishermans Hut 3 Walberswick Quay Ferry Road Southwold Suffolk IP18 6TG		

THIS DIRECTION is made under Article 4(1) of the Order and, in accordance with paragraph 1(7) of Schedule 3, shall remain in force until October 14th 2024 and shall then expire unless it has been confirmed by the Council in accordance with paragraphs 1(9) and 1(10) of Schedule 3.



DRAFT

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015

Direction Made under Article 4(1)

MARLESFORD CONSERVATION AREA
AMENDED AREA 2024

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

DIRECTION MADE UNDER ARTICLE 4(1)

MARLESFORD CONSERVATION AREA

WHEREAS the Council of the District of East Suffolk being the appropriate Local Planning Authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the Order") are satisfied that it is expedient that development of the descriptions set out in the First Schedule should not be carried out within the area of land designated in the Second Schedule such land being outlined in red on the plan annexed hereto unless permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Order HEREBY DIRECTS that the permission granted by Article 3 of the Order shall not apply to the development specified in the First Schedule in respect of the land described in the Second Schedule.

For the purposes of this Direction the expression 'relevant location' (wherever it may appear) shall mean a highway, waterway or open space.

FIRST SCHEDULE

- (a) The enlargement, improvement or other alteration of a dwellinghouse, being the development comprised of Class A of Part I of Schedule 2 of the Order where any part of the enlargement, improvement or other alterations would front a relevant location.
- (b) The enlargement or alteration of a dwellinghouse consisting of an addition or alteration to its roof, being the development comprised of Class B and Class C of Part I of Schedule 2 of the Order where any such alteration would be to a roof slope which fronts a relevant location.
- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being the development comprised within Class D of Part I of Schedule 2 of the Order where any such alteration would front a relevant location.
- (d) The provision within the curtilage of the dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or a container used for domestic heating purposes for the storage of oil or liquid petroleum gas, being the development comprised within Class E of Part I of Schedule 2 of the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the

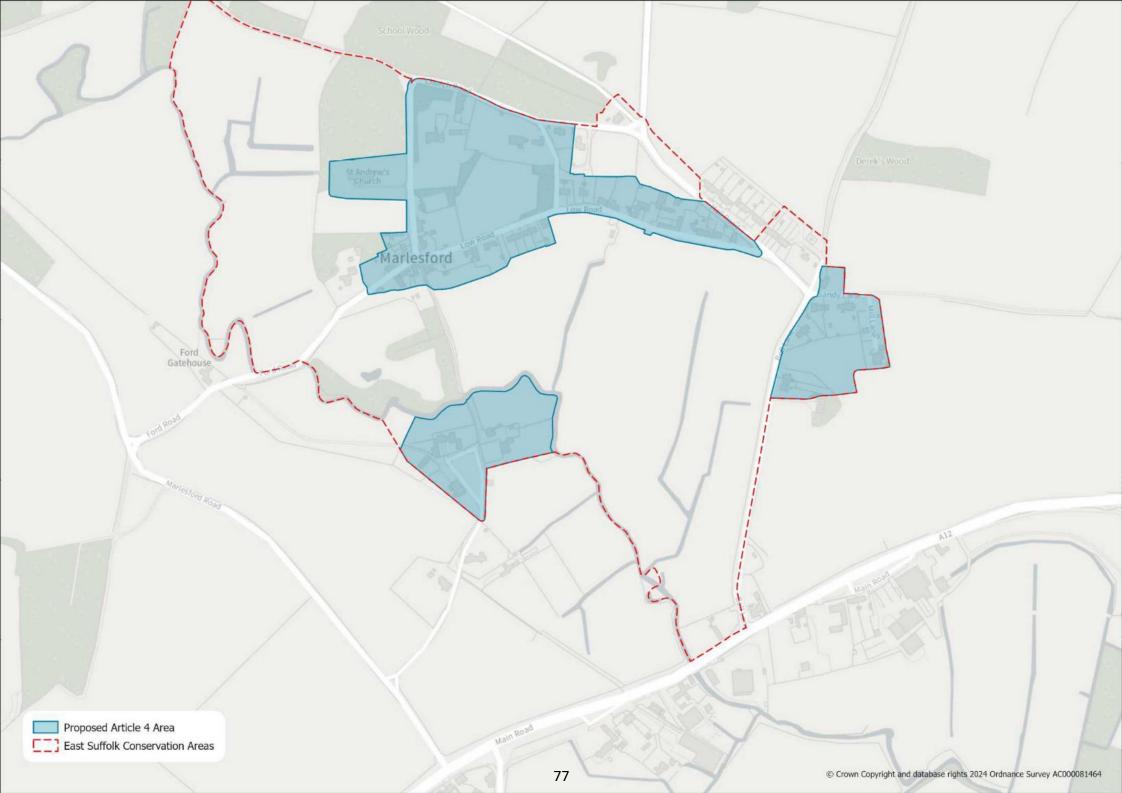
- building or enclosure maintained, improved or altered would front a relevant location.
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such; or the replacement in whole or in part of such a surface, being the development comprised within Class F of Part I of Schedule 2 of the Order where the hard surface would front a relevant location.
- (f) The installation, alteration or replacement of a chimney, flue or soil and vent pipe on a dwellinghouse, being the development comprised within Class G of Part I of Schedule 2 of the Order where any such alteration would be to a wall or roof slope which fronts a relevant location.
- (g) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being the development comprised within Class A of Part 2 of Schedule 2 of the Order where the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location.

SECOND SCHEDULE

The Barn Church Road Marlesford Woodbridge Suffolk IP13 0AT		
St Andrews Church Church Road Marlesford Suffolk		
1 East View Cottages Church Road Marlesford Woodbridge Suffolk IP13 0AT		
Quoit House Church Road Marlesford Woodbridge Suffolk IP13 0AT		
1 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
2 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
3 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
4 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
14 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
High House 16 Low Road Marlesford Woodbridge Suffolk IP13 0AL		
18 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
19 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
24 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
25 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
26 Low Road Marlesford Woodbridge Suffolk IP13 0AL		
27 Low Road Marlesford Woodbridge Suffolk IP13 OAL		
1 Mill Lane Marlesford Woodbridge Suffolk IP13 0AJ		
3 Mill Lane Marlesford Woodbridge Suffolk IP13 0AJ		
1 The Street Marlesford Woodbridge Suffolk IP13 0AP		
2 The Street Marlesford Woodbridge Suffolk IP13 0AP		
3 The Street Marlesford Woodbridge Suffolk IP13 0AP		
Lavender Cottage 1 Bell Lane Marlesford Woodbridge Suffolk IP13 0AH		
Lambley Cottage Bell Lane Marlesford Woodbridge Suffolk IP13 0AH		
White Cottages Bell Lane Marlesford Woodbridge Suffolk IP13 0AH		
2 White Cottages Bell Lane Marlesford Woodbridge Suffolk IP13 0AH		
3 White Cottages Bell Lane Marlesford Woodbridge Suffolk IP13 0AH		
The Firs Church Road Marlesford Woodbridge Suffolk IP13 0AT		

The Old Granary Hall Road Marlesford Woodbridge Suffolk IP13 0AX			
The Rectory Church Road Marlesford Woodbridge Suffolk IP13 0AT			
Thimble Cottage 17 Low Road Marlesford Woodbridge Suffolk IP13 0AL			
April Cottage Low Road Marlesford Woodbridge Suffolk IP13 OAL			
Meadow Cottage Low Road Marlesford Woodbridge Suffolk IP13 0AW			
Poplar Farm Low Road Marlesford Woodbridge Suffolk IP13 0AL			
Turnpenny Cottage Low Road Marlesford Woodbridge Suffolk IP13 OAL			
Walkers Cottage Low Road Marlesford Woodbridge Suffolk IP13 OAL			
1 Holly Cottages Low Road Marlesford Woodbridge Suffolk IP13 0AN			
2 Holly Cottages Low Road Marlesford Woodbridge Suffolk IP13 0AN			
Abinger Mill Lane Marlesford Woodbridge Suffolk IP13 0AJ			
Mill House Mill Lane Marlesford Woodbridge Suffolk IP13 0AJ			
The Wolery Mill Lane Marlesford Woodbridge Suffolk IP13 0AJ			
Holly Tree House Low Road Marlesford Woodbridge Suffolk IP13 0AN			
1 White Cottages Bell Lane Marlesford Woodbridge Suffolk IP13 0AH			
Holly Cottages Low Road Marlesford Woodbridge Suffolk IP13 0AN			
Pippin Cottage Ford Road Marlesford Woodbridge Suffolk IP13 0AR			
1 - 2 Rose Terrace Ford Road Marlesford Woodbridge Suffolk IP13 0AR			
Ford Cottage Ford Road Marlesford Woodbridge Suffolk IP13 OAS			
Jubilee Cottage Mill Lane Marlesford Woodbridge Suffolk IP13 0AJ			
Rose Cottage 3 Rose Terrace Ford Road Marlesford Woodbridge Suffolk IP13 OAR			
Community Centre Church Road Marlesford Woodbridge Suffolk IP13 0AT			
School Cottage Church Road Marlesford Woodbridge Suffolk IP13 0AT			
Wren House Hall Road Marlesford Woodbridge Suffolk IP13 0AX			
Red Poll House Hall Road Marlesford Woodbridge Suffolk IP13 0AX			
Lime Tree Farm Lime Tree Farm Lane Marlesford Woodbridge Suffolk IP13 0AE			
Goat Cottage Lime Tree Barn Lime Tree Farm Lane Marlesford Woodbridge Suffolk IP13 0AE			
2 East View Cottages Church Road Marlesford Woodbridge Suffolk IP13 0AT			
3 East View Cottages Church Road Marlesford Woodbridge Suffolk IP13 0AT			
The Boot House Church Road Marlesford Woodbridge Suffolk IP13 0AT			
The Boot House Church Road Marlesford Woodbridge Suffolk IP13 0AT			

THIS DIRECTION is made under Article 4(1) of the Order and, in accordance with paragraph 1(7) of Schedule 3, shall remain in force until October 14th 2024 and shall then expire unless it has been confirmed by the Council in accordance with paragraphs 1(9) and 1(10) of Schedule 3.



FIELDWORK SURVEY FOR THE REVISION OF EXISTING ARTICLE 4 DIRECTIONS

Introduction

This methodology outlines Purcell's approach for carrying out a fieldwork survey to provide evidence of the existing condition of the conservation areas in East Suffolk where blanket Article 4 directions have been imposed. This task includes the dissemination of data collected via excel spreadsheet, annotated on GIS mapping for display, and the provision of photographic files of the streets assessed. The data collected will provide evidence required by the NPPF to revise Article 4 Directions to be applied to the smallest geographical area possible within the conservation areas in question.

Address Data and Selection

East Suffolk Council have provided a spreadsheet listing all properties within the conservation areas under review. Across all conservation areas for study in Year 1, this data comprised of 2390 addresses. In order to generate a shortlist of addresses for assessment, conservation area appraisals have been reviewed; properties described as positive contributors or buildings of merit have been put forward for assessment, while properties already afforded statutory protection through listed status, or described as neutral or detrimental have been removed.

Where properties are listed in conservation area appraisals under a grouping—often due to their interconnected form e.g. terraces or semi-detached properties— they will be assessed as a single entry, unless considered more readily separable due to location or material differences.

Site Survey Proforma and Fieldwork Data Collection

The features of each selected building to be assessed, as specified by East Suffolk Council, form the proforma for our collection of data. For each building we will assess the following where they front a 'relevant location' (defined as a highway, waterway or open space):

- Whether it retains original, historically appropriate replacement or unsympathetic replacement windows and doors;
- Whether or not the elevation visible from the relevant locations remains unpainted;
- Whether there has been any alteration to the front boundary treatment, including removal in whole or in part;
- Whether any hardstanding within the front garden has been introduced;
- Whether there has been any alteration to the roof or chimney, including the introduction of rooflights;
- Whether a porch has been added.

The data will be collected efficiently on site via a Microsoft Form, which will populate an excel spreadsheet showing the assessed property beside each assessment criteria, with the most appropriate response chosen from the below options. The category 'Half or more' relates to features where 50%-99% of the feature remains, while 'Less than half' relates to features where 1%-49% of the feature remains.

Appropriate windows:

All [all original or historically appropriate replacements]
Half or more [half or more than half original or historically appropriate replacements]

Less than half
 [less than half original or historically appropriate replacements]

EAST SUFFOLK ARTICLE 4S FIELDWORK SURVEY

METHODOLOGY



None [no original or historically appropriate replacements]

o N/A [not visible from a relevant location]

- Appropriate doors:

All [all original or historically appropriate replacements]
 Half or more [half or more than half original or historically appropriate

replacements]

Less than half
 [less than half original or historically appropriate replacements]

o None [no original or historically appropriate replacements]

N/A [not visible from a relevant location]

- Unaltered roof:

All [all have unaltered roof form and covering]Half or more [half or more than half of roofs unaltered]

Less than half
 [less than half of roofs unaltered]

None [all have altered roof e.g. rooflights, dormers or renewed covering]
 N/A [not visible from a relevant location e.g. parapet or flat roof]

- Façade treatment [where it fronts a relevant location]

Painted Brickwork [painted brickwork to principal elevation]
 Unpainted Brickwork [unpainted brickwork to principal elevation]
 Painted Other [painted non-brick principal elevation]
 Unpainted Other [unpainted non-brick principal elevation]

- Front boundary intact:

Historic boundary [retaining historic front boundary]

o Non-Historic boundary [replacement non-historic front boundary]

o Removed [front boundary removed]

o N/A [no front boundary e.g. fronting onto pavement]

- Hardstanding in front garden:

All [hardstanding inserted into all front garden]

o Half or more [hardstanding inserted into half or more than half of front garden(s)]

o Less than half [hardstanding inserted into less than half of front gardens]

None [no hardstanding in front garden]
 N/A [no front garden visible for assessment]

- Chimney

All [retaining all historic chimneys]

Half or more [retaining half or more than half of its historic chimneys]
 Less than half [retaining less than half of its historic chimneys]

None [evidence of historic chimneys, now removed]
 N/A [no chimney existed e.g. barn/warehouse]

- Porch

Non-Historic Porch [all have non-historic porch replacement/addition]

Historic Porch [historic porch surviving]

Half or more [half or more than half have non-historic porch

replacement/addition]

Less than half [less than half have non-historic porch replacement/addition]

None [no porch visible from a relevant location]



- Comments
 - o Any additional comments from the assessor to clarify or add to the above

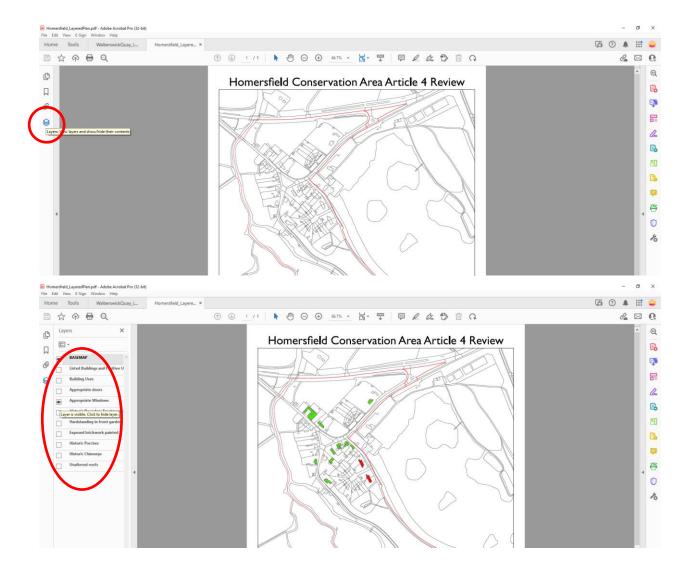
Collected Data

Spreadsheet and Photographs

The data collected from fieldwork through the Microsoft Form will be provided as a spreadsheet, and the data annotated in GIS for display (the data files of which will be provided). General photographs of each street taken during fieldwork will be provided as .jpeg files in folders arranged on a street-by-street basis.

Mapping

Once processed in GIS, the survey data will be exported as layered PDFs which are interactive. The PDFs will contain a series of layers that can be turned on and off in any combination from the 'Layers' menu panel that appears on the left-hand side of the PDF.

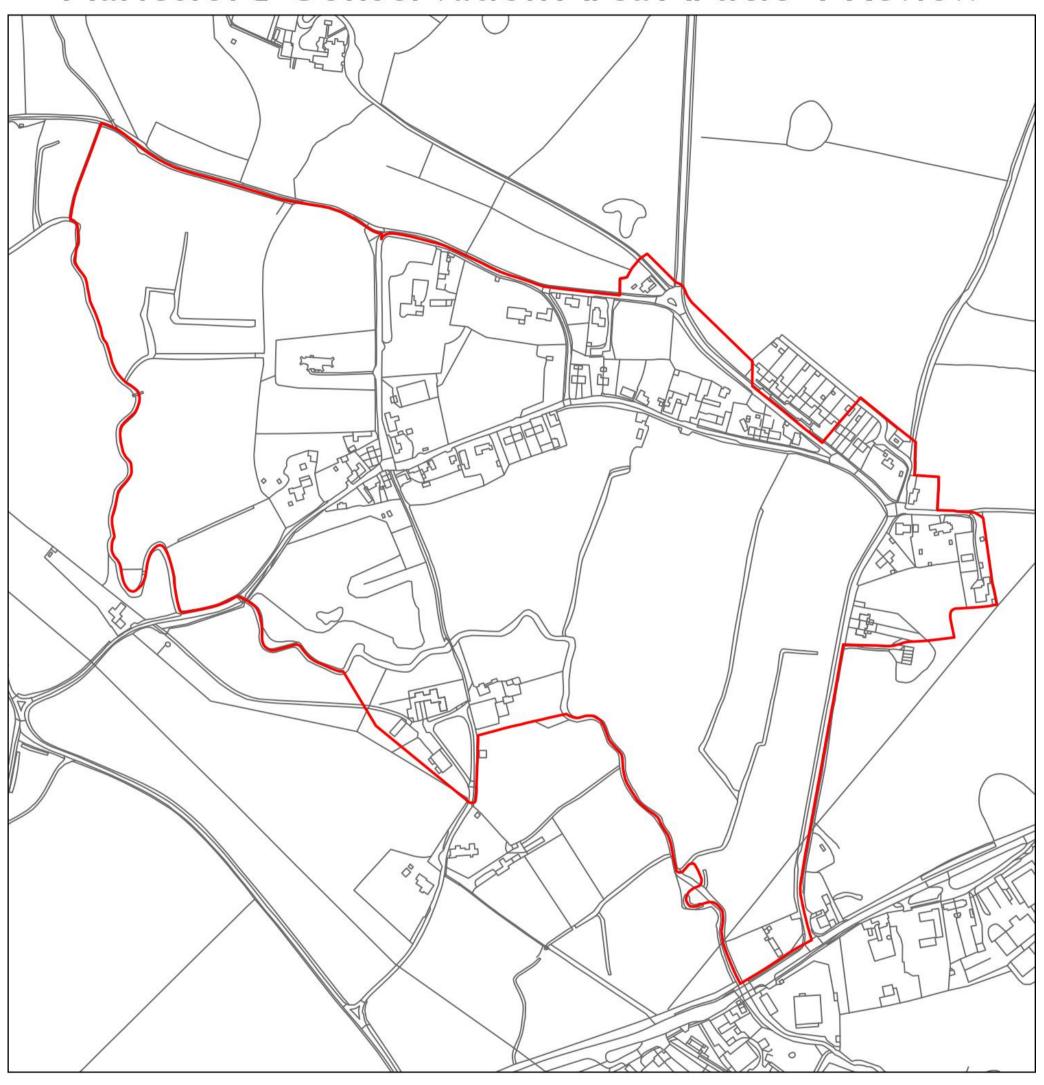


Homersfield Conservation Area Article 4 Review



☐ Homersfield Conservation Area

Marlesford Conservation Area Article 4 Review



☐ Homersfield Conservation Area

Southwold Conservation Area Article 4 Review



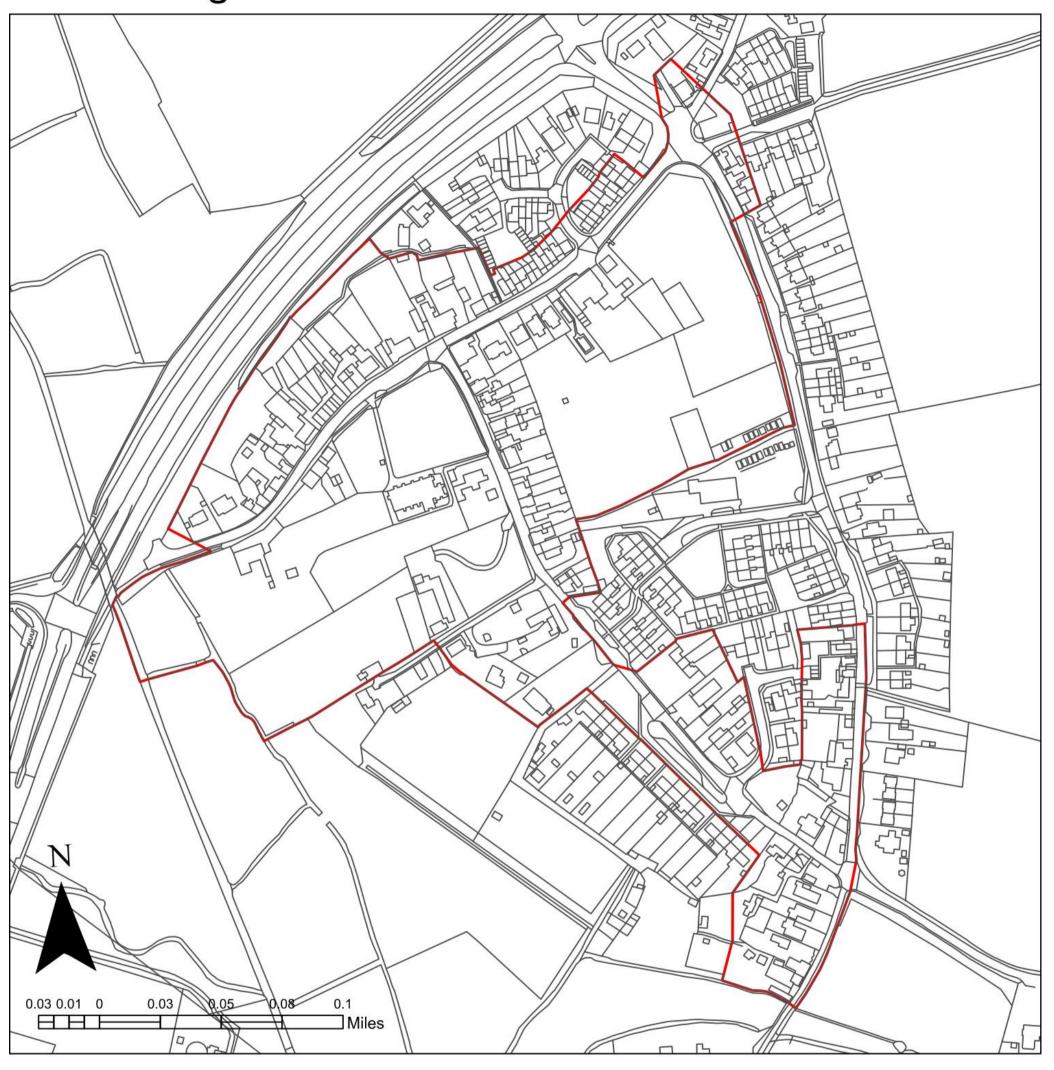
Southwold Conservation Area

Walberswick Quay Conservation Area Article 4 Review



Walberswick Conservation Area

Wangford Conservation Area Article 4 Review



 ☐ Wangford Conservation Area



Committee	Strategic Planning Committee	
Date	08/07/2024	
Subject	Annual Planning Performance Report – 1 April 2023 to 31 March 2024	
Cabinet Member	Cllr Kay Yule	
Report Author(s)	Katherine Scott	
	Principal Planner (Development Management, Technical Lead)	
	katherine.scott@eastsuffolk.gov.uk	
Head of Service	Ben Woolnough	
	Head of Planning, Building Control and Coastal Management	
	ben.woolnough@eastsuffolk.gov.uk	
Director	Nick Khan	
	Strategic Director	
	nick.khan@eastsuffolk.gov.uk	

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	n/a
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

This report publishes the quarterly and annual figures for the number of 'Planning Applications' and Planning related applications determined within government targets or agreed extensions of time within the most recently completed financial quarter.

Recommendation(s)

That Strategic Planning Committee notes this report concerning the performance of the Development Management Team in terms of the speed of determining planning applications.

Strategic plan		
How does this proposal	support Our Direction 2028?	
Environmental Impact	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process has to consider the material planning impacts upon the environment.	
Sustainable Housing	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the planning policies which are used to determine such applications seeks to ensure the provision of sustainable housing.	
Tackling Inequalities	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the planning policies which are used to determine such applications, seek to support communities, and the provision of facilities which can be beneficial including community buildings, open space and facilities for physical and mental health wellbeing.	
Thriving Economy	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the planning policies which are used to determine such applications, seek to support appropriate economic development within the district.	
Our Foundations / governance of the organisation	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors.	

Justification for recommendations

1. Background

- 1.1. This report provides details on the determination timescales for all planning applications at East Suffolk Council when tested against the government set timescales as well as the East Suffolk Council stretched targets.
- 1.2. The Key Performance Indicators (KPIs) are reported on a quarterly basis and included within the East Suffolk Council performance report and tested against the Council's Business Plan.

2. Introduction

- 2.1. East Suffolk Council as Local Planning Authority determines applications that seek Planning Permission, Listed Building Consent, Advertisement Consent and Tree Works applications along with associated applications such as those seeking approval of matters reserved by conditions on consents.
- 2.2. This report focuses on the applications for Planning Permission (those seeking Approval of Reserved Matters, Change of Use, Full Planning Permission, Outline Planning Permission, Removal of Condition(s) and Variations of Condition(s)). They are herein referred to as Planning Applications.
- 2.3. However, some data is also included in relation to the other forms of formal applications determined by the Local Planning Authority during the period 1 April 2023 to 31 March 2024, and the preceding years.
- 2.4. Alongside dealing with these formal planning applications, the Development Management Team provide a pre-application advice service and are also responsible for monitoring and enforcing planning matters.
- 2.5. During the 2023-24 financial year 4,558 formal planning applications, other planning related applications and pre-application enquiries were validated, with only slight variation between the quarters. There were 1,212 submissions validated between April to June, 1,138 between July and September, 1,089 between October and December, and 1,119 between January to April.
- 2.6. This report is intended to be read as a whole, but due to the nature of the subject this Introduction section is very long, so it has been split into the following sub-sections to aid in navigation and finding the specific information (click on a link to jump to that section):
 - "An accelerated planning system" consultation
 - Planning Applications
 - Planning Related Applications that are not 'Planning Applications'
 - Pre-application Advice

- Planning Appeals
- Planning Enforcement
- <u>Freedom of Information Requests (FOIs), Environmental Information</u>
 <u>Requests (EIRs) and other requests for information</u>
- Formal Complaints and Complements

"An accelerated planning system" consultation

- 2.7. Recently the government consulted on various changes to planning under the title "An accelerated planning system". This included proposals for an accelerated decision-making process for Major Commercial/Employment applications, reducing the timeframe from 13 weeks to 10 weeks and the possibility of the requirement to refund planning fees when that 10 week period was not met. East Suffolk has robustly responded to this, that this speed of process is not necessary, realistic or achievable and it would undermine the ability to achieve good decision making. Such a process would heavily depend on a lot of front-loaded consideration at the pre-application stage, which isn't always forthcoming from applicants.
- 2.8. The consultation also proposed other constraints on the decision-making process with the aim of faster decision making. This included the concept of not permitting Extensions of Time for determination beyond 8 weeks for Householder planning applications. Such a change is unlikely to be welcomed by Councils and applicants, with both parties recognising the benefit of additional time which often allows negotiations on proposals and the ability to achieve better designed outcomes and ultimately achieve more approved applications. A curtailed process would result in more refusals, more appeals and overall, less public benefit from the planning process alongside a risk of poorer design and environmental outcomes.
- 2.9. Because of increasing recent case law in respect of the processes to amend planning permissions, the consultation proposed an additional method to the Section 73 process as a proposed Section 73 B for a more comprehensive amendments to planning applications. Our position was that such a change would be welcomed, but that it would add complexity to a complicated system which needs a more comprehensive review.

Planning Applications

- 2.10. A Planning Application, for the purpose of quarterly returned to Government and for the purposes of this report, is an application seeking Planning Permission, that is applications for Full Planning Permission, Outline Planning Permission, Reserved Matters Approval, Changes of Use, Variation of Conditions and those seeking Removal of Conditions.
- 2.11. Planning Applications are split into 3 categories for the purposes of nationally set target dates and for monitoring purposes (Major, Minor and Others). Those categories are based upon their scale. The definition of Major development is defined in The Town and County Planning (Development Management Procedure) (England) (Order) 2015 (As amended) as

"major development" means development involving any one or more of the following—

- (a) the winning and working of minerals or the use of land for mineral-working deposits;
- (b) waste development;
- (c) the provision of dwellinghouses where—
 - (i) the number of dwellinghouses to be provided is 10 or more; or (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- (e) development carried out on a site having an area of 1 hectare or more;"
- 2.12. 'Minor' development for the purpose of a district Local Planning Authority such as East Suffolk Council is 1-9 dwellings or a site area of less than 0.5 if the number of dwellings is not known, and if the floorspace of the building or buildings would be less than 1,000 and the site area is less than 1 Hectare in size.
- 2.13. 'Other' development is Changes of Use with no physical works and Householder applications (e.g. extensions and alterations to existing dwellings, outbuildings, fences etc).
- 2.14. For the purposes of the quarterly returns to Government and therefore also for the purposes of this report the numbers for 'Minor' and 'Other' Planning Applications are combined as 'non-major' applications.
- 2.15. Between 1 April 2023 and 31 March 2024, East Suffolk Council determined a total of 5,732 submissions, 1,888 of which were Planning Applications i.e. those seeking Planning Permission (Appendix A, Figure 1, shows numbers per quarter). The remainder of the cases were planning related applications which are explored in the <u>Planning Related Applications that are not 'Planning Applications'</u> section below.
- 2.16. Section 33 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) sets out the timeframes for the determination of Planning Applications by Local Planning Authorities, setting a 13- week target for 'Major' applications and 8 weeks for 'non-Major' applications. It is these national targets that East Suffolk Council must seek to meet for the determination of all planning applications.
- 2.17. The number of Major and Non-Major applications determined within the national target dates (13 weeks for Majors, 8 weeks for Non-Majors), within agreed extensions of time or out of time, has to be reported to central government on a quarterly basis. These figures are also reported to the Strategic Planning Committee on a quarterly basis and reviewed on an annual basis through this Planning Performance Report (links to previous reports are provided in the background papers section at the end of this report).
- 2.18. These 8/13 week timescales pre-date the 2015 Order and have been in place for decades. They have not been increased in length despite the increasing complexity of applications resulting from increased expectations placed upon the planning process from national legislation and planning policy, leading to increased complexity in the

- considerations by consultees and the Local Planning Authority in determining such applications.
- 2.19. This increase in complexity alongside depleting resources nationally both within Local Authorities and external parties who provide consultation responses, leads to increasing pressure and dependency on agreeing extensions of time with agents/applicants, in order for Local Planning Authorities to be able to meet national targets for the proportions of applications determined within either the 8/13 week timescales or agreed extensions of time.
- 2.20. The numbers of applications determined within these 8/13 week targets and/or agreed extensions of time are monitored and have to be reported to government on a quarterly basis (currently to the Department for Levelling Up, Housing and Communities), who use these figures to monitor the performance of Local Planning Authorities.
- 2.21. Section 62A of the Town and Country Planning Act 1990 (as amended) allows for certain applications to be made direct to the Secretary of State, where the Local Planning Authority for the area has been designated for this purpose. This 'designation' can be imposed if over a two-year period, a Local Planning Authority fails to meet thresholds for the proportion of 'Major', or 'Non-Major' Planning Applications being determined within statutory target dates (13 or 8 weeks respectively) or within an extension of time agreed with the applicant/agent.
- 2.22. National monitoring is over a two-year period, requiring the overall proportion of applications within that period to meet a target of 60% for Majors and 70% for Non-Majors to be either within the national target dates or within agreed extensions of time.
- 2.23. We currently have figures for six of the eight quarters of the current 2-year monitoring period, which runs until 30 September 2024.
- 2.24. The quarterly figures for the overall proportion of Major decisions determined within the national target dates or within agreed extensions of time during the current monitoring period are shown in **Appendix E, Figure 5.** This shows that East Suffolk Council as Local Planning Authority is consistently achieving well above the national target of 60% and our own stretch target of 65%, with an overall figure for the 2 year period of 89%.
- 2.25. The equivalent figures for Non-Major decisions are shown in **Appendix E, Figure 10**, which shows that whilst in most quarters we have achieved in excess of the required 70%, during the last quarter (January to March 2024), only 67.84% of Non-Major Planning Applications were determined either within the national target dates or within agreed extensions of time.
- 2.26. This reduction in performance is unfortunate. However, during the quarter there were a number of factors that likely affected the capacity of the team.
- 2.27. It should also be noted that between 1 April 2023 and 31 March 2024, East Suffolk Council determined a total of 5,732 planning applications, other planning related applications and pre-application submissions, which is significantly higher than the 4,558 submissions validated during this period. Therefore, a significant number of the

decisions issued must have been submitted prior to the period starting, indicating that the team has been clearing out and determining some older cases, which in turn will have reduced the performance figures (unless extensions of time were secured). It should also be noted that the 5,732 determinations is significantly higher than the 5,125 determinations during the previous financial year (2022-23), and the teams hard work in determining approximately 600 more cases in that year, through a very similar number of case of officers, should be commended.

- 2.28. Officers are aware of this dip in performance and are working hard to increase the numbers of non-major applications determined in time.
- 2.29. However, whilst this dip is far from ideal, it is not a significant problem in terms of Government Monitoring as it is the overall figure for the two-year monitoring period is key to the national monitoring process, and at the close of the last quarter we were still achieving 76.26%, which provides some buffer above the 70%. Although it is recognised that we need to ensure that the efforts to improve performance are maintained.
- 2.30. Based upon the graphs in **Appendix E, Figures 8 and 9,** a significant proportion of the Non-Major decisions are Householder applications. Therefore, they are recognised as a key target to improve performance both in terms of case officers ensuring that efforts are made to improve the numbers being considered and recommendations drafted but also in terms of the speed of review and signing off.

Planning Related Applications that are not 'Planning Applications'

- 2.31. Alongside Planning Applications, the Development Management Team also determine a significant number of other types of planning related applications, including those for Listed Building Consent, Advertisement Consent, Prior Notification Approval, Certificate of Lawfulness, Discharge of Conditions and Non-Material Amendments.
- 2.32. A graph showing the number of key types of these other types of planning related applications is included in **Appendix A**, **Figure 4**, with further detailed breakdowns in the figures in **Appendix C**. There were more decisions issued for these types of applications during the January to March quarter than the previous quarter, which may in part have affected the capacity the team to issue the non-major planning application decisions as quickly as we would have liked.
- 2.33. Whilst these other types of planning related applications do not count for the purposes of the 2-year monitoring period targets, they are still important, and many still have to be issued in time to avoid other impacts. For example, Prior Notifications must be determined within the 8-week period in order for the Local Planning Authority to be able to impose conditions and/or to avoid the potential for deemed consent.
- 2.34. Therefore, such applications cannot be put aside to allow for a sole focus on the Planning Applications. However, the team recognises that Planning Applications, and certain types of the other forms of application such as Prior Notifications have to be given priority over those that do not have such formal impacts.

Pre-application Advice

- 2.35. In additional to formal applications, officers continue to work proactively with agents to promote the pre-application service to seek to provide appropriate advice on the suitability or otherwise of schemes and to ensure that where applications are submitted they have the right level of information accompanying them to enable swift decisions on applications to be made.
- 2.36. During the 2023-24 financial year there were 1,482 Pre-application submissions closed, with advice being provided to potential applicants and/or agents on whether planning permission or another form of planning consent would be required, the likelihood of such consents being granted, potential ways in which schemes could be improved, and the information that would need to accompany a formal application for consent. The number of cases closed per guarter are included in **Appendix C, Figure 13**.
- 2.37. The pre-application service we provide, takes significant officer time, not only in reviewing the proposals submitted for advice, but also in meetings, and drafting written advice and the review of that written advice. However, officers recognise the importance of the pre-application process in terms of adding value to improve schemes early in the process before a formal application is submitted.
- 2.38. It is also recognised providing advice on the potential need for consent, which means those that utilise this service can avoid undertaking works that require planning, advertisement or listed building consent, and thus at least in theory reduce the number of breaches of planning control.
- 2.39. There remains an intention to review the pre-application service we provide, beginning with a consultation in the form of a questionnaire. The intention is to commence that consultation this summer.
- 2.40. Alongside this service, the Development Management and Enforcement Team provide a duty officer system, on all working weekdays. It is operated on a rota system by those within the team, who provide informal advice to simple planning enquiries of a nature which can be responded to without significant research or review of significant amounts of submitted information.
- 2.41. This duty officer system can potentially reduce the need for the submission of some of the very simple pre-application enquiries and therefore the officer time that entails, but it must also be recognised that some of the queries to the duty officer appear to be seeking advice on a matter that is complex and cannot be answered via a quick phone call, so those customers have to be directed to the pre-application service in any case.

<u>Planning Appeals</u>

2.42. The outcomes of appeals are reported on a quarterly basis to the Strategic Planning Committee, and the latest of these reports is also on this meeting's agenda. These reports include summaries of the outcomes and key issues raised in all appeal decisions along with an analysis of the percentage of cases dismissed or allowed on appeal for Major, Minor and Other application types. They relate to all appeal decisions received

since the previous report, so do not fully align with the financial year that this report is covering, and therefore the numbers outlined in this report and in **Appendix F** are not identical to those reported in those quarterly reports.

- 2.43. Applicants have a right to appeal certain decisions made by ESC as the Local Planning Authority. Most appeals are generally against a refusal of Planning Permission, or less frequently a refusal of Listed Building Consent and occasionally a refusal of Certificate of Lawfulness applications or Advertisement Consent. There are also rights of appeal against conditions imposed on consents, a right of appeal if an application is not determined within a government set target or an agreed extension of time and against Enforcement Notices that are served.
- 2.44. Between 1 April 2023 and 31 March 2024, there were 73 appeal decisions, including:
 - 56 against refusals of planning permission (2 Majors, 36 Minors and 18 Others),
 - 1 appeal against the inclusion of a condition on a planning permission,
 - 3 appeals against the refusal of Prior Notification applications,
 - 2 appeals against refusals of Advertisement Consent applications,
 - 1 appeal against the refusal of a Certificate of Lawfulness application,
 - 1 appeal against the refusal of a Listed Building Consent applications,
 - and
 - 6 appeals against enforcement notices,
- 2.45. There were no applications for costs decisions during this period.
- 2.46. The majority of the above appeals were determined via a written representations process (18.8% via House Holder Fast Track and 75% via normal written representations route), with 5.8% determined via Hearings. There were no decisions relating to appeals subject to a Public Enquiry (**Appendix F, Figure 3**).
- 2.47. Overall, 89% of these appeals were dismissed with just 6% being split decisions (i.e. partially allowed and just 5% allowed (**Appendix F, Figure 8**).
- 2.48. In comparison, the national appeal figures published by the Planning Inspectorate for the April 2022 March 2023 show a national appeal success rate for Section 78 appeals of approximately 29% or 71% dismissed (latest figures found published,

 Planning Inspectorate Statistical Release July 2023.pdf (publishing.service.gov.uk)).
- 2.49. Therefore, although our figures include enforcement notice appeals as well as Section 78 appeals it appears that the Local Planning Authority is demonstrating a very good appeal success rate.
- 2.50. Planning Appeals can take a significant period of time to be determined, which is in part dependent upon how long the applicant/their agent takes to submit any such appeal (within the nationally set timescale for submission of an appeal), the complexity of the scheme and the appeal process type, which is in large part decided by the Planning Inspectorate. Therefore, the time taken between ESC issuing a decision, and the determination of any appeal by the Planning Inspectorate lies outside the control of the Local Planning Authority.

- 2.51. It is interesting to note that of the 56 appeal decisions received during this financial year, 39 of them (70%) took more than a year between an ESC decision and the Planning Inspectorate to issue their decision. Of those decisions, 11 (20%) took more than 18 months. A graph showing the time taken between ESC decision and the Planning Inspectorate issuing an appeal decision is included in **Appendix F, Figure 10**.
- 2.52. The time taken for an appeal decision to be issued can be increased by any delay in the applicants/their agents submitting the appeal to the Planning Inspectorate, and therefore the time taken between the appeal being received and the appeal decision being issued is potentially a more accurate representation of the time taken. A graph showing the time taken between appeal received date and PINS Decision is included in **Appendix F, Figure 11**. However, that also shows a significant delay between appeals being received and appeal decisions being issued by the Planning Inspectorate, because 17 of the 56 decisions (30%) took more than a year from receipt to determination, with 4 of those decisions taking more than 18 months from receipt.
- 2.53. When such appeals relate to retrospective Planning Applications and/or Enforcement Notices, the period of time of time taken for a decision to be received from the Planning Inspectorate, can significantly delay any resolution, and associated Planning Enforcement Action, including the time frame for notices to come into effect, and in turn the period for compliance, and then any subsequent action that may be required (see Planning Enforcement section below). The appeal process therefore significantly lengthens the enforcement process and is outside the control of East Suffolk Council.

Planning Enforcement

- 2.54. In considering the role and activities of Planning Enforcement at East Suffolk Council, key consideration should be given to paragraph 59 of the NPPF which states: "
 - "Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate."
- 2.55. Between 1 April 2023 and 31 March 2024, there were 456 new planning enforcement cases logged and 495 planning enforcement cases were closed. Therefore, the team closed more cases than were received during this period. This will have included closing cases received during the previous financial year.
- 2.56. This closure of more cases than opened may be in part a reflection of an additional Assistant Enforcement Officer joining the team in September 2023. This additional team member and assignment to team areas has increased capacity within the Enforcement Team and enabled the alignment of the areas they each cover with Development Management Team Areas, i.e. the North, Central and South Teams.

- 2.57. The cases logged during the financial year were spread across the district, with 42.7% in the north team area, 19.7% in the central team area and 37.6% within the south team area. Although these figures are not a true reflection of the spread, because the central team area was only created in September, so cases logged between April and September were logged as under the former north/south areas, which artificially inflates the apparent figures for those areas.
- 2.58. A fairer way to look at the geographical distribution of cases is by Ward or Parish. During the 2023-24 financial year, the ward with the highest number of planning enforcement cases was Aldeburgh and Leiston, with 36 planning enforcement cases (8% of the total number of cases), and the ward with the lowest number of planning enforcement cases was Rushmere St Andrew with 2 planning enforcement cases (see **Figures 2 and 3 of Appendix H**).
- 2.59. During the 2023-24 financial year, the parish with the highest number of planning enforcement cases was Lowestoft with 59 cases and then Felixstowe was second with 35 cases, which is to be expected given that they are the largest settlements within the district. There were 76 parishes with no planning enforcement cases, which is not dissimilar to the four previous financial years, which had 75, 71, 63 and 69 parishes with no cases each year. Many of those parishes without any cases are the smaller rural parishes, often those of a scale that do not have defined settlement boundaries in the Local Plans (see **Figures 4 and 5 of Appendix H**).
- 2.60. ESC takes Planning Enforcement seriously and if there is found to be a breach, officers will then assess if it is expedient to pursue enforcement action, based upon a number of factors including the level of breach and the material planning harm arising and if planning permission would likely be granted or not were consent to be sought.
- 2.61. However, many cases reported to ESC as potential breaches of Planning Control and logged as Planning Enforcement cases, are in fact not Planning breaches. Between 1 April 2023 and 31 March 2024, 222 of the 495 cases closed were not breaches of control, that is a significant proportion at approximately 45%. This is consistent with the previous financial year during which 455 of closed cases were closed as 'no breach' (see figures in **Appendix J**).
- 2.62. All cases have to be logged and investigated, in order for officers to determine if a breach has occurred or not. This takes significant officer time, not only to log the case on the system and acknowledge receipt to the complainant, but also various investigation steps such as visiting the site, checking the planning history checking planning regulations, internet searches, checking with other ESC teams, land registry checks etc (as appropriate) and in a limited number of cases serving Planning Contravention Notices to obtain information.
- 2.63. The remaining 55% of cases were closed because there was either compliance with planning controls or the unauthorised use ceased (potentially after the serving of a formal notice), planning permission was granted, the works/use were 'Permitted Development', the works/use were immune or lawful, they were duplicate cases, the complaint was withdrawn or it was not expedient to take formal enforcement action.

2.64. In accordance with National Policy Guidance, officers seek to resolve breaches without formal action, which has enabled the closure of most of the above cases. The national guidance states:

"Addressing breaches of planning control without formal enforcement action can often be the quickest and most cost effective way of achieving a satisfactory and lasting remedy. For example, a breach of control may be the result of a genuine mistake where, once the breach is identified, the owner or occupier takes immediate action to remedy it." Source https://www.gov.uk/guidance/ensuring-effective-enforcement

2.65. In deciding to pursue formal Planning Enforcement Action, the authority has to have regard to the considerations set out in the National Planning Policy Guidance, which states:

"Nothing in this guidance should be taken as condoning a wilful breach of planning law. Enforcement action should, however, be proportionate to the breach of planning control to which it relates and taken when it is expedient to do so. Where the balance of public interest lies will vary from case to case. In deciding, in each case, what is the most appropriate way forward, local planning authorities should usually avoid taking formal enforcement action where:

- there is a trivial or technical breach of control which causes no material harm or adverse impact on the amenity of the site or the surrounding area;
- development is acceptable on its planning merits and formal enforcement action would solely be to regularise the development;
- in their assessment, the local planning authority consider that an application is the appropriate way forward to regularise the situation, for example, where planning conditions may need to be imposed"

Paragraph: 011 Reference ID: 17b-011-20140306, Revision date: 06 03 2014, source: https://www.gov.uk/guidance/ensuring-effective-enforcement

- 2.66. In order to take action, it therefore has to be appropriate to take such action i.e. where there is a clear breach of planning control and it is expedient to issue a notice/take action, taking into account the development plan and any other material planning considerations.
- 2.67. During the 2023-24 financial year, 9 planning enforcement notices were served, comprising 5 Enforcement Notices in relation to Operational Development, 3 Enforcement Notices in relation to Changes of Use and 1 temporary stop notice (Figure 2 of Appendix K).
- 2.68. Prior to proceeding with the serving of a formal notice, the Local Planning Authority has to have sufficient evidence of an ongoing breach of Planning Control. Evidence has to be gathered in a certain way, which in most cases takes significant time and sometimes we have to gather evidence over several weeks or months due to the nature of the breach.
- 2.69. Retrospective applications can be submitted which generally have to be determined before any potential formal action, and if consent is refused there is a right of appeal, which can further extend the process.

- 2.70. When serving notices a reasonable time has to be given for them to come into effect, along with a reasonable compliance period for the breach to be rectified. The time periods for a notice to come into effect and compliance, are very case dependant, as they have to be reasonable in terms of enabling the breach to be rectified, so a large breach where significant building works have to be undertaken and/or large volumes of materials removed from the site would be given longer than a significantly smaller scheme such as an unauthorised fence.
- 2.71. Those who have had an enforcement notice served, have the right to appeal to the Planning Inspectorate. These appeals generally take significantly longer than planning decision appeals. In 2020-21, enforcement related appeals took an average of 46 weeks (Figures from Planning Inspectorate statistical release 20 January 2022 GOV.UK (www.gov.uk).
- 2.72. During the 2023-24 financial year there were 6 enforcement related appeal decisions for the East Suffolk Council area, which between them took a total of 3,012 days between ESC serving an enforcement notice and an appeal decision being issued, which equates to an average of 502 days (or 71.7 weeks or 1.4 years) per decision. This is significantly longer than the average reported nationally for 2020-21.
- 2.73. Whilst an appeal decision is awaited on an Enforcement Notice, the pursuit of an action is in effect put on hold, and East Suffolk Council as Local Planning Authority is unable to pursue compliance from the site owner/operator, and therefore these delays in such appeal decisions being made, significantly lengthens the planning enforcement process.
- 2.74. If the appeal is dismission (i.e. the notice upheld) and the site owners and/or those with an interest in the land do not comply with the requirements of the notice (either without an appeal, or following a dismissal on appeal), then legal processes start, which are very dependent upon court dates etc. If the breaches continue, and they are in breach of any requirements set by the court then the legal process continues and is further dependent upon court dates etc.
- 2.75. A report summarising and providing updates on all live cases on which a notice has been served is included on the agenda to every North and South Planning Committee.
- 2.76. The Enforcement Performance Report also on this agenda includes details of the numbers of enforcement cases received, enforcement cases closed, reasons for closure, time taken to close cases and the Enforcement Notices Served between 1 January 2023 and 31 March 2024.
- 2.77. There is also Enforcement Progress Report on this agenda, explaining the current position and future intentions in terms of improvements to internal processes and use of software etc in relation to Planning Enforcement matters.
 - <u>Freedom of Information Requests (FOIs), Environmental Information Requests (EIRs) and other requests for information</u>
- 2.78. Between 1 April 2023 and 31 March 2024, Planning Services received 22 FOI requests and 87 EIR requests, along with 2 Subject Access Requests (SAR)received (1 released in

full and 1 closed because requester did not respond when asked to provide ID/clarification), and 2,702 personal searches (i.e. those usually undertaken for property sales/ purchases).

- 2.79. As shown in the graphs in **Appendix M, Figures 1 and 2**, there were significantly more EIR requests than FOIs, and the requests were throughout the year. Of these requests, 29.9% were refused, 40.19% were partially released and 29.9% were released in full. Given the proportions refused or only partially released, and that such requests can only be refused or partially refused for limited reasons, it appears that at least some of these requests are either seeking information not covered by the FOI/EIR process and/or are requests that would be too onerous in terms of the vast quantity of data being sought.
- 2.80. Dealing with such requests and the collation of the requested documents, and redaction of personal contact details and other sensitive data, takes significant Planning Services Officer time. Unfortunately, the time taken was not recorded on all the FOI and EOR cases during this period, but of the 23 cases it was recorded there was an average of approximately 2 and a half hours per request, although from experience officers know that some requests take significantly longer than 2 and a half hours. Assuming a similar length of time on all the FOI and EIR, that would equate to 272.5 half hours of officer time over the year, (or more than 11 days (24-hour period days)). This is a lot of officer time that is take away from dealing with applications, pre-application enquires, enforcement cases etc.
- 2.81. However, we have to deal with and respond to such requests, and in order to make data accessible to the public, East Suffolk Council already publishes a lot of its live and historic Planning Application data online including most planning decision notices from 1948 onwards for the former Suffolk Coastal District area, and from the 1970's onwards for the former Waveney area, with the plans and associated documents also online via Public Access for most of the applications received during the past 11 years. The Public Access system also enables customers to undertake 'advanced searches' to retrieve data on numbers of/ details of specific application or development types. The introduction of the Developer Contribution Dashboard has also significantly reduced the number of EIR/FOI requests or allowed much swifter responses to be provided, ensuring that data on Section 106 obligations and funding and Community Infrastructure Levy is up to date, publicly available and transparent.
- 2.82. Therefore, some of these requests can be responded to explaining how the customers can access the data themselves, but based upon officer experience it appears many are requesting copies of officer correspondence or similar information not published online in relation to recent applications. It may be that the requesters disagree with the decision to approve or refuse such schemes. Such requests cannot reasonable be avoided because it would be inappropriate to publish all correspondence and other certain information online.

Formal Complaints and Complements

2.83. Planning and particularly the application process can be an emotive process, and there are always likely to be those that do not agree with the outcomes/decisions made by the Local Planning Authority to either refuse or grant planning consent. Whilst applicants

have a right of appeal to the Planning Inspectorate, third parties have no such right of appeal. The only which they can change the outcome would be through a legal challenge on the grounds of a failure in the decision-making process itself. Such a challenge can be very expensive and still may not overturn a decision to grant consent.

- 2.84. Understandably, third parties who have objected to a scheme that has subsequently been approved, may not wish to or are unable financially to mount a legal challenge (or there are no grounds for such a challenge to be made). Therefore, they can see making a formal complaint as their only reasonable recourse, even though the formal complaints process will not undue a formal planning decision that has been made.
- 2.85. Others will submit a formal complaint for a variety of reasons which can include they feel they have not considered an appropriate level of customer service through the process or because they disagree with a decision to close an Enforcement Investigation.
- 2.86. Formal complaints related to Planning Services are investigated and responded to in accordance with East Suffolk Council's adopted complaints procedure (as summarised on <u>Customer services » East Suffolk Council</u>). Initial complaints are logged as Stage 1, and investigated by a team leader or manager, who provides a response to the customer, usually within 15 working days.
- 2.87. A further complaint relating to the same issue by the same customer received within 1 month of the date of the Stage 1 reply, is logged as a Stage 2 compliant, which is investigated and responded to by a Senior Manager, Head of Service or Director, usually with 20 working days.
- 2.88. Between 1 April 2023 and 31 March 2024, there were 37 Stage 1 complaints received. Of those Stage 1 Complaints investigated and concluded during that time, 71% were not upheld (**Appendix M, Figure 6**).
- 2.89. The remainder were partially upheld (12%) or Upheld (17%). Of those that were upheld, 3 were related to the customer journey, 2 related to fulfilment of promised actions and 1 related to adherence to policy (Appendix M, Figure 7). Those partially upheld were for reasons related to the clarity or fairness of decision, or customer journey.
- 2.90. The findings of the Stage 1 complaints are set out in **Appendix M, Figure 9**, which shows that in 24 cases the Council was found not to be at fault and there were no learning requirements as a result.
- 2.91. During the monitoring period there were 38 requests for Stage 2 review. All were investigated and closed as 'original decision stands', i.e. they were in agreement with the findings of the Stage 1 investigations.
- 2.92. If the customer is still not satisfied with the Stage 2 response they can then complain to the Local Government and Social Care Ombudsman (LGSCO). In the case of planning application decisions, the LGSCO cannot overturn the Planning decision to approve or refuse consent, but if they find fault can potentially require the Local Planning Authority to provide an apology and/or make a payment to the customer.

- 2.93. Between 1 April 23 and 31 March 2024, there were 9 complaints to the Ombudsman in relation to Planning Application and Planning Enforcement Matters. In 8 of these cases the Ombudsman undertook initial inquiries and then closed the cases. The explanations for closure primarily state that they would not investigate further as they considered either:
 - they were unlikely to find fault or evidence of fault by the Council sufficient to warrant an investigation, or
 - there is not enough evidence of fault affecting the planning outcome, or
 - that they did not consider the complainant had suffered significant personal injustice as to warrant further investigation, or
 - that the area of any potential fault would fall outside their jurisdiction.
- 2.94. In relation to the one complaint on which the Ombudsman found fault, the issue was related to an error with the information on the Council's website about the expiry date of a prior notification permission. However, they did not consider this caused injustice to the customer because they would have had to submit a planning application for the works undertaken regardless of this error. They also acknowledged that the Council had already corrected the information on its website and decision notice template at the time of the Ombudsman investigation.
- 2.95. The team also receive complements, although as to be expected as there is generally less motivation to compliment than complaint, there were far fewer complements. During the 2023-24 period, the team received 2 formal compliments, which are complimentary about the service provided and the assistance provided by officers.

3. Proposal

3.1. These figures should continue to be monitored on a quarterly basis.

4. Financial Implications

- 4.1. As explained in the <u>previous Planning Performance Report to Strategic Planning Committee in January 2024</u>, the planning application fees were increased on 6

 December 2023 through <u>The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023

 (legislation.gov.uk) and those regulations also amended Town and Country Planning Development Management Procedure Order 2015 (as amended), to introduce a 16 week planning guarantee.</u>
- 4.2. This means where a planning application takes longer that the statutory time periods (i.e. 13 weeks for Major and 8 Weeks for Non-Major) and an extension of time has not been agreed with the applicant, the Planning Guarantee applies.
- 4.3. This means that if a Major application is not decided within 26 weeks or a Non-Major within 16 weeks, and where no extension of time has been agreed, or appeal against non-determination been submitted, then the fee paid by the applicant will be refunded to them.

- 4.4. Therefore, the Local Planning Authority needs to ensure to ensure that planning applications are determined within the set timescales or agree extensions of time in order to minimise the potential risk for fees to be refunded on such applications.
- 4.5. However, it should be noted that applications can potentially be refused if the applicants are deliberately trying to delay the determination or refuse to agree an extension of time in order to seek to secure a refund. National Planning Policy Guidance is clear that applicants should not attempt to delay a decision on their application simply to obtain a fee refund and that a Local Planning Authority will be justified in refusing permission when an applicant causes deliberate delay and has been unwilling to agree an extension of time Determining a planning application GOV.UK (www.gov.uk).

5. Legal Implications

- 5.1. If a planning application is not determined within the eight- or 13-week target time, or within an agreed extension of time, then the applicants have a right to appeal to the Planning Inspectorate, who would then be the determining authority for that planning application.
- 5.2. However, it should be noted that planning applications do not obtain deemed consent if they are not determined in time. The eight- and 13-week time frames for determination are important for ensuring that the not only the decision on each application remains with the Local Planning Authority, but ensuring that the government targets are met for the two-year monitoring period process, so that wider determination powers remain with the Local Planning Authority.
- 5.3. Prior Notification applications which do not form part of this two-year monitoring period process, because they are not Planning Applications, also need to be determined within time, because if the proposals meet the criteria to be Permitted Development subject to the Prior Notification Process (as set out in the The Town and Country Planning (General Permitted Development) (England) Order 2015 (legislation.gov.uk)), are not determined within the set timescale or an agreed extension of time, they can obtain deemed consent, which means works can go ahead outside the control of the Local Planning Authority.

6. Risk Implications

- 6.1. If the Local Planning Authority fails to meet the rolling two-year rolling monitoring period targets for the determination of Planning Applications, it can be put into special measures by the Secretary of State, which could mean that all or some of its decision making powers for applications could be removed, and applicants would have the option to apply directly to the Planning Inspectorate, removing the local decision making process for such applications.
- 6.2. Therefore, it is important that these quarterly figures continue to be monitored to ensure that the Local Planning Authority remains on track to meet the 2-year monitoring period targets.

- 6.3. Whilst as set out in the <u>Planning Appeals</u> section of this report, the Local Planning Authority is performing well in terms of its appeal performance, and there were not appeals for awards of costs in this financial year, the Local Planning Authority must remain prepared to defend at refusal it issues and act reasonably in doing so, to ensure that it does not leave itself open to a costs application being awarded against it.
- 6.4. In terms of Planning Enforcement, the risks of development becoming potentially immune from action if the Local Planning Authority fails to investigate and take formal action if/when required should be recognised. However, the time periods for immunity in terms of breaches are 4 years or 10 years (depending upon the nature of the breach and when it occurred as the legislation changed earlier this year), and therefore this time reduces the risk of such breaches becoming immune.
- 6.5. The team continues to seek to investigate and resolve or take action (if appropriate) on breaches of planning control as swiftly as possible whilst meeting the requirements of national legislation and according with the East-Suffolk-Planning-Enforcement-Policy.pdf (eastsuffolk.gov.uk).

7. Options

7.1. There aren't any options other than to continue to monitor the quarterly figures, and seek to address any potential issues if or as and when they arise.

8. Recommendations

8.1. That the report concerning the performance of the Development Management Team in terms of the speed of determining planning applications is noted.

9. Reasons for Recommendations

9.1. These figures form part of the Local Planning Authority's statutory returns to government, and it is important to monitor these figures, to ensure that the Local Planning Authority remains on track to meet the two-year rolling monitoring period targets, to ensure that performance remains at a level above the minimum threshold, so that the Local Planning Authority does not become at risk of being put in special measures.

10. Conclusions/Next Steps

10.1. Strategic Planning Committee should continue to receive these quarterly monitoring reports.

Areas of consideration comments

Section 151 Officer comments:

The Section 151 Officer has received a copy of the report and has no further comments'

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Safeguarding:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Crime and Disorder:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

As Legal Services are the determination team for Certificate of Lawfulness (with input from the Development Management Team, who also manage the process), they have a significant effect upon the timeframes for the determination of such applications, and therefore the performance of such applications.

The Legal Services Team are also involved in legal agreement, which can be required for some planning applications, and therefore they also affect the timescale for the determination of such applications (along with outside factors).

Residents and Businesses consultation/consideration:

Not applicable to the statistics presented in this report

Appendices:		
Appendix A	Numbers of different types of planning related applications	
	determined by quarter between 1 April 2023 and 31 March 2024	
Appendix B	Numbers of each type of 'Planning Application' determined per	
	quarter between 1 April 2023 and 31 March 2024	
Appendix C	Numbers of various types of non-planning applications (but planning	
	related) and Prior Notification/Approval applications, determined by	
	quarter between 1 April 2023 and 31 March 2024	
Appendix D	The determination outcomes of 'Planning Applications' determined by	
	quarter between 1 April 2023 and 31 March 2024	
Appendix E	The timeliness of 'Planning Decisions in terms of application scale'	
Appendix F	Outcomes of Appeals between 1 April 2022 and 31 March 2024	
Appendix G	Numbers of Planning Enforcement Cases received/Logged	
Appendix H	Geographical Distribution of logged Enforcement Cases	
Appendix I	Numbers of Enforcement Cases Closed	
Appendix J	The Reasons Enforcement Cases were closed between 1 April 2019	
	and 31 March 2024 shown per month	

Appendix K	Numbers of Enforcement Notices Served	
Appendix L	Timeframes for the closure of enforcement case	
Appendix M	The number of Freedom of Information Requests and Formal	
	Complaints related to Development Management and Planning	
	Enforcement for the period 1 April 2023 – 31 March 2024	

Background reference papers:		
Date	Туре	Available From
8 July 2024	Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024	CMIS > Meetings
8 April 2024	Planning Performance Report – October to December 2023	CMIS > Meetings
8 April 2024	Enforcement Performance Report – October to December 2023	CMIS > Meetings
8 January 2024	Planning Performance Report – July to September 2023	CMIS > Meetings
8 January 2024	Enforcement Performance Report – July to September 2023	CMIS > Meetings
2 October 2023	Planning Performance Report – April to June 2023	CMIS > Meetings
2 October 2023	Enforcement Performance Report – April to June 2023	CMIS > Meetings
3 July 2023	Planning Performance Report – January to March 2023 And Appendices (Includes annual and quarterly figures for April 2022 – March 2023, including those in the quarterly performance reports for that financial year)	CMIS > Meetings
6 June 2022	Planning Performance Report – April 2021 to March 2022 (Includes annual and quarterly figures for April 2021 – March 2022, including those in the quarterly performance reports for that financial year)	CMIS > Meetings
7 June 2021	Planning Performance Report and Appendices	CMIS > Meetings
4 June 2020	Development Management Performance Report	CMIS > Meetings
March 2019	East Suffolk Council Local Planning Enforcement Plan	East-Suffolk-Planning- Enforcement-Policy.pdf (eastsuffolk.gov.uk)



Committee	Strategic Planning Committee	
Date	08/07/2024	
Subject	Appeal Performance Report - 11 March 2024 to 4 June 2024	
Cabinet Member	Councillor Kay Yule	
	Cabinet Member with responsibility for Planning and Coastal Management	
Report Author(s)	Katherine Scott	
	Principal Planner (Development Management, Technical Lead)	
	katherine.scott@eastsuffolk.gov.uk	
Head of Service	Ben Woolnough	
	Head of Planning, Building Control and Coastal Management	
	ben.woolnough@eastsuffolk.gov.uk	
Director	Nick Khan	
	Strategic Director	
	nick.khan@eastsuffolk.gov.uk	

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	Not applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

This report and attached appendix contain statistics and summaries of planning related appeal decisions received, as a means to monitor the quality of decisions made by the Local Planning Authority and identify any key learning points to improve future decision making.

Recommendation(s)

That Strategic Planning Committee note the report concerning the appeal performance of the team and the attached appendix containing summaries of appeal decisions.

Strategic plan How does this proposal support Our Direction 2028?		
Environmental Impact	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application and appeal process has to consider the material planning impacts upon the environment.	
Sustainable Housing	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application and appeal process and the planning policies which are used to determine such applications seeks to ensure the provision of sustainable housing.	
Tackling Inequalities	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application and appeal process and the planning policies which are used to determine such applications, seek to support communities, and the provision of facilities which can be beneficial including community buildings, open space and facilities for physical and mental health wellbeing.	
Thriving Economy	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application and appeal process and the planning policies which are used to determine such applications, seek to support appropriate economic development within the district.	
Our Foundations / governance of the organisation	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors.	

Justification for recommendations

1. Background

- 1.1. This report provides an update on the planning performance of the Development Management Team in terms of the quality and quantity of appeal decisions received from the Planning Inspectorate.
- 1.2. The applicant has a right to appeal to the Planning Inspectorate when East Suffolk Council as Local Planning Authority refuses a planning application or planning related application (e.g. listed building consent), when they do not agree with a condition(s) imposed on a consent, or when an enforcement notice is served on them.

2. Introduction

- 2.1. The report is presented to Members as rolling reporting mechanism on how the Council is performing on the quality of decisions by reporting on appeal decisions received from the Planning Inspectorate.
- 2.2. A total of 15 planning related appeal decisions, have been received from the Planning Inspectorate since 11 March 2024 following a refusal of planning permission or other planning related decision or the serving of a Planning Enforcement Notice by East Suffolk Council.
- 2.3. A summary of all the appeal decisions received is appended to this report (Appendix A).
- 2.4. The Planning Inspectorate monitor appeal success rates at Local Authorities and therefore it is important to ensure that the Council is robust on appeals, rigorously defending reasons for refusal. Appeal decisions also provide a clear benchmark for how policy is to be interpreted and applications considered.
- 2.5. The national appeal figures published by the Planning Inspectorate for the April 2022 March 2023 show a national appeal success rate for appeals related to applications for planning permission of approximately 29% or 71% dismissed (latest figures found published, <u>Planning Inspectorate Statistical Release July 2023.pdf</u> (publishing.service.gov.uk)).
- 2.6. Of the 13 Planning Appeals (i.e. those against refusal of planning permission), there were no appeal decisions received against Majors, 9 against Minors and 4 against Others. Of these decisions 7 of the decisions were dismissed (54 %) and 6 of the decisions were allowed (46 %) by the Planning Inspectorate. Whilst these figures represent a lower dismissal rate than the national average, these figures are only for a relatively small number of cases received within a short period of time.
- 2.7. A longer-term view with more decisions should be taken in order to have a more accurate picture of appeal performance. That is provided in the section relating to appeals within the Planning Performance Report that is also on the agenda for this

meeting. As set out in paragraph 2.47 of that report, 89% of the appeal decisions received for the East Suffolk area during the 2023-24 financial year were dismissed, which is significantly above the national figures referred to above.

- 2.8. All of the cases on which appeal decisions were received during this reporting period, related to planning applications or planning related applications that were determined at officer level in accordance with the scheme of delegation.
- 2.9. There were no appeals against conditions on Planning Permissions, and no appeals against the refusal of applications seeking to remove or vary conditions.
- 2.10. There was one appeal against the refusal of applications seeking Prior Notification Approval, which related to a change of use and physical works under Class R of Part 3 of the General Permitted Development Order. It was dismissed.
- 2.11. There were no appeals in relation to Prior Notification under other Parts of the General Permitted Development Order during this period.
- 2.12. In terms appeals against applications for Advertisement Consent, there was one appeal decision which was dismissed.
- 2.13. During this period there were no appeals against refusals of applications for Listed Building Consent, or Certificate of Lawfulness, or Enforcement Notices, or Community Infrastructure Levy (CIL) decisions.
- 2.14. As part of the appeal process, applicants can seek an award of costs against the council. There were no such applications for costs during this recording period, which is consistent with the previous financial year, during which there were also no cost decisions.
- 2.15. In terms of the key outcomes of the reported appeals, the matters of particular note are:
 - There is a need for rural workers dwellings to demonstrate a functional need and meet a financial test, in order to be justified on sites in the countryside, even if the dwelling is in the form of a caravan (Red House Farm, Bucklesham on page 11 of Appendix A).
 - The appeal decision relating to replacement windows at 401 London Road South, Lowestoft (page 21 of Appendix A), and the remarks of the inspector regarding the Article 4 direction are of particular interest given the recent reviews that have been undertaken in relation to that Article 4 area. The Inspector agrees with the approach that the replacement of the timber sash windows with uPVC should be resisted and that the relevant local plan policy along with the Article 4 have the potential to real improvement to the character and appearance of the area over time.
 - The appeal decision relating to the Prior Notification under Class R of Part 3 of Schedule 2 of the General Permitted Development Order (page 30 of Appendix A) concludes that for the purposes of such applications, physical works undertaken towards the change of use of a building can amount to a change of use having

commenced even if the building isn't currently occupied. In such instances, works to alter the building in such a way mean that it can no longer be used for agricultural purposes, which breaches the conditions set out for the conversion of agricultural buildings as set out in the General Permitted Development Order.

• The appeal decision relating to the barn conversion at Little Kyson Barn is interesting in the weight it gives to the benefit to the landscape of retaining a rural building through its conversion, even though the barn is unobtrusive and largely hidden amongst woodland i.e. in the view of the Inspector the building in this context does not need to be visible to make a positive contribution to the landscape (page 8 of Appendix A). Whilst this approach contrasts with that of the Rural Development Supplementary Planning Guidance, it may be the direction in which the approach to the conversion of rural buildings is headed, given the recent changes to the Permitted Development Rights in Class Q of Part 3 of Schedule 2 of the General Permitted Development Order.

3. Proposal

3.1. The outcomes of appeals should continue to be monitored on a quarterly basis.

4. Financial Implications

4.1. There are no direct financial implications arising from the appeal statistics and outcomes included within this report. The only financial implications that would arise from planning appeal decisions would be the potential award of costs, and/or any costs of pursuing compliance with any enforcement notices that are upheld (i.e. the appeal's dismissed).

5. Legal Implications

5.1. There are no direct legal implications arising from the appeal statistics and outcomes included within this report.

6. Risk Implications

6.1. There are no direct risk implications arising from the appeal statistics and outcomes included within this report. The only risk implications that could arise from planning appeals relate to the financial matters outlined above, and the potential for consents to be granted contrary to the view of the Local Planning Authority, and when some schemes are permitted on appeal it can be more difficult to secure benefits and controlling mechanisms that may have been granted were the scheme to have been granted at a local level.

7. Options

7.1. None. The appeal decisions should continue to be monitored and reported through these quarterly reports.

8. Recommendations

8.1. That the report concerning the appeal performance of the team and the attached appendix containing summaries of appeal decisions be noted.

9. Reasons for Recommendations

9.1. These figures enable the Local Planning Authority's performance to be monitored, and the presentation of the key points of appeal decision, enable the identification of key learning points, enabling improvement of decision making.

10. Conclusions/Next Steps

10.1. Strategic Planning Committee should continue to receive these quarterly monitoring reports.

Areas of consideration comments

Section 151 Officer comments:

The Section 151 Officer has received a copy of the report and has no further comments'

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Safeguarding:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Crime and Disorder:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

The Legal Services team are involved in the drafting of notices and determination of Certificate of Lawfulness applications, both of which can be the subject of appeal. The team are also involved when other forms of planning appeal follow the Inquiry process route.

Residents and Businesses consultation/consideration:

Residents and businesses adjoining application sites for planning applications, are consulted on those applications. Those who have commented on such applications are also notified when an appeal is received.

Appendices:

Appendix A Summary of Appeal Decisions received during this reporting period.

Background reference papers:

None



Committee	Strategic Planning Committee
Date	08/07/2024
Subject	Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023- 2024
Cabinet Member	Cllr Kay Yule
Report Author(s)	Katherine Scott
	Principal Planner (Development Management, Technical Lead)
	katherine.scott@eastsuffolk.gov.uk
Head of Service	Ben Woolnough
	Head of Planning, Building Control and Coastal Management
	ben.woolnough@eastsuffolk.gov.uk
Director	Nick Khan
	Strategic Director
	nick.khan@eastsuffolk.gov.uk

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	n/a
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

This report publishes the quarterly and annual figures for the number of 'Planning Applications' and Planning related applications determined within government targets or agreed extensions of time within the most recently completed financial quarter.

Recommendation(s)

- 1. That Strategic Planning Committee notes this report in respect of the performance of the Development Management Team in terms of the speed of determining planning applications.
- 2. Recommends to Full Council that when considering the calendar of meetings for Municipal Year 2025/26, the start time for Planning Committee North and Planning Committee South be moved from 14:00 to 9:30.

Strategic plan	
How does this proposal	support Our Direction 2028?
Environmental Impact	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the decision makers have to consider the material planning impacts upon the environment.
Sustainable Housing	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the planning policies which are used to determine such applications seeks to ensure the provision of sustainable housing.
Tackling Inequalities	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the planning policies which are used to determine such applications, seek to support communities, and the provision of facilities which can be beneficial including community buildings, open space and facilities for physical and mental health wellbeing.
Thriving Economy	The statistics presented in this report are not directly applicable to the this. However, it is recognised that the planning application process and the planning policies which are used to determine such applications, seek to support appropriate economic development within the district.
Our Foundations / governance of the organisation	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors.

Justification for recommendations

1. Background

- 1.1. This report provides Members of the Strategic Planning Committee with an analysis of the work of the three planning committees and the Referral Panel for decisions in the year from April 2023 to March 2024.
- 1.2. As per the reports in June 2022 and July 2023, the reporting for this matter now provides far greater depth and analysis led by oversight of the process by Katherine Scott, Principal Planner (Technical Lead).
- 1.3. This remains important to understand the effectiveness and efficiency of decision making and to maintain public confidence in the scrutiny and accountability the Planning Committees and Referral Panel provide.
- 1.4. Importantly this also provides an annual review of the involvement of Ward Members and Town and Parish Councils in the planning process.
- 1.5. The recommendation of this report also asks the Strategic Planning Committee to discuss the timing of the start of Planning Committee meetings in order to understand the desires of members for the next municipal year and whether any change is desired. To enable the debate, a 09.30am start time for Planning Committee South and Planning Committee North is recommended for approval. However, officers are not committed to this proposal but wish for members to have the opportunity to discuss a proposed change in time.

2. Introduction

- 2.1. This section of the report explains the process routes by which planning applications are determined at East Suffolk Council (i.e. Delegated, Referral Panel Committee etc), and provides data on how many planning applications have been determined via each route during the financial year 2023 to 2024.
- 2.2. Data and analysis are also provided on the outcomes of those applications, the level of involvement of ESC Members and Town/Parish Councils in the different determination process routes, and the time frame implications of those processes.
- 2.3. This report relates to Planning Applications, which are defined into three scale categories, which are defined at a national level, and these are the terms used in this report when referring to different scale of applications.
- 2.4. In terms of the applications that East Suffolk Council deals with as Local Planning Authority at a district Council, they are defined as:
 - 'Major':
 - o 10 or more dwellinghouses, or

- a site area of 0.5 hectares or more where the number of dwellinghouses is unknown, and/or
- the floorspace to be created is 1,000sqm or more, and/or o the site area is 1 hectare or more.

• 'Minor'

- 1 − 9 dwellings, o A site area of up to 0.5 hectares where the number of dwellings is unknown,
- Up to 1,000sqm of floorspace (excluding works to existing dwellings), and/or
- o The site area is less than 1 hectare.

'Other'

- Works to existing dwellinghouses, often referred to as Householder applications, and
- Changes of use where no additional floorspace is created.
- 2.5. This report is intended to be read as a whole, but this 'Introduction' section is split into the following sub-sections to aid in navigation and finding the specific information relating to the current situation and statistics relating the 2023-24 financial year:

Scheme of Delegation

This section explains the current scheme of delegation including the addition of the 'call in process' introduced earlier this year. It also explains the proportion of Planning Applications determined via Planning Committee (3.6%), at officer level following delegation from the Planning Referral Panel (8.5%) or at officer level without triggering the Planning Referral Panel or Planning Committee (87.9%).

Planning Committees

This section provides information on the proportion of cases which were triggered to Planning Committee by being called in by the Head of Service (24%), called in by the Planning Committee Chair/vice Chair (3%), because ESC were the applicant or land owner (29%), because the applicant or agent was an ESC Elected member or member of staff or close relative (6%), or referred to Planning Committee by the Planning Referral Panel (38%). It also explains the time taken in planning committee meetings, and geographical spread of applications determined at Planning Committee.

Planning Referral Panel

This section explains the Planning Referral Panel process, and examines the number of applications triggering the process (160), the scale of those applications (70 Minor and 80 Other Planning Applications, and 10 that technically didn't trigger but accompanied an associated planning application that did trigger), the geographical spread of those cases in terms of the North/South Planning Committee areas, the wards and the parishes applications at the panel were from, including identifying those towns/parishes with the most items at the panel (Felixstowe and Lowestoft with 13 items each, closely followed by Southwold and Walberswick, with 11 each). Details are also provided on the proportion of applications the panel referral to planning committee for determination (20%).

Involvement of Ward Members

This section explores the level of involvement of Ward Members during the planning application process. It sets out the opportunities they have to be involved and looks at the level of formal comments received from members on applications at the Planning Referral Panel (11.3%), attendance at Planning Referral Panel meetings (36% of Ward members attended at least one Panel meeting) and the proportion of items at Planning Committee Meetings on which a Ward Member spoke (17.8%). These figures are also explored in more detail in terms of the geographical variations and in terms of ward members speaking at planning committee, the variation that occurs between the different reasons items were triggered to committee.

Involvement of Town/Parish Councils

This section assesses the involvement of Town and Parish Councils during the planning application processes. As with the Ward Member section above, it sets out the opportunities they have to be involved in the process and explores the level and types of comments receive that trigger items to the Planning Referral Panel (99.4% of items at the Panel had comments from the Town/Parish council). The number of items on which Town/Parish Councils attend to speak at Planning Committee meetings is also explored (31.1% of items), along with the variation that occurs between the different reasons items were triggered to committee.

• Involvement of Statutory Consultees

Comments from Statutory Consultees can trigger the Planning Referral Panel Process, and therefore this section explores the number of items at the Panel with comments from Statutory consultees contrary to the minded to views of officers.

Involvement of Third Parties

Third Parties can attend Planning Committee meetings to speak on applications, and therefore this section examines the number of items on which this opportunity is taken up (18.89%), and how this seems to vary depending upon the reason the application has been triggered to Planning Committee.

Outcomes of applications

Whichever process route a planning application takes i.e. Planning Committee for which ever trigger reason or delegated with or without the Planning Referral Panel process, all applications are generally either approved or refused by the Local Planning Authority, with the only exceptions being if applications are withdrawn by the applicants or if they submit an appeal against non-determination. This section therefore looks at the outcomes of applications via the different process routes.

Appeal outcomes of applications

This section overlaps with the Planning Performance Report also on this agenda and explains that of the 73 appeal decisions received 89% were dismissed, and that there are no concerns regarding the decisions being made.

• <u>Time Implications of Process</u>

Each of different determination process routes can have implications in terms of the time it takes to determine an application. Therefore, this section examines the time implications both in terms of that spent in meetings but the potential delays they can have upon the determination of applications, and the resulting implications upon proportion of planning applications that are determined within government set 8 or 13 week targets or agreed extensions of time. It identifies that 97% of applications determined via Planning Committee were determined out of time (i.e. beyond the 8 or 13 week target), and that in terms of applications that triggered the Planning Referral Panel and were then delegated back to officers 37% were issued out of time, with 51% only being classed as in time due to an agreed extension of time. However, the importance of the Panel and Committees to the democratic process is recognised, and that ideally there would be more participation in those processes.

• The start time of North and South Planning Committees

This section recommends that the Strategic Planning Committee discuss the timing of the start of North and South Planning Committee Meetings. The suggestion is for a start time of 9:30am, although officers are not committee to this time, and wish members to have the opportunity to discuss a proposed change in time. This discussion is recommended in part due to the number of cases that have been set for committee consideration during some months requiring extraordinary committee meetings, as not all items could be included on the agenda for existing meetings with an afternoon start.

Scheme of Delegation

- 2.6. The Scheme of Delegation for Planning Applications is set out in Section E Appendix 1 of the East Suffolk Council Constitution. For ease of reference, a copy of the relevant extract is included in **Appendix A, Figure 1** to this report.
- 2.7. The Scheme of Delegation for Planning Applications delegates the determination of all applications unless 1 of 5 triggers are met. These triggers can be summarised as:
 - Direct Call-in/referral to Planning Committee by the Head of Service or by the Chair/Vice-chair of the Planning Committee,
 - The applicant or landowner is East Suffolk Council (ESC),
 - The applicant or agent is an ESC Councillor or ESC Employee, or close relative of either,
 - The Planning Referral Panel Process is triggered and they refer the item to
 Planning Committee for determination (further details are in <u>Planning Referral</u>
 <u>Panel</u> section of this report).
 Or
 - Within the consultation period a contrary position to the officer recommendation is received from the Town/Parish Council and a request for Committee is received from a relevant ward member, triggering the member call in process.

- 2.8. A diagram explaining the routes applications meeting these triggers follow is included in **Appendix A, Figure 2**.
- 2.9. During the 2023-2024 financial year, 3.6% of Planning Applications were considered at Planning Committee, 87.9% were determined by Officers without triggering the Planning Referral or Committee Process and the remaining 8.5% triggered the Planning Referral Panel Process and were delegated to officers for determination.
- 2.10. The inclusion of the democratic process through the Planning Referral Panel Process and the Planning Committee Process has to be balanced with providing an efficient and effective planning service that is able to meet the required national targets for timeliness of decision making, which is explored further in the Time Implications of Process section of this report and in the Planning Performance which is also on this Strategic Planning Committee meetings agenda.

Planning Committees

- 2.11. As stated in paragraph 32.12.1 of the East Suffolk Councils constitution the Planning Committees are 'Quasi-judicial bodies'. This means they are there to determine Planning Applications on the basis of the consideration of Planning Law, Planning Policy and material Planning Considerations.
- 2.12. No matter which route an application has taken to reach a Planning Committee, and no matter which Planning Committee they are at, they all follow the same procedure during the committee meeting. The procedures for Planning Committee are set out in in Appendix C of the East Suffolk Constitution-A-B-C.pdf (eastsuffolk.gov.uk).
- 2.13. Between 1 April 2023 and 31 March 2024, there were 90 items considered at North, South or Strategic Planning Committee.
- 2.14. As explained in the Scheme of Delegation Section above, applications can reach one of the Planning Committees for determined, via different routes. During this financial year there were (As shown in **Appendix S, Figure 1**):
 - 21 items (24%) were called directly into committee by the Head of Service,
 - 3 items (3%) were called directly into committee by either the Chair or Vice-Chair of the Planning Committee,
 - 36 items (29%) went directly to committee because ESC were the land owners and/or applicant on the application,
 - 5 items (6%) went directly to committee because the applicant or agent was an ESC member of staff or ESC Elected Member, or close relative of either
 - 34 items (38%) triggered the Planning Referral Panel, and were then referred to Planning Committee by the Panel,
 - 0 items (0%) triggered the Planning Committee Call in-process.
- 2.15. As shown in **Figures 1 and 2 in Appendix S**, there is no particularly strong pattern over time as to which route applications took to reach Planning Committee. However, it is noted that all three of the items called in to Planning Committee by the chair or vice-chair were in the earlier part of the financial year (April and July), and there were no

items at Planning Committee due to an ESC Staff/Member connection in November through to March.

- 2.16. It is also noted from the other figures in that Appendix, that all 3 of the items that were called into Planning Committee by the chair or vice-chair were within the North Committee Area (2 in Blundeston and 1 in Oulton Broad (Carlton & Whitton / Blundeston Wards). There were no items reaching Planning Committee via this route within the South Area.
- 2.17. These observations could be purely down to the nature of the applications submitted, and do not necessarily reflect any longer-term patterns. In comparing these graphs to those included in Appendix S of the same report to Strategic Planning Committee from July 2023 (CMIS > Meetings), suggests that these do not indicate longer term trends (although it should be noted that the figures shown in the graphs from last year do not show the same level of detail because the data relating to the reasons items reached planning committee was only collated into 3 categories, not the 6 categories used for the 2023-24 period).
- 2.18. Between 1 April 2023 and 31 March 2024, 52 hours 14 minutes was spent in Planning Committee Meetings (24hrs 56 mins in North Planning Committee, 19hrs 33mins in South Planning Committee and 8 hrs in Strategic Planning Committee).
- 2.19. This is similar to the previous financial year (1 April 2022 to 31 March 2023), during which the Planning Committee met for more than 50 hours, with almost 21 hours in North Planning Committee, almost 23 hours in South Planning Committee and over 6 hours in Strategic Planning Committee.
- 2.20. In addition to the time in formal meetings, considerable time is required in terms of drafting and reviewing reports and recommendations, drafting slides for the PowerPoint presentations, and scheduling meetings, along with additional time following the meetings, to collate minutes, and completing paperwork etc so that planning decisions can be issued.
- 2.21. As illustrated in **Appendix R, Figure 1**, the number of items at Planning Committee North and at Planning Committee South each month is rarely the same. This is to be expected, not only because the North Planning Committee had 53 items compared to the 37 items at South Planning Committee, but also because there is a natural variation in the scale, type and complexity of applications submitted to the Local Planning Authority, along with a variation in the level of public interest in such applications.
- 2.22. The higher number of applications within the North Area, during this financial year, appears to be in part due to the significantly greater number of items reaching Planning Committee from the Southwold Ward than from other wards of the district (illustrated in **Appendix R, Figure 4**). Southwold Ward had 15 items, compared to an average of 3.1 items per Ward.
- 2.23. Based upon the number of items per ward, the South Planning Committee Area appears to have a more consistent geographical spread of items, as the North Area had 5 wards

- without any items at Planning Committee, compared to just 2 wards without items from the South Area (**Appendix R, Figure 4**).
- 2.24. Ward members can attend and speak on applications within their wards at Planning Committee meetings. Their attendance is explored within the <u>Involvement of Ward Members</u> section of this report.
- 2.25. The eventual outcomes/determinations of applications is explored within the <u>Outcomes</u> of applications section of this report.

Planning Referral Panel

- 2.26. The presentation of an application to the Referral Panel can take place as a result of the comments received from either the Ward Member, Town/Parish Council and/or a statutory consultee during the consultation process being contrary to the 'Minded to' recommendation of officers.
- 2.27. The Referral Panel meet every Tuesday and is made up of both the Chairs and Vice Chairs of the North and South Planning Committees. To aid a decision on the route of determination to be made by the Panel, Members are furnished with both a written report and a detailed visual and verbal presentation of the application by officers.
- 2.28. All ward members are also notified each Friday afternoon of the items on the agenda of the meeting scheduled for the following Tuesday and are invited to attend if they wish. This notification takes place via a Teams message on the "Notification of Upcoming Planning Referral Panel meetings" chat, (which all Councillors are members of). A copy of an example of the notification is included in **Appendix D, Figure 1**.
- 2.29. The meetings are undertaken in accordance with the Planning Referral Panel Protocol (Appendix C, Figure 1), so case is presented by officers to the panel, who then have the opportunity to ask questions, then the relevant Ward Member is given the opportunity to confirm if the presentation and answers to the questions were accurate. The Panel then discusses the item and concludes on whether the item should be referred to Planning Committee or delegated to officers for determination. They are not determining the planning application, just the process route it will follow.
- 2.30. All Ward Members, the Town/Parish Council and agent/applicant are also subsequently informed via email by the case officer of the outcome of any relevant items following each Panel meeting. In the case of Ward members this is any applications within their ward and with Town/Parish Councils any applications within their parish.
- 2.31. Between 1 April 2023 and 31 March 2024, there were 160 items at the Planning Referral Panel, which consisted of 70 'Minor' Planning Applications, 80 'Other' Planning Applications, and the remaining 10 items were applications that technically didn't trigger the process but were taken to the panel because the associated planning application triggered (e.g. Listed Building Consent applications). There were no 'Major' applications at the Planning Referral Panel. Further details on the proportions of Minor and Other applications are included in the various **Figures 2 to 9 of Appendix E.**

- 2.32. As shown in **Figure 1** of **Appendix E** 42% of items at the Planning Referral Panel were from the South area and 58% from the North Area. This follows the pattern of the preceding years, during which North has had a higher proportion of the items at Planning Referral Panel for two out of the three years:
 - 1 April 2022 31 March 2023, 53% North and 47% South,
 - 1 April 2021 31 March 2022, 50% North and 50% South,
 - 1 April 2020 31 March 2021, 54% North and 46% South,
 - 1 April 2019 31 March 2020, 55% North and 45% South.
- 2.33. As shown in **Figure 1 of Appendix G**, there were items at the Referral Panel from all wards across the district, although some wards had a significantly greater number of items than others, and they do not necessarily correspond with the larger towns. For example, 'Southwold Ward' had the most with 24 items, but even if the 'Eastern Felixstowe' and 'Western Felixstowe' Wards are combined, that only totals 13 items.
- 2.34. In looking at the number of items at the Referral Panel it is important to consider the number of Planning Applications received in total for each ward, and the proportions of those which triggered the Referral Panel Process (Figures 3 and 4 of Appendix G). It is clear from Figure 4 that the 'Southwold Ward' is clearly triggering a significantly higher proportion of its items to the Planning Referral Panel than any other Ward, and the 'Oulton Broad Ward' triggered the smallest proportion of its items, with the 'Wrentham, Wangford and Westleton Ward' also triggering one of the lowest proportions. This is particularly interesting as the 'Wrentham, Wangford and Westleton Ward' geographically wraps around the 'Southwold Ward', but these figures suggest that there is no correlation between the two wards.
- 2.35. The number of items at each meeting from each ward is shown in the various Figures in **Appendix F**. These graphs shown that most of the Wards who have had more than one item, have had those items triggered to the Planning Referral Panel throughout the year. Therefore, there does not appear to be any seasonal pattern.
- 2.36. There are particular Parishes which appear to be triggering significantly more items than others (**Figure 1 of Appendix H**). As may be expected the largest settlements, Lowestoft and Felixstowe triggered the largest number of items with 13 items each. However, the parishes with the next highest number of items were Southwold and Walberswick, with 11 items each, which indicates despite being significantly smaller than Lowestoft or Felixstowe, they are the Parishes inflating the figures for the 'Southwold Ward' result in it having the highest number of items at the Planning Referral Panel.
- 2.37. The majority of the Parishes with no items at the Referral Panel are the smaller more rural Parishes who tend to have relatively few Planning Applications each year (**Figure 2** of Appendix H).
- 2.38. The numbers/portions of applications triggered to referral panel on the basis of comments from the ward member(s), town or parish council and/or statutory consultees, including which are triggering the most number of items etc are explored in the Involvement of Ward Members, Involvement of Town/Parish Councils, and Involvement of Statutory Consultees sections below. Attendance by Ward Members at

the Planning Referral Panel is also explored in the <u>Involvement of Ward Members</u> section below.

- 2.39. The Referral Panel decides on the determination process route, they do not determine the application itself. The four members vote and can choose to refer to Planning Committee or delegate for determination, or abstain from voting, and the route is determined by the majority vote.
- 2.40. This means that there can be a various combination of 1, 2, 3 or 4 members for each type of vote i.e. 3 panel members could vote for committee and 1 to delegate to officers.

 Appendix E, Figure 12 shows the proportion of each possible vote combination.
- 2.41. The proportion of cases referred to Planning Committee for determination by the Planning Referral Panel, was slightly higher in the 2023-24 financial year at 20% to that of the 2022-23 financial year which was 19%, and higher than the three preceding years, as shown in **Figure 11, Appendix E**.

Involvement of Ward Members

- 2.42. As explained in paragraph 3.8 of the East Suffolk Council's Constitution, the representational role of members is a key part of the planning process, and subject to compliance with the terms of the Members' Code of Conduct, in fulfilling that role members are given the opportunity to:
 - Respond in writing to officers on the merits of the application,
 - Attend any committee meetings for applications in their ward,
 - To make representations to the determining committee.
- 2.43. In addition to the above, officers also notify all members of the agenda of Referral Panel Meetings, and they are provided with a Teams meeting link so that they can attend meetings with items from their Ward (**Appendix D, Figure 1**). They also have the opportunity to take part in accordance with the Planning Referral Panel Protocol (copy in **Appendix C, Figure 1**).
- 2.44. In accordance with paragraph 9.1 of Part B the East Suffolk Council's Constitution, Ward Members are not formally consulted on applications within their Ward because the applications are accessible via the portal/<u>Public Access</u>.
- 2.45. All Ward Members are set up on the <u>Public Access System</u>, so although not sent a formal consultation letter, they receive notifications via email on all valid applications received within the geographical area of their ward. All members are therefore made aware of all applications within their ward and have the opportunity to review and comment on the application. An illustration of the process and the various points they can be involved is included in **Appendix B, Figure 1**.
- 2.46. Ward members have the ability to get formally involved the planning application process at a number of points, as well has being able to contact the case officer directly with any queries or questions. In chronological order of the application process, the formal points at which they can be involved are:

- Submitting formal comments during the consultation period, following their Public
 Access notification of a valid application (see paragraph above), within these
 comments they have the opportunity to explain if they think the application should
 be taken to Planning Committee for determination and if so the reasons why, which
 can in turn trigger either the Planning Referral Panel Process or the Committee
 Member Call-in Process (see Scheme of Delegation Section above for further details)
- If the Planning Referral Panel Process is triggered, they can attend the Planning Referral Panel meeting, and they are notified via a Teams Chat message of which applications are on the agenda every week (see process defined in Planning Referral Panel Section above and in **Appendix D**, **Figure 1**).
- When an application goes to Planning Committee for determination, the Ward Member(s) can attend and speak on that item as part of the process (see explanation of process in <u>Planning Committees</u> Section above).
- 2.47. As explained in the <u>Planning Referral Panel</u> and <u>Scheme of Delegation</u> sections of this report, if the comments of the Ward Member(s) are contrary to the 'minded to' recommendation of officer, the Planning Referral Panel Process is then triggered, unless the ward member(s) also share the views of the Town/Parish Council, in which case the Committee Call-in Process is triggered.
- 2.48. However, there continues to be a limited number of applications at the Planning Referral Panel with comments from relevant Ward Members.
- 2.49. As illustrated in **Appendix J**, Figure 8, the proportion of items at the Planning Referral Panel has consistently remained around the 10% mark for each of the last 4 financial years. This diagram shows the following proportion of items has having written comments of any form from a relevant ward member:
 - 1 April 2023 to 31 March 2024 = 11.3% with comments / 88.7% without comments,
 - 1 April 2022 to 31 March 2023 = 9% with comments / 91% without comments,
 - 1 April 2021 to 31 March 2022 = 7.8% with comments / 92.2% without comments,
 - 1 April 2020 to 31 March 2021 = 7.9% with comments / 92.1% without comments.
- 2.50. These figures and the lack of any items triggering the Committee Member Call-in Process between 24 January 2024 and 31 March 2024, suggests a lack of formal involvement by Ward Members during the consultation period on applications. If Ward Members were submitting written comments during that period, they would likely trigger the Planning Referral Panel Process or Committee Member Call-in Process, and therefore be reflected in the annual statistics for those processes.
- 2.51. As explained in the earlier sections of this report, the Ward Member(s) are also able to attend the Planning Referral Panel meetings, and they are sent the agenda for those

meetings, along with being 'tagged' so that they are made aware when there is an item in their Ward (example copy of notification in **Appendix D**, **Figure 1**).

- 2.52. Between 9 June 2023 and 31 March 2024, 19 (49%) of Planning Referral Panel meetings had elected members other than the panel members in attendance (Appendix P, Figure 1). Although this figure is below 50% it indicates that a significant number of the meetings are being attended by Ward Members.
- 2.53. However, during the same period only 20 (36%) of Elected Members attended at least one Planning Referral Panel Meeting (the other 35 or 64% didn't attend a single Referral Panel Meeting). These figures suggests that it is likely the same members attending more than one meeting during the monitoring period, and that is what is also reflected in the graphs in **Appendix P, Figures 3, 4 and 5**, which show the number and proportion of Referral Panel meetings each member attended.
- 2.54. Some wards had member attendance on multiple occasions, for meetings where there were items in their wards, whilst others have had no members attend a single meeting (Appendix P, Figure 5).
- 2.55. As shown in **Appendix G, Figure 1**, all wards had at least 1 item at the Planning Referral Panel, but as shown in **Appendix P, Figure 3**, 13 of the 29 Wards had no ward member attendance any Referral Panel Meeting.
- 2.56. Between the adoption of the Committee Call-in process on 24 January 2024, and 31 March 2024, there were no applications triggering that process. However, the process has since been triggered, and data is being collected for those items for monitoring purposes, so can be included in future reports of this nature.
- 2.57. As explained in the <u>Planning Committees</u> section above, when applications are taken to Planning Committee (by whichever of the 5 potential routes), the Ward Member(s) have the opportunity to attend the meeting and speak for on the application (plus answer questions from the Planning Committee).
- 2.58. Between 1 April 2023 and 31 March 2024, only 16 of the 90 items at Planning Committee had a Ward Member speak on them (**Appendix T, Figure 1**). That is just 17.8% of items with a relevant Ward Member using their opportunity to speak to Planning Committee as the Ward Member, or 82.2% without a relevant Ward Member using their opportunity to speak.
- 2.59. As illustrated in **Appendix T, Figures 2 to 7**, the proportion of items on which Ward Members spoke did vary based upon the reason the applications were at Planning Committee with relevant Ward Members speaking on:
 - 14.3% of items that had been called straight to Planning Committee by the Head of Service,
 - 66.7% of items that had been called straight to Planning Committee by the Chair/Vice Chair of Committee,
 - 14.81% of items that were at Planning Committee because ESC were the owners and/or the applicant,

- 0% of items that were at Planning Committee because the agent or applicant was an ESC Elected Member or ESC member of staff or close relative of either,
- 20.6% of items that were referred to Planning Committee by the Planning Referral Panel.

Involvement of Town/Parish Councils

- 2.60. In the East Suffolk Council area, more than 90% have a <u>Public Access</u> accounts set up, which their clerks can use to monitor applications and submit comments. This is an expectation of Town and Parish Councils since notifications/updates on applications (other than formal consultations) are not sent manually and Clerk's/Town or Parish Councillors are expected to monitor notifications regularly.
- 2.61. Those that have a Public Access are notified via email alerts from the Public Access system as a minimum when:
 - An application is validated within their area, and thus available for them
 - to view online and submit comments if they wish,
 - If the address or description is revised during the application process,
 - When the application status is changed, and
 - When the application is determined
- 2.62. A Town/Parish Council is consulted on any planning application (and many other planning related applications) on a site within their town/parish. They can view the documents online via Public Access, and submit comments either through the Public Access system or via email.
- 2.63. The points at which they can interact with the Planning Application Process are illustrated in Appendix B, Figure 2, which shows the formal consultation process through which they can submit written comments, potentially triggering the Planning Referral or Committee Call-in Process and their ability to attend and speak on applications that go the Planning Committee.
- 2.64. As explained in the <u>Planning Referral Panel</u> and <u>Scheme of Delegation</u> sections of this report, if the comments of the Town/Parish Council is contrary to the 'minded to' recommendation of officer, the Planning Referral Panel Process is then triggered, unless the ward member(s) also share the views of the Town/Parish Council, in which case the Committee Call-in Process is triggered.
- 2.65. Between 1 April 2023 and 31 March 2024, 160 applications triggered the Referral Panel Process and 159 or 99.4% of those were at Planning Referral Panel had comments from the relevant Town/Parish Council. This demonstrates that Town/Parish Councils are clearly engaging with the formal consultation process on applications.
- 2.66. When applications are taken to Planning Committee (by whichever of the 5 potential routes), the Town/Parish Council also have the opportunity to attend the meeting and speak for up to 3 minutes (plus answer questions from the Planning Committee).

- 2.67. Between 1 April 2023 and 31 March 2024, 28 of the 90 items at Planning Committee had a Town/Parish Council speak on them. That is 31.1% of items. This is significantly higher than proportion of items on which Ward Members utilised their opportunity to speak (17.8%), but still only a minority of applications.
- 2.68. As illustrated in **Appendix T, Figures 2 to 7**, the proportion of items on which relevant Town/Parish Councils varies based upon the reason the applications were at Planning Committee with relevant Town/Parish Councils speaking on:
 - 47.62% of items that had been called straight to Planning Committee by the Head of Service,
 - 66.67% of items that had been called straight to Planning Committee by the Chair/Vice Chair of Committee,
 - 3.7% of items that were at Planning Committee because ESC were the owners and/or the applicant,
 - 0% of items that were at Planning Committee because the agent or applicant was an ESC Elected Member or ESC member of staff or close relative of either,
 - 44.12% of items that were referred to Planning Committee by the Planning Referral Panel.
- 2.69. Therefore, it is clear that Town and Parish Councils are attending to speak on some items at Planning Committee meetings, particularly those that are called straight in by the Head of Service or Committee Chair/Vice-chair, and those which are referred by the Planning Referral Panel.
- 2.70. However, it would be welcomed if more Town/Parish Councils took the opportunity to speak on a higher proportion of items at Planning Committee. On some trigger reasons their figure is significantly lower compared to that of agents/applicants, as set out in the table below and illustrated in the graphs in **Appendix T, Figures 1 to 7**:

Table 1: The proportion of items on which each speaker spoke at Planning Committee between 1 April 2023 and 31 March 2024

Reason at Committee	Town/Parish Council	Third Party	Agent/Applicant	Ward Member
Part 1 - Straight to committee by HoS or for other reason	47.62%	47.62%	90.48%	14.29%
Part 1 - Called to committee by Chair/Vice-chair	66.67%	0%	0%	66.67%
Part 2 - ESC owner/applicant	3.70%	3.70%	48.15%	14.8%
Part 3 - ESC staff/member connection	0%	0%	40%	0%
Part 4 - Referred by Panel	44.12%	17.65%	73.53%	20.59%

Part 5 - Called in via P Committee call in process	n/a	n/a	n/a	n/a
Overall / All Committee Items	31.11%	18.89%	65.56%	17.78%

- 2.71. It is not clear why this variation in speaking by Town/Parish Councils at Planning Committee is occurring. There doesn't appear to be particular Town or Parish Councils more likely to attend to speak, and there doesn't appear to be any geographical pattern, or link to the scale of the settlement (based upon the information included in **Appendix T, Figure 8**, which shows the number of items at Planning Committee by parish and the number of items the Town/Parish Council spoke at). It could be linked to the nature and scale of the proposals.
- 2.72. By comparing the data in **Appendix S, Figure 6** (the number of items per reason at Planning Committee), with the number of items the Town/Parish Council spoke on set out in **Appendix T, Figure 8**, it appears that some of the towns/parishes with the largest number of items but the Town/Parish only spoke on a small number of items, are locations where the majority of the items were at Planning Committee either because ESC were the applicant/land owner or there was an applicant/agent connection to an ESC elected member or member of staff, so those items weren't necessarily items that the Town/Parish Council had significant views on (e.g. Felixstowe and Lowestoft).
- 2.73. However, there are some Towns/Parishes where a significantly larger number of items were at Planning Committee via the Planning Referral Panel, than the number of items on which the Town/Parish Council spoke at Planning Committee. This suggests that the Town/Parish Council were very likely to have had a contrary view to officers in order to trigger the Referral Panel Process but then they didn't take up the opportunity to speak the Planning Committee meeting (e.g. Walberswick had 6 items at Planning Committee via the Panel, but only spoke on 3 of them).
- 2.74. The referral of applications to the Planning Committee via the Planning Referral Panel provides an opportunity for the relevant Town/Parish Council to speak on the application, and Town/Parish Councils are encouraged to take up that opportunity.
 <u>Involvement of Statutory Consultees</u>
- 2.75. Planning Law sets out the circumstances where Local Planning Authorities have to consult specific bodies prior to an application being made on a planning application. These are referred to as 'Statutory Consultees'. The requirements to consult each organisation is dependent upon the nature and location of the site, any designations and the specifics of the proposal. Therefore, not all statutory consultees have to be consulted on every application. A list of Statutory Consultees has been produced in Government Guidance at Consultation and pre-decision matters GOV.UK (www.gov.uk).
- 2.76. The diagram in **Appendix B, Figure 3,** illustrates the interaction points of Statutory Consultees in the application process.

- 2.77. As explained in the <u>Planning Referral Panel</u> section of this report above, if the comments from a Statutory Consultee are contrary to the 'minded to' recommendation of officers it triggers the Planning Referral Panel Process.
- 2.78. As illustrated in **Appendix O, Figures 1 and 2**, a relatively low proportion of items were at the Planning Referral Panel between 1 April 2023 and 31 March 2024, with views from statutory consultees contrary to the 'Minded-to' recommendations of officers, with just 2 items with contrary comments from the Environment Agency, 1 item with contrary views from SCC as the Lead Local Flood Authority, and 8 from SCC as Local Highway Authority.
- 2.79. In making such recommendations contrary to the views of statutory consultees, officers would have very carefully considered their comments and have had to have clear justification in order to reach a different conclusion.

Involvement of Third Parties

- 2.80. Third Parties are those neighbours who share a boundary with the application site along with any other nearby residents or those living further afield who comment on a Planning Application.
- 2.81. Whilst the comments from such parties can not trigger the Planning Referral Panel Process, any material planning considerations they raise are considered in the determination of the application, and such parties have the opportunity to speak at Planning Committee meetings.
- 2.82. As set out in Table 1 in the <u>Involvement of Town/Parish Councils</u> Section of this report, and in the graphs in **Appendix T, Figures 1 to 7**, some third parties do take up the opportunity to speak at Planning Committee meetings, with third party speaking recorded on 18.89% of all Planning Committee Items.
- 2.83. However, taking up this opportunity does appear to vary significantly depending upon the nature of the trigger reason for the item being at Planning Committee for determination, with Third Party Speaking on 47.62% of items at Planning Committee through direct call in by the Head of Service, but no third party speaking on items at Planning Committee through direct call in by Chair/Vice Chairs or there due to a ESC Elected Member or staff connection, and only on 17.65% of items referred to Planning Committee via the Planning Referral Panel.
- 2.84. It is not known why this variation is occurring. However, having a higher figure for items at Planning Committee through direct call in by the Head of Service is expected as they tend to be case with significant public interest. The lower figures for the other categories may be due to limited interest in some items, even if they are triggered to the Planning Referral and then Planning Committee by the comments of the Town/Parish Council, or it could be that third parties are unaware of their opportunity to speak or when the items are going to be at Planning Committee, despite details of both being provided on the ESC website, and the initial consultation letters directing people to that information.

Outcomes of applications

- 2.85. As shown in **Appendix U, Figure 11**, there was some variation in the proportions of applications that were approved, refused or remained live at the end of the financial year.
- 2.86. The decision route type with the highest proportion of applications subsequently refused was items that had triggered the Planning Referral Panel and then been delegated to officers for determination. Given that most applications triggered to the Planning Referral by the comments of the town or parish council being contrary to the minded to recommendations of officers, this indicates that approximately 20% of the applications at the Planning Referral Panel were there because the town/parish council recommended approval, and approximately 79% were there because they recommended refusal.
- 2.87. The decision types with the least number of refusals were applications called into Planning Committee by the Chair or Vice-Chair, and applications that were at Planning Committee due to a connection to an ESC elected member or ESC member of staff.

Appeal outcomes of applications

- 2.88. As explained in the Planning Performance Report on this agenda, the outcomes of appeals are reported on a quarterly basis to the Strategic Planning Committee and the latest of these is also on this meeting's agenda.
- 2.89. As also explained in that report between 1 April 2023 and 31 March 2024, there were 73 Planning related Appeal Decisions received, with 89% dismissed (i.e. upholding the ESC's decision), 5% allowed (i.e. overturning ESC's decision) and 6% split appeal decisions (Appendix F, Figure 3 to the Performance Report also on this agenda).
- 2.90. Based upon these figures there are no concerns regarding the decisions being made at Planning Committee or at officer level (either triggering or not triggering the Planning Referral Process).

Time Implications of Process

- 2.91. Between 9 June 2023 (after the May elections) and 31 March 2024, the Planning Referral Panel meetings took a total of 36 Hours 5 Minutes. This is a significant number of hours and would have likely been significantly longer if data included the entire financial year. Based upon the average of 57 mins per meeting, and assuming there had been a weekly meeting for each of the 9 weeks of the financial year not covered by the current data, that would have been an additional 8 hours 38 minutes, or a combined total for the year of 44 hours 43 minutes.
- 2.92. In addition to this time in the meetings themselves, significant officer time is required in preparing the reports and PowerPoint slides presented to the Panel. Therefore, it has to be recognised that the Planning Referral Panel Process takes a significant amount of both officer and member time.

- 2.93. Between the 1 April 2023 to 31 March 2024, the North Area Planning Committee Meetings took 24 hours 56 minutes, the South Area Planning Committee meetings took 19 hours 33 minutes, and the Strategic Planning Committee 8 hours 15 minutes. This is a total of 52 hours 44 mins. Although there was a pause in the Planning Committee Meetings due to the elections in May 2023, this is similar to the previous financial year which had more than 50 hours in Planning Committee meetings, including almost 21 hours in North Planning Committee and almost 23 hours in South Planning Committee and over 6 hours in Strategic Planning Committee meetings.
- 2.94. In addition to this time in the meetings themselves, significant officer time is required in preparing the reports, complying and publishing the agenda and preparing PowerPoint slides for presenting to the Planning Committee, and then there is as significant officer time required afterwards for things like the publication of minutes etc. Therefore, it has to be recognised that the Planning Committee Process takes a significant amount of both officer and member time.
- 2.95. Both the Planning Referral Panel, and the Planning Committee Processes, add time to the application determination timeframe, because the need to prepare and publish reports ahead of scheduled meetings etc creates a delay between a minded to recommendation being formed and a formal decision being made on the application.
- 2.96. In many cases, particularly those items that go via the Referral Panel Process and then on to Planning Committee, this can add several weeks, and can often require extensions of time to be agreed with applicants/agents to avoid such applications as been logged as out of time/beyond determination period.
- 2.97. As shown in the graphs/charts in **Appendix V**, particularly **Figure 11**, the determination route with the highest proportion of applications meeting the Government target times are those that are delegated without triggering the Referral Panel Process, and during the last financial year the majority of applications determined via Planning Committee (97%) were issued out of time (74% within an agreed extension of time and 23% beyond the government set targets or any extension of time agreement).
- 2.98. In order to achieve the Government, set targets for the proportions of applications being determined in time (70% for non-majors), based upon the proportions illustrated in **Appendix V, Figure 11**, a significant number of Extensions of Time are having to be agreed.
- 2.99. This is particularly noticeable for cases that are either triggering the Planning Referral Panel and are then delegated back to officers for determination (only 13% in government target, 51% within Extensions of time and 37% out of time), and for cases that are determined at Planning Committee (only 3% within government target, 74% within extensions of time and 23% out of time). These are shown by the third and fourth bars on **Appendix V, Figure 11**.
- 2.100. Whilst the importance of member involvement through the Planning Referral Panel Process and Planning Committee process to the democratic process must be recognised,

- these figures illustrate the impact of the additional time required for applications to follow the Planning Referral Panel and/or Planning Committee Processes.
- 2.101. As outlined in the <u>Involvement of Ward Members</u> and <u>Involvement of Town/Parish Councils</u> sections of this report, the potential value of the existing democratic process is clearly not being fully utilised by those that can directly input into the Planning Referral Panel and Planning Committee Process including the trigger mechanisms for those processes.
- 2.102. Higher levels of Ward Member involvement through the submission of written comments and attendance at Referral Panel meetings, along with higher levels attendance to speak at Planning Committee meetings, along with higher levels of Town/Parish Council involvement by attendance/speaking at Planning Committee, would increase in the level of input to the democratic aspects of the process.
- 2.103. Whilst increased participation into the democratic aspects of these processes is to be encouraged, it must also be recognised that any increase in such activity could increase the number of applications going through the referral panel and committee processes and/or the length of time such applications take, which may affect the ability of the Local Planning Authorities ability to meet the Government set targets.
- 2.104. As explained in the 'Planning Applications' section within the Introduction of the 'Planning Performance Report' which is also on this meetings agenda, the Local Planning Authority is currently monitored quarterly on its ability to meet nationally set timeframes for Major and Non-Major Planning Applications, and those quarterly statistics are monitored in terms of overall proportions during a 2-year period.
- 2.105. As set out in that report, the minimum target for Majors is being exceeded, and those for Non-Majors is also being met in terms of the overall 2-year figure, but was below the 70% for the January to March 2024 period. It is still realistic to expect the overall 2-year figure for non-majors to be above 70% as there are still 2 quarters left in the current monitoring period, but that will require that as many as possible non-major decisions are issued within time or within agreed extensions of time. The easiest process route by which to get decisions in time is when they are delegated and do not trigger the Planning Referral Panel, Committee Member Call-in route or straight call in to Planning Committee, as those routes add weeks to the process of determination. However, this need to meet targets has to balanced with the democratic process and shouldn't be seen as a reason not to trigger any of these processes.

The start time of North and South Planning Committees

2.106. The recommendation of this report also asks the Strategic Planning Committee to discuss the timing of the start of Planning Committee meetings in order to understand the desires of members for the next municipal year and whether any change is desired. To enable the debate, a 9.30am start time for Planning Committee South and Planning Committee North is recommended for approval. However, officers are not committed to this proposal but wish for members to have the opportunity to discuss a proposed change in time.

- 2.107. At present North and South Planning Committees start at 2pm. They usually conclude by 5.30pm. There have been some months recently where due to the number of cases set for committee consideration that month, the agenda would not have concluded within four hours. Therefore, extraordinary committee meetings have been called within those months, creating two area committee meetings for the month. One advantage of starting at 9.30am is that a full day of Planning Committee can be held, accommodating more agenda items in one meeting, rather than two where business dictates this is necessary. However, full day meetings can be exhausting for officers and members and can cause long periods of waiting for public speakers.
- 2.108. The current afternoon meetings are relatively concise and focussed. However, compared with focussed attention officers and members may have in the morning, at times, energy levels may be lower mid-afternoon. It is however recognised that people varying when their energy levels peak in order to focus on the detailed business of Planning Committees.
- 2.109. For some members the afternoon start may be preferable for personal and working commitments. For others a morning session may be preferable and allow a free afternoon. Officers respect that we have a broad range of members with varying commitments over the daytime and evening hours. Occasionally, due to commitments such as childcare, some officers have had to leave the Planning Committee early when the agenda has extended beyond 5pm.
- 2.110. A recommendation to change the start time of meetings to 9.30am is proposed to enable discussion, rather than as an evidenced recommendation. Officers do not wish to create any division over the concept of a change but would like to use this recommendation to gauge opinion of the committee members and if necessary, return with further consideration and proposals at a future meeting. If there was support for a change to this time, or an alternative agreed time, this would need to be included in the calendar of meetings for the 2025/26 municipal year, to be agreed by Full Council in early 2025.

3. Proposal

3.1. These figures and processes should continue to be monitored on an annual basis.

4. Financial Implications

- 4.1. As explained in the <u>previous Planning Performance Report to Strategic Planning Committee in January 2024</u>, the planning application fees were increased on 6 December 2023 through <u>The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023 (legislation.gov.uk) and those regulations also amended Town and Country Planning Development Management Procedure Order 2015 (as amended), to introduce a 16 week planning guarantee.</u>
- 4.2. This means where a planning application takes longer that the statutory time periods (i.e. 13 weeks for Major and 8 Weeks for Non-Major) and an extension of time has not been agreed with the applicant, the Planning Guarantee applies.

- 4.3. This means that if a Major application is not decided within 26 weeks or a Non-Major within 16 weeks, and where no extension of time has been agreed, or appeal against non-determination been submitted, then the fee paid by the applicant will be refunded to them.
- 4.4. Therefore, the Local Planning Authority needs to ensure to ensure that planning applications are determined within the set timescales or agree extensions of time in order to minimise the potential risk for fees to be refunded on such applications.
- 4.5. However, it should be noted that applications can potentially be refused if the applicants are deliberately trying to delay the determination or refuse to agree an extension of time in order to seek to secure a refund. National Planning Policy Guidance is clear that applicants should not attempt to delay a decision on their application simply to obtain a fee refund and that a Local Planning Authority will be justified in refusing permission when an applicant causes deliberate delay and has been unwilling to agree an extension of time Determining a planning application GOV.UK (www.gov.uk).

5. Legal Implications

- 5.1. If a planning application is not determined within the eight- or 13-week target time, or within an agreed extension of time, then the applicants have a right to appeal to the Planning Inspectorate, who would then be the determining authority for that planning application.
- 5.2. However, it should be noted that planning applications do not obtain deemed consent if they are not determined in time. The eight- and 13-week time frames for determination are important for ensuring that the not only the decision on each application remains with the Local Planning Authority, but ensuring that the government targets are met for the two-year monitoring period process, so that wider determination powers remain with the Local Planning Authority.
- 5.3. Prior Notification applications which do not form part of this two-year monitoring period process, because they are not Planning Applications, also need to be determined within time, because if the proposals meet the criteria to be Permitted Development subject to the Prior Notification Process (as set out in The Town and Country Planning (General Permitted Development) (England) Order 2015 (legislation.gov.uk)), are not determined within the set timescale or an agreed extension of time, they can obtain deemed consent, which means works can go ahead outside the control of the Local Planning Authority.

6. Risk Implications

6.1. As outlined in the accompanying Planning Performance Report on the agenda for this meeting, there are nationally set targets for Major Planning Applications (13 weeks) and Non-Major Planning Applications (8 weeks) to be determined within, and East Suffolk Council as Local Planning Authority has to submit quarterly returns to central Government relating to the percentage of Planning Applications it determines within these timescale or agreed extension of time, with a requirement for 60% of Major

Decisions and 70% of Non-Major Decisions to be determined within 8/13 weeks or agreed extensions of time, in order to avoid the possibility of being placed in special measures.

- 6.2. As outlined in the <u>Time Implications of Process</u> section of this report, both the Planning Referral Panel Process and the Planning Committee Process can add significantly to the time taken to determine Planning Applications.
- 6.3. Therefore, any increase in the number of Planning Applications required to follow either or both processes has the potential to increase the number of Planning Applications being determined after 8/13week nationally set target dates, which in turn makes it more difficult for the Local Planning Authority to meet the targets for the proportion of Planning Applications determined in time (which if not met for the monitoring period can result in a Local Planning Authority being placed in special measures and loosing its ability to determine such applications).
- 6.4. As these processes add time to the determination process of Planning Applications and therefore as illustrated by **Appendix V**, **Figure 11**, and reduce the proportion of planning applications determined within the 8/13 weeks, they also increase the risk of appeals against non-determination. Applicants have a right of appeal against non-determination if their application is not determined within the target date and no extension of time has been agreed. In such circumstances, the power to determine the application is lost by East Suffolk Council and passes to the Planning Inspectorate.
- 6.5. There is also a risk in terms of costs to the local authority, because if applications go beyond the 8/13 weeks, with no agreed extension of time, and it becomes 16 weeks old since validation, applicants are entitled to a refund.
- 6.6. The current proportions of applications triggering the Planning Referral Panel Process and/or Planning Committee Process appear to be appropriate, because although they are affecting the Local Planning Authorities ability to meet the 8/13week target date on applications that pass through those processes, overall, over a 2-year monitoring period, the negative impact can be absorbed by the proportion of delegated decisions being determined in time.
- 6.7. However, any increase in the proportion of applications triggering either process would increase the risk of the Local Planning Authority struggling to meet the nationally set targets, having appeals against non-determination and having to refund application fees.
- 6.8. Therefore, in order to manage this risk it is recommended that the Planning Referral Panel and Planning Committee processes continue to be monitored through these annual reports.

7. Options

7.1. There are not any options other than to continue to monitor the processes through these annual reports and seek to address any potential issues if or as and when they arise.

8. Recommendations

- 8.1. That Strategic Planning Committee notes this report regarding the performance of the Development Management Team in terms of the speed of determining planning applications.
- 8.2. That Strategic Planning Committee recommends to Full Council that when considering the calendar of meetings for Municipal Year 2025/26, the start time for Planning Committee North and Planning Committee South be moved from 14:00 to 09:30.

9. Reasons for Recommendations

- 9.1. That the contents of the report are noted and that no changes are made to the Referral Panel Process.
- 9.2. In respect of the Planning Committee North and Planning Committee South start time recommendation, in order to appraise the opinion of the Strategic Planning Committee on this proposed change.

10. Conclusions/Next Steps

- 10.1. Strategic Planning Committee should continue to receive these annual monitoring reports.
- 10.2. Subject to the outcome of the Committee start time recommendation, to implement any agreed change from 1st April 2025.

Areas of consideration comments

Section 151 Officer comments:

The Section 151 Officer has received a copy of the report and has no further comments'

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Safeguarding:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Crime and Disorder:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Planning Committee meetings require a clerk from the Democratic Services Team, and therefore any increase in the number of Planning Applications at Planning Committee would increase the time they are required to publish the reports, spend in meetings and to type up the minutes etc.

Residents and Businesses consultation/consideration:

Not applicable to the statistics presented in this report

Appendice	s:
Appendix A	The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution
Appendix B	The key formal interaction points during the Planning Application Process
Appendix C	The Planning Referral Panel Protocol
Appendix D	The notifications sent to Ward Members of upcoming Planning Referral Panel Meetings and to Planning Committee Members of the Call-in process.
Appendix E	The numbers, proportions and scale of applications at the Planning Referral Panel
Appendix F	The numbers of items per meeting for each ward at each of the Referral Panel meetings between 1 April 2023 and 31 March 2024
Appendix G	The numbers and proportions of Planning Applications at the Planning Referral Panel, shown by ward
Appendix H	The numbers and proportions of Planning Applications at the Planning Referral Panel, shown by Town/Parish
Appendix I	The number and proportion of items at the Planning Referral Panel with/without comments from relevant Ward Members, shown by Town/Parish for the period 1 April 2022 – 31 March 2023

Appendix J	The number and proportion of items at each Planning Referral Panel meeting with or without comments from the relevant Ward Members for
	the period 1 April 2022 – 31 March 2023
Appendix K	The number and proportion of items at the Planning Referral Panel with/without comments from relevant Town/ Parish Council, shown by
	Ward for the period 1 April 2023 – 31 March 2024
Appendix L	The number and proportion of items at the Planning Referral Panel
' '	with/without comments from relevant Town/ Parish Council, shown by
	Town/Parish for the period 1 April 2023 – 31 March 2024
Appendix M	The number and proportion of items at each Planning Referral Panel
, ipponantin	meeting with or without comments from the relevant Town/Parish
	Council for the period 1 April 2023 – 31 March 2024
Appondix N	A comparison of Town/Parish Council responses and Ward Members
Appendix N	
- " -	comments on applications at the Planning Referral Panel
Appendix O	The number and proportion of items at Planning Referral Panel meetings
	with or without comments from the Statutory Consultees for the period 1
	April 2023 – 31 March 2024
Appendix P	Attendance by relevant Ward Member(s) at Planning Referral Panel
	Meetings between May 2023 and 31 March 2024.(Since May 23
	elections)
Appendix Q	The Planning Committee Procedures as set out in the East Suffolk Council
	Constitution
Appendix R	The number and scale of Planning Applications at Planning Committee
''	between 1 April 2023 and 31 March 2024
Appendix S	The reasons items were at Planning Committee between 1 April 2023 and
	31 March 2024
Appendix T	Attendance / Public Speaking at Planning Committee
Appendix U	The outcomes of Planning Applications between 1 April 2023 and 31
, ippendix o	March 2024
Appendix V	The timeliness of decisions, based upon determination route
Thheliniy A	The timeliness of decisions, based apon determination route

Background reference papers:				
Date	Туре	Available From		
8 July 2024	Annual Planning Performance Report –	CMIS > Meetings		
	1 April 2023 to 31 March 2024			
3 July 2023	Review of the North, South and	CMIS > Meetings		
	Strategic Planning Committees and the			
	work of the Referral Panel 2022 -2023			
6 June 2022	Review of the North, South and	CMIS > Meetings		
	Strategic Planning Committees and the			
	work of the Referral Panel 2021 -2022			
7 June 2021	Annual Review of the Planning Referral	CMIS > Meetings		
	Panel Procedure and Processes			
4 June 2020	Review of the Planning Application	CMIS > Meetings		
	Referral Panel Process to determine			
	with applications are considered by the			
	relevant Planning Committee			

Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023 -2024

Contents

Appendix A: The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution		
Figure 1: The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution	14	
Figure 2: An illustration of the 5 triggers and routes by which Planning Applications can reach Planning Committee for determination	17	
Appendix B: The key formal interaction points during the Planning Application Process	18	
Figure 1: A diagram of the application process with the key formal interaction points of Ward Member(s)	19	
Figure 2: A diagram of the application process with the key formal interaction points of Town and Parish Councils	20	
Figure 3: A diagram of the application process with the key formal interaction points of Statutory Consultees	21	
Figure 4: A diagram of the application process with the key formal interaction points of Third Parties and non-statutory consultees	22	
Appendix C: The Planning Referral Panel Protocol	23	
Figure 1: The Planning Referral Panel Protocol	24	
Appendix D: The notifications sent to Ward Members of upcoming Planning Referral Panel Meetings and to Planning Committee Members of		
process.	27	
Figure 1: A screenshot of the "Notification of Upcoming Planning Referral Panel Meetings" Teams chat, showing the type of notification all w members receive every week		
Figure 2: A copy of the template for emails notifying/consulting Planning Committee members of the call-in process (trigger 5 in the constitu	ıtion) 29	

A	ppendix E: The numbers, proportions and scale of applications at the Planning Referral Panel	30
	Figure 1: The Proportion of Referral Panel Items in the North/South Planning Committee Areas between 1 April 2023 and 31 March 2024, and the proportion of Referral Items in the North/Central/South Team areas from 11 September 2023 to 31 March 2023	31
	Figure 2: The number of Majors, Minors and Others at Referral Panel between 1 April 2023 and 31 March 2024	32
	Figure 3: The percentage of items that were Majors, Minors and Others at Referral Panel between 1 April 2023 and 31 March 2024	33
	Figure 4: The Percentage of Majors, Minors and Others within the North Area at Referral Panel between 1 April 2023 and 31 March 2024	. 34
	Figure 5: The Percentage of Majors, Minors and Others within the South Area at Referral Panel between 1 April 2023 and 31 March 2024	35
	Figure 6: The Number of Majors, Minors and Others within Planning Committee North Area at Referral Panel between 1 April 2023 and 31 March 2024	1 36
	Figure 7: The Number of Majors, Minors and Others within Planning Committee South Area at Referral Panel between 1 April 2023 and 31 March 2024	1 37
	Figure 8: The Number of Majors, Minors and Others at each meeting of the Referral Panel between 1 April 2023 and 31 March 2024	38
	Figure 9: The Proportion of Majors, Minors and Others at each meeting of the Referral Panel between 1 April 2023 and 31 March 2024	39
	Figure 10: The total number of items at the Planning Referral Panel per year, since the Panel was introduced	40
	Figure 11: The Number/Proportion of items at the Planning Referral Panel that the Panel referred to Planning Committee or delegated to Officers per year since the Planning Referral Panel was introduced.	
	Figure 12: The split of votes on items at the Referral Panel between May 2023 and 31 March 2024	42
	Figure 13: The outcomes of items that were an even vote by the Referral Panel, so referral/delegation decided by the Head of Service	. 43
Α	ppendix F: The numbers of items per meeting for each ward at each of the Referral Panel meetings between 1 April 2023 and 31 March 2024	44
	Figure 1: The number of items per Planning Referral Panel Meeting between 1 April 2023 and 31 March 2024	45
	Figure 2: The Proportion of items from each Ward at each meeting between 1 April 2023 and 31 March 2024 (actual numbers shown by ward in Figure 3-31)	
	Figure 3: The number of items from Aldeburgh and Leiston Ward at each meeting between 1 April 2023 and 31 March 2024	47

Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024

Figure 4: The number of items from Beccles and Worlingham Ward at each meeting between 1 April 2023 and 31 March 2024	47
Figure 5: The number of items from Bungay and Wainford Ward at each meeting between 1 April 2023 and 31 March 2024	47
Figure 6: The number of items from Carlford and Fynn Valley Ward at each meeting between 1 April 2023 and 31 March 2024	48
Figure 7: The number of items from Carlton and Whitton Ward at each meeting between 1 April 2023 and 31 March 2024	48
Figure 8: The number of items from Carlton Colville Ward at each meeting between 1 April 2023 and 31 March 2024	48
Figure 9: The number of items from Deben Ward at each meeting between 1 April 2023 and 31 March 2024	49
Figure 10: The number of items from Eastern Felixstowe Ward at each meeting between 1 April 2023 and 31 March 2024	49
Figure 11: The number of items from Framlingham Ward at each meeting between 1 April 2023 and 31 March 2024	49
Figure 12: The number of items from Gunton & St Margarets Ward at each meeting between 1 April 2023 and 31 March 2024	50
Figure 13: The number of items from Halesworth & Blything Ward at each meeting between 1 April 2023 and 31 March 2024	50
Figure 14: The number of items from Harbour and Normanston Ward at each meeting between 1 April 2023 and 31 March 2024	50
Figure 15: The number of items from Kelsale and Yoxford Ward at each meeting between 1 April 2023 and 31 March 2024	51
Figure 16: The number of items from Kesgrave Ward at each meeting between 1 April 2023 and 31 March 2024	51
Figure 17: The number of items from Kessingland Ward at each meeting between 1 April 2023 and 31 March 2024	51
Figure 18: The number of items from Kirkley and Pakefield Ward at each meeting between 1 April 2023 and 31 March 2024	52
Figure 19: The number of items from Lothingland Ward at each meeting between 1 April 2023 and 31 March 2024	52
Figure 20: The number of items from Martlesham & Purdis Farm Ward at each meeting between 1 April 2023 and 31 March 2024	52
Figure 21: The number of items from Melton Ward at each meeting between 1 April 2023 and 31 March 2024	53
Figure 22: The number of items from Orwell & Villages Ward at each meeting between 1 April 2023 and 31 March 2024	53
Figure 23: The number of items from Oulton Broad Ward at each meeting between 1 April 2023 and 31 March 2024	53
Figure 24: The number of items from Rendlesham and Orford Ward at each meeting between 1 April 2023 and 31 March 2024	54
Figure 25: The number of items from Rushmere St Andrew Ward at each meeting between 1 April 2023 and 31 March 2024	54
Figure 26: The number of items from Saxmundham Ward at each meeting between 1 April 2023 and 31 March 2024	54

Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024

Figure 27: The number of items from Southwold Ward at each meeting between 1 April 2023 and 31 March 2024	55
Figure 28: The number of items from Western Felixstowe Ward at each meeting between 1 April 2023 and 31 March 2024	55
Figure 29: The number of items from Wickham Market Ward at each meeting between 1 April 2023 and 31 March 2024	55
Figure 30: The number of items from Woodbridge Ward at each meeting between 1 April 2023 and 31 March 2024	56
Figure 31: The number of items from Wrentham, Wangford and Westleton Ward at each meeting between 1 April 2023 and 31 March 2024	56
Appendix G: The numbers and proportions of Planning Applications at the Planning Referral Panel, shown by ward	57
Figure 1: Number of items at Referral Panel (by Ward) between 1 April 2023 and 31 March 2024	58
Figure 2: Number of Planning Applications in each ward that could trigger the referral process, between 1 April 2023 and 31 March 2024	59
Figure 3: Number of Planning Applications that have triggered the Referral Panel/could have triggered the referral panel process (shown by ward alphabetical order) between 1 April 2023 and 31 March 2024	
Figure 4: Percentage of Planning Applications that have triggered the Referral Panel (by ward in alphabetical order) between 1 April 2023 and 31 March 2024	
Appendix H: The numbers and proportions of Planning Applications at the Planning Referral Panel, shown by Town/Parish	62
Figure 1: The number of items at the Referral Panel shown by Town/Parish between 1 April 2023 and 31 March 2024	63
Figure 2: The Number of Planning Applications going through/not going through the Planning Referral Panel Process between 1 April 2023 and 31 2024, shown by Town/Parish	
Figure 3: The Proportion of Planning Applications going through/not going through the Planning Referral Panel Process between 1 April 2023 and March 2024, shown by Town/Parish	
Appendix I: The number and proportion of items at the Planning Referral Panel with/without comments from relevant Ward Members, shown by Parish for the period 1 April 2022 – 31 March 2023	

4 | Page

Figure 1: The number of items at Planning Referral Panel with Objections from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Figure 2: The number of items at Planning Referral Panel with No Objections/Neutral comments from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Figure 3: The number of items at Planning Referral Panel with Support from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Figure 4: The number of items at Planning Referral Panel with no written comments from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Figure 5: The proportion of items at Planning Referral Panel with or without written comments from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Appendix J: The number and proportion of items at each Planning Referral Panel meeting with or without comments from the relevant Ward Members for the period 1 April 2022 – 31 March 2023
Figure 1: The number of items at each meeting with Objections from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024
Figure 2: The number of items at each meeting with no Objections/Neutral comments from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024
Figure 3: The number of items at each meeting with Support from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024 74
Figure 4: The number of items at each meeting with any form of written comments from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024
Figure 5: The number of items at each meeting with no written comments from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024
Figure 6: The number of items at Planning Referral Panel with and without any written comments from relevant Ward Member(s) shown by Ward for the period 1 April 2023 – 31 March 2024
Figure 7: The proportion of items at Planning Referral Panel with and without any written comments from relevant Ward Member(s) shown by Ward for the period 1 April 2023 – 31 March 2024
Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024 5 P a g e

Figure 8: The proportion of items at Planning Referral Panel with/without any written comments from relevant Ward Member(s) for each year since the Panel was introduced
Appendix K: The number and proportion of items at the Planning Referral Panel with/without comments from relevant Town/ Parish Council, shown by Ward for the period 1 April 2023 – 31 March 2024
Figure 1: The number of items at Planning Referral Panel with Objections from relevant Town/Parish Council shown by Ward for the period 1 April 2023 - 31 March 2024
Figure 2: The number of items at Planning Referral Panel with No Objections/neutral comments from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024
Figure 3: The number of items at Planning Referral Panel with Support from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 3 March 2024
Figure 4: The number of items at Planning Referral Panel with written comments of any type from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024
Figure 5: The number of items at Planning Referral Panel without any written comments of any type from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024
Figure 6: The number of items at Planning Referral Panel with and without any written comments from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024
Figure 7: The proportion of items at Planning Referral Panel with and without any written comments from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024
Appendix L: The number and proportion of items at the Planning Referral Panel with/without comments from relevant Town/ Parish Council, shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Figure 1: The number of items at Planning Referral Panel with Objections from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Figure 2: The number of items at Planning Referral Panel with No Objections/neutral comments from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024
Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024 6 Page

· ·	g Referral Panel with Support from relevant Town/Parish Council shown by Town/Parish for the period 1 Ap	
	g Referral Panel with written comments of any type from relevant Town/Parish Council shown by Town/Par	
	g Referral Panel without any written comments of any type from relevant Town/Parish Council shown by - 31 March 2024	92
	g Referral Panel with and without any written comments from relevant Town/Parish Council shown by - 31 March 2024	93
	ning Referral Panel with and without any written comments from relevant Town/Parish Council shown by – 31 March 2024	94
	of items at each Planning Referral Panel meeting with or without comments from the relevant Town/Pari arch 2024	
Council for the period 1 April 2023 – 31 Ma Figure 1: The number of items at each me		95 arch
Figure 2: The number of items at each me	eeting with Objections from relevant Town/Parish Council, for the period for the period 1 April 2023 – 31 M	95 arch 96 od 1
Figure 2: The number of items at each me April 2023 – 31 March 2024 Figure 3: The number of items at each me April 2023 – 31 March 2024	eeting with Objections from relevant Town/Parish Council, for the period for the period 1 April 2023 – 31 M eeting with no Objections/Neutral comments from relevant Town/Parish Council, for the period for the peri	95 arch 96 od 1 97
Figure 3: The number of items at each me April 2023 – 31 March 2024	eeting with Objections from relevant Town/Parish Council, for the period for the period 1 April 2023 – 31 M eeting with no Objections/Neutral comments from relevant Town/Parish Council, for the period for the period eeting with Support from relevant Town/Parish Council, for the period 1 April 2023 – 31 Marc	95 arch 96 od 1 97 ch 98

Appendix N: A comparison of Town/Parish Council responses and Ward Members comments on applications at the Planning Referral Panel 102
Figure 1: Pie Chart showing the proportion of each type of written comment (or no written comment) received from relevant Ward Member(s) on items at the Planning Referral Panel for the period 1 April 2023 – 31 March 2024
Figure 3: Number of applications at the Planning Referral Panel with any comments from the Town/Parish Council and number with any comments from relevant Ward Member(s) for the period 1 April 2023 – 31 March 2024, shown by Ward
Figure 4: Number of applications at the Planning Referral Panel with Objection from the Town/Parish Council and Objections from relevant Ward Members for the period 1 April 2023 – 31 March 2024, shown by Parish
Figure 5: Number of applications at the Planning Referral Panel with Objection from the Town/Parish Council and no written comments from relevant Ward Members for the period 1 April 2023 – 31 March 2024, shown by Parish
Appendix O: The number and proportion of items at Planning Referral Panel meetings with or without comments from the Statutory Consultees for the period 1 April 2023 – 31 March 2024
Figure 1: Number of items at the panel with comments received from each of the main statutory consultees and the numbers triggering the Planning Referral Process
Figure 2: Proportion of Items at Referral Panel with comments the main Statutory Consultees where they triggered or did not trigger the Referral Panel Process
Appendix P: Attendance by relevant Ward Member(s) at Planning Referral Panel Meetings between May 2023 and 31 March 2024.(Since May 23 elections)
attended .(Since May 23 elections)
Figure 2: Pie Chart showing the percentage of ward members who attended at least one Planning Referral Panel meeting or did not attend any Planning Referral Panels between 9 June 2023 and 31 March 2024. (Since May 23 elections)111
Figure 3: Number of Planning Referral meetings each Ward Member attended between May 2023 and 31 March 2024. (Since May 23 elections) 112
Figure 4: Percentage of Planning Referral Panel Meetings attended by each member between May 2023 and 31 March 2024 (Since May 23 elections). 113

| Page

Figure 5: Number of times where the relevant ward member(s) were present for an item in their ward (Since May 23 elections)	114
Figure 6: Proportion of meetings attended by each Ward Member where there was an item in their Ward (Since May 23 elections)	115
Figure 7: The Number of Items per Referral Panel meeting where the relevant ward member(s) were present at the meeting, shown by meeting (S May 23 elections)	
Figure 8: The Number of members at each meeting (Since May 23 elections)	
Figure 9: The Number/Proportion of Ward Members who have attended at least 1 Referral Panel Meeting during each year since the Referral Panel introduced (i.e. Since April 2019)	el was
Figure 10: Number of Ward Members who have attended a meeting where there was an item in their ward, and there had/hadn't been written comments submitted by a relevant ward Member (Since May 23 elections)	119
Figure 11: The number of times each member has attended a Referral Panel Meeting where they/other members of their ward had or hadn't subravitten comments on the application (Since May 23 elections)	
Appendix Q: The Planning Committee Procedures as set out in the East Suffolk Council Constitution	121
Figure 1: Overview of Committee Procedures as published in the East Suffolk Council Constitution	122
Figure 2: Illustration of how 'Planning Applications' can reach Planning Committee at East Suffolk Council	125
Appendix R: The number and scale of Planning Applications at Planning Committee between 1 April 2023 and 31 March 2024	128
Figure 1: The number of items at Planning Committee each Month between 1 April 2023 and 31 March 2024	129
Figure 2: Number of items at Planning Committee each Month that were Major, Minor and Other, between 1 April 2023 and 31 March 2024	130
Figure 3: Proportion of items at Planning Committee each Month that were Major, Minor and Other, between 1 April 2023 and 31 March 2024	131
Figure 4: Number of items at Planning Committee that were Major, Minor and Other, between 1 April 2023 and 31 March 2024, shown by Ward	132
Appendix S: The reasons items were at Planning Committee between 1 April 2023 and 31 March 2024	133
Figure 1: Pie chart showing the proportion of items at Planning Committee for each reason between 1 April 2023 and 31 March 2024	134
Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024 9 P a g e	

Figure 2: The reasons items were at Planning Committee (i.e. because of an ESC connection, Referral by the Planning Referral Panel or called in by the Committee Chair/Vice Chair or Head of Service) each month between 1 April 2023 and 31 March 2024, shown by number of items
Figure 3: The reasons items were at Planning Committee (i.e. because of an ESC connection, Referral by the Planning Referral Panel or called in by the Committee Chair/Vice Chair or Head of Service) each month between 1 April 2023 and 31 March 2024, shown as proportions
Figure 4: The proportion of items at Planning committee by North/South Committee Area for each reason between 1 April 2023 and 31 March 2024 137
Figure 5: The number of items at Planning committee by Ward with the reasons they were at Planning Committee between 1 April 2023 and 31 March 2024
Figure 6: The number of items at Planning committee by Parish with the reasons they could be at Planning Committee for the period between 1 April 2023 and 31 March 2024
Appendix T: Attendance / Public Speaking at Planning Committee
Figure 1: Percentage of Planning Committee items, on which a potential speaker spoke between 1 April 2023 and 31 March 2024
Figure 2: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they had been called straight to Planning Committee by the Head of Service between 1 April 2023 and 31 March 2024
Figure 3: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they had been called straight to Planning Committee by the Chairs/Vice Chairs of Planning Committee between 1 April 2023 and 31 March 2024
Figure 4: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because ESC were the owners of the land and/or the applicant on the application between 1 April 2023 and 31 March 2024
Figure 5: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because there was an ESC Elected Member or member of staff connection between 1 April 2023 and 31 March 2024
Figure 6: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they had been referred to Planning Committee by the Planning Referral Panel between 1 April 2023 and 31 March 2024
Figure 7: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they reached planning committed via the Planning Committee Call-in process between 1 April 2023 and 31 March 2024
Figure 8: The number of items at Planning Committee by Parish and the number of items on which the Town/Parish Council attended to speak between 1 April 2023 and 31 March 2024
Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024 10 P a g e

Appendix U: The outcomes of Planning Applications between 1 April 2023 and 31 March 2024	151
Figure 1: A pie chart showing the proportions of all 'Planning Applications' that were Refused or Approved, between 1 April 2023 and 31 March determination routes)	
Figure 3: A Pie chart showing the proportion of Planning Applications that were Refused or Approved, following being delegated by the Planning Panel back to officers, between 1 April 2023 and 31 March 2024	_
Figure 4: Pie Chart showing the proportion of all Planning Applications that were resolved to be Refused or Approved, by Planning Committee, April 2023 and 31 March 2024.	
Figure 5: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, be April 2023 and 31 March 2024, that were called straight to Planning Committee by the Head of Service	
Figure 6: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, be April 2023 and 31 March 2024, that were called straight to Planning Committee by the Chair or Vice-Chair of Planning Committee	
Figure 7: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, be April 2023 and 31 March 2024, that were at Planning Committee due to East Suffolk Council being either the applicant and/or land owner	
Figure 8: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, be April 2023 and 31 March 2024, that were at Planning Committee due to the applicant and/or agent being an ESC Elected Member or ESC member or close relative of either	ber of staff
Figure 9: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, be April 2023 and 31 March 2024, that were at Planning Committee due to being referred by the Planning Referral Panel	
Figure 10: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, be April 2023 and 31 March 2024, that were at Planning Committee via the Planning Committee Call in Process	
Figure 11: Comparison between the different determination process routes and the outcomes of the applications.	162
Appendix V: The timeliness of decisions, based upon determination route	163
Figure 1: The timeliness of all 'Planning Applications' determined at officer level (including those that were delegated by the Planning Referral April 2023 – 31 March 2024)	

11 | Page

Figure 2: The timeliness of 'Planning Applications' determined at officer level, without triggering the Planning Referral Panel. (1 April 2023 – 31 March 2024)
Figure 3: The timeliness of 'Planning Applications' determined at officer level, which triggered the Planning Referral Process and were then delegated back to officers for determination. (1 April 2023 – 31 March 2024)
Figure 4: The timeliness of all 'Planning Applications' determined at Planning Committee (no matter their route to committee) (1 April 2023 – 31 March 2024)
Figure 5: The timeliness of 'Planning Applications' determined at Planning Committee due to being called straight to Committee by the Head of Service (1 April 2023 – 31 March 2024)
Figure 6: The timeliness of 'Planning Applications' determined at Planning Committee due to being called straight to Committee by the Chair/Vice-Chair of Planning Committee (1 April 2023 – 31 March 2024)
Figure 7: The timeliness of 'Planning Applications' determined at Planning Committee due to East Suffolk Council being either the applicant and/or land owner (1 April 2023 – 31 March 2024)
Figure 8: The timeliness of 'Planning Applications' determined at Planning Committee due to the applicant and/or agent being an ESC Elected Member or ESC member of staff or close relative of either (1 April 2023 – 31 March 2024)
Figure 9: The timeliness of 'Planning Applications' determined at Planning Committee due to being referred by the Planning Referral Panel (1 April 2023 - 31 March 2024)
Figure 10: The timeliness of 'Planning Applications' determined at Planning Committee via the Planning Committee Call in Process (1 April 2023 – 31 March 2024)
Figure 11: The timeliness of 'Planning Applications' shown based upon determination route (1 April 2023 – 31 March 2024)



Appendix A: The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution

Appendix A: The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution

Figure 1: The Scheme of Delegation for Planning as set out in the Fast Suffolk Council Constitution

East Suffolk Council Constitution - Part B

Section E - APPENDIX 1

REGISTER OF SPECIFIC OFFICER FUNCTIONS

Head of Planning and Coastal Management

All planning application decisions including decisions concerning Environmental Impact Assessment (EIA) decisions or considerations requiring Habitat Impact Assessments (HRA) are delegated to the Head of Planning and Coastal Management UNLESS:

- The Planning Application is, in the opinion of the Head of Planning and Coastal Management or the Chairman/Vice Chairman of the Planning Committee, of significant public interest; would have a significant impact on the environment; or should otherwise be referred to Members due to its significance in some other respect and this request has been made prior to an application being placed on the Agenda for a Referral Panel; or
- 2. The applicant or landowner is East Suffolk Council; or
- The applicant, or agent, is an East Suffolk Councillor or an East Suffolk Councillemployee, or the applicant, or agent, is a close relative of an East Suffolk Councillor or East Suffolk Council employee; or
- 4. The 'minded to' decision of the Planning Officer is contrary to either:
 - The comments received from the Town or Parish Council within the 21-day consultation period; or
 - The comments received from the Ward Member within the 21-day consultation period; or
 - The comments received from a statutory consultee within the 21-day consultation period.

In which case, if item 4 is invoked, the Planning Application will be referred to the Planning Referral Panel – the panel will discuss with the Head of Planning and Coastal Management (based on planning grounds) to either refer the application to Planning Committee for decision or remain delegated to the Head of Planning and Coastal Management: or

5. Within the 21-day consultation period [on a planning application] if a contrary position to the officer recommendation is received from the Town or Parish Council and a request for Committee decision is received from a Ward Member, then a Planning Committee member call-in process would be triggered. In the event that only a Town/Parish Council response or Ward Member response is received then the existing Referral Panel process would proceed.

With the Planning Committee member call-in process triggered, the Planning case officer would send a notification to all relevant North or South Planning Committee members by email.

This would be carried out once the officer is able to understand whether a decision will be contrary to Town or Parish Council and Ward Member positions.

The Notification shall include:

Part 2 - Functions and Responsibilities

Page 56

Appendix A: The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution

East Suffolk Council Constitution - Part B

- · The case reference number, the description of development and the address
- · A link to Public Access to view the application and documents
- A copy of Town or Parish Council response
- · A copy of the Ward Member response
- · A sentence setting out the likely officer recommendation

After the notification has been sent, any member of the relevant North or South Planning Committee must respond within 5 working days if they wish to confirm that it should be considered by the Planning Committee. Any Planning Committee member calling the application in must 'reply to all' (including all members of the relevant Planning Committee) and the first response received will be taken as the call-in request.

A call-in request from a Planning Committee member must set out how they consider it meets the expectation that:

"The proposal would be of significant public interest; would have a significant impact on the environment; or should otherwise be referred to Members due to its significance in some other respect".

The above process could not be utilised where:

- a) the Head of Planning and Coastal Management or the Chair/Vice Chair of the Planning Committee, has already made the decision that in their opinion the application should be determined at Planning Committee because "The proposal would be of significant public interest; would have a significant impact on the environment; or should otherwise be referred to Members due to its significance in some other respect" (point 1 of the current scheme of delegation); or
- b) either the applicant or landowner is East Suffolk Council, or the applicant or agent is an East Suffolk Council employee: or the applicant, or agent, is a close relative of an East Suffolk Councillor or East Suffolk employee, (points 2 and 3 of the current scheme of delegation) because such applications have to be determined by Planning Committee in any case.

Planning Referral Panel

The Planning Referral Panel is a consultative panel consisting of the Chairman and Vice Chairman of each area Planning Committee, convened by the Head of Planning and Coastal Management as necessary and established to advise on the delegated route of decision making for planning permission and other planning matters as part of the scheme of delegation.

Officers will use the Planning Referral Panel to consult with the Chairman and Vice Chairman of the committees as to whether the application or matter will be determined by the relevant Planning Committee or remain delegated to the Head of Planning and Coastal Management in accordance with the Scheme of Delegation. The final decision on whether the relevant Planning Committee or the Head of Planning and Coastal Management shall determine the application or matter shall be made by the Head of Planning and Coastal Management as part of the consultation with the Planning Referral Panel.

Part 2 - Functions and Responsibilities

Page 57

Appendix A: The Scheme of Delegation for Planning as set out in the East Suffolk Council Constitution

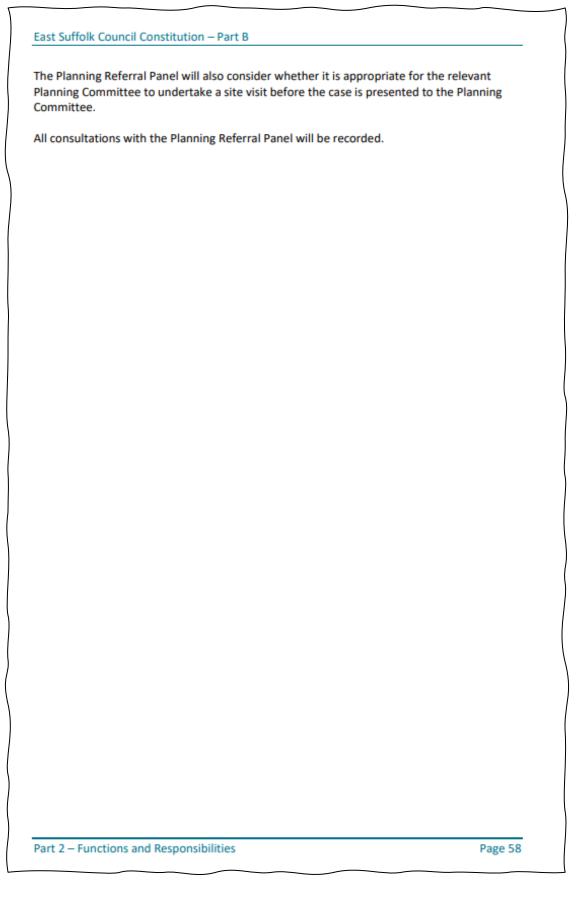


Figure 2: An illustration of the 5 triggers and routes by which Planning Applications can reach Planning Committee for determination.

How 'Planning Applications' reach Planning Committee at East Suffolk Council, as of 24 January 2024 Triggers as set out in Constitution » East Suffolk Council 1. The Planning Application is, in the opinion of the Head of Planning and Coastal Management or the Chairman/ Vice Chairman of the Planning Committee, of significant public interest; would have a significant impact on the Triggers referral to Planning committee environment; or should otherwise be referred to Mem-Planning Committee for determination bers due to its significance in some other respect and this request has been made prior to an application being placed on the Agenda for a Referral Panel; **Referral Panel** The applicant or landowner is East Suffolk Council; Triggers referral to Planning committee referred application 3. The applicant, or agent, is an East Suffolk Councillor or Planning Referral Panel Meeting Triggers referral to Planning committee an East Suffolk Council employee, or the applicant, or agent, is a close relative of an East Suffolk Councillor or East Suffolk Council employee Referral Panel delegated 4. The 'minded to' decision of the Planning Officer is contrary to either: application Scheduled for Planning The comments received from the Town or Parish Council within the 21-day consultation period; or Triggers referral to Referral Panel Referral Panel Meeting and The comments received from the Ward Member Notifications sent to Ward within the 21-day consultation period; or members The comments received from a statutory consultee within the 21-day consultation period. Delegated to officers for 5. Within the 21 day consultation period a contrary No request for call in received during 5 days determination position to the officer recommendation is received from the Town or Parish Council and a request for Committee decision is received from a Ward Member, then a 5 day consultation period with Planning Committee member call-in process would be planning committee members triggered. In the event that only a Town/Parish Council response or Ward Member response is received then the Response from Planning Committee Member for call in during 5 day period existing Referral Panel process would proceed.



Appendix B: The key formal interaction points during the Planning Application Process

Accounts, including Town and Parish Councils receive a public access notification that a decision has been

made

Figure 3: A diagram of the application process with the key formal interaction points of Statutory Consultees

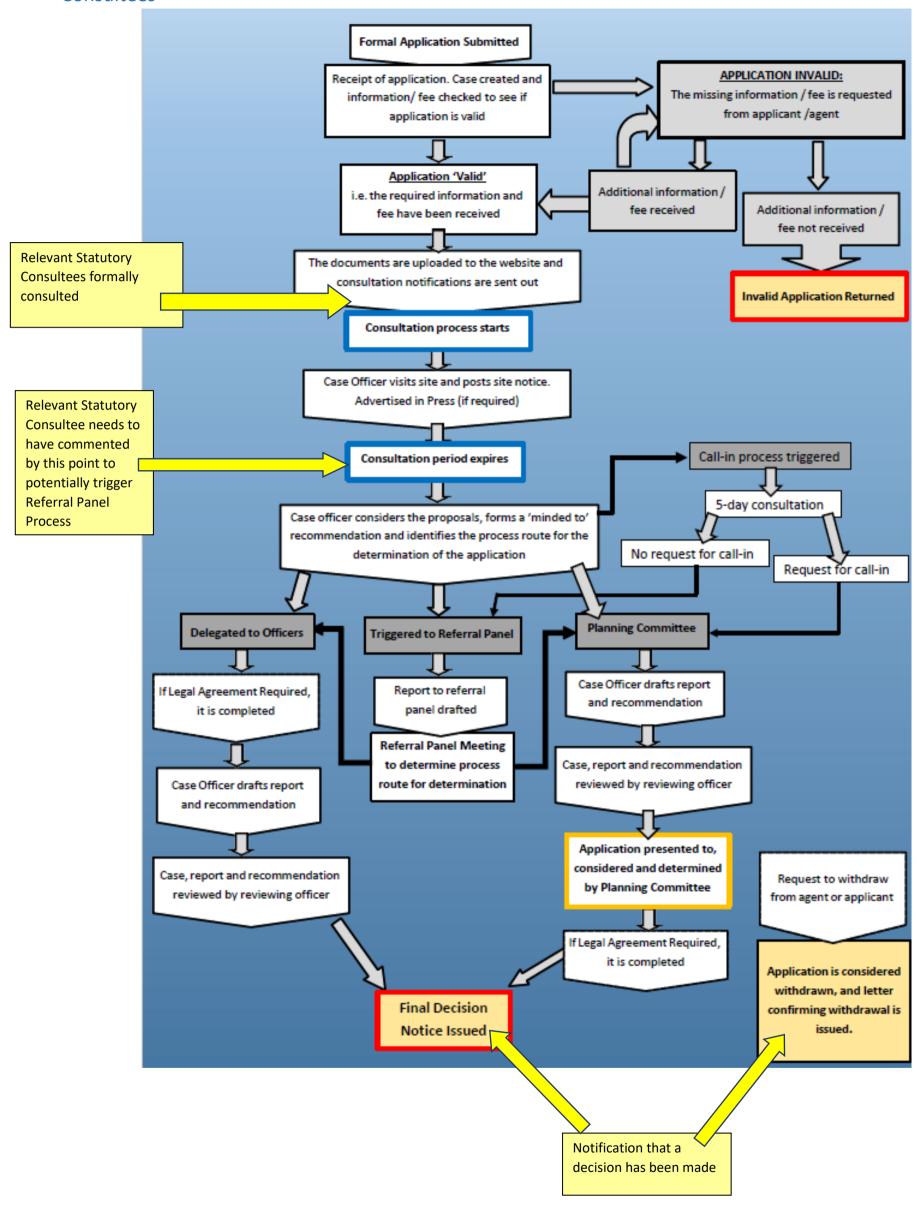
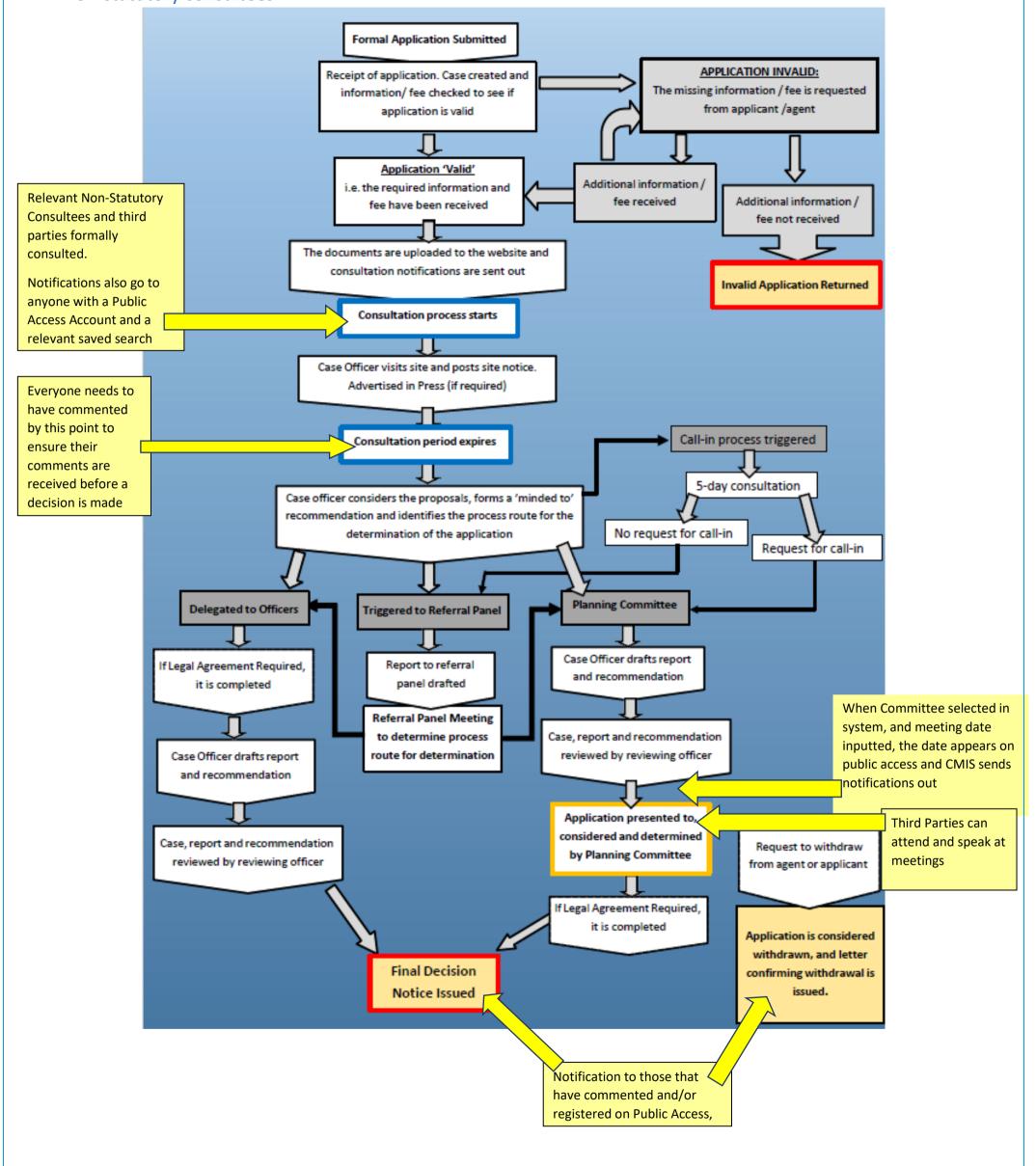


Figure 4: A diagram of the application process with the key formal interaction points of Third Parties and non-statutory consultees





Appendix C: The Planning Referral Panel Protocol

Figure 1: The Planning Referral Panel Protocol

1 July 2022



Planning Referral Panel Meeting Protocol / Terms of Reference

This protocol sets out the process/rules for Planning Referral Panel meetings that take place from 1 July 2022 onwards. It follows a process change that was agreed at Strategic Planning Committee on 6 June 2022 and allows for Ward Members to attend the Planning Referral Panel meetings to confirm if the item as presented is factually correct.

Ward Members can attend the Planning Referral Panel meetings, even if they have not responded/provided comments during the consultation process on the relevant application. However, they must recognise that this is not an opportunity for them to repeat the comments of local residents or their own views. They must respond, if required, solely to matters of fact related to material planning considerations relevant to the planning application.

If Ward Members wish their own views to be known these should be submitted during the consultation process earlier in the application process either via the <u>public access system</u> or via email to <u>planning@eastsuffolk.gov.uk</u>, so that they can be logged on the case file and officers made aware of their views. Comments should not be submitted as Teams messages. If/when written comments are submitted from Ward Members, they are provided to the Panel within the Officer Report. Comments received after the consultation period will still be considered but in accordance with the constitution but will not trigger the Referral Process.

Prior to the Meeting

On the last working day of the week prior to the meeting (usually a Friday, with the exception of Bank Holidays), the Panel Members, Portfolio Holder and Vice-Portfolio Holder shall be sent a copy of the officer report and PowerPoint slides for the presentation at the meeting. This will take place via a Teams chat message with link to the documents.

On the same day a notification of the Agenda/items scheduled for the next meeting shall be posted on the 'Teams' chat 'Notification of Upcoming Planning Referral Panel meetings'.

Any Ward members (other than the Panel Members, the Portfolio Holder and Vice-Portfolio holder) wishing to attend the meeting shall respond to the message to confirm their wish to

1

1 July 2022

attend. A Teams Meeting Link within a Microsoft Outlook calendar invite will then be sent to the relevant Member.

During the Planning Referral Panel meeting:

As has been the case previously, the meetings will continue to take place via Teams.

For each item before the Planning Referral Panel the following procedure/process steps shall be adhered to:

- The case officer (or another officer if appropriate in the case of staff absence) shall present the application to the panel with a PowerPoint presentation that includes the existing and proposed plans, site photographs and a summary of the comments from those parties that have triggered the referral process (i.e. the Town/Parish Council, Ward Member and/or statutory consultees).
- 2) The Panel Members may then ask questions of the officer.
- 3) The relevant Ward Member(s) (if in attendance) will be asked to confirm if the presentation was factually correct. If they consider there were factual inaccuracies related to the planning merits of the case they will be given the opportunity to explain/provide factual corrections.
- The Planning Referral Panel Members may ask follow up questions of the relevant Ward Member(s) and/or officers if clarification is required.
- 5) The Planning Referral Panel Members will then discuss the appropriate determination route. This debate must focus on whether it there is sufficient material planning merit to justify referring the application to North/South Planning Committee, or whether the application should be delegated to the Head of Planning and Coastal Management for determination or if the application should be deferred to a later Referral Panel meeting to enable clarification of any remaining factual 'inaccuracies' relating to material planning considerations

Material planning merits that may be relevant to justify referring to Planning Committee or delegating the determination of the application may include:

 Whether the comments raised by those triggering the process (i.e. the Town/Parish Council, Ward Member and/or statutory consultees), are of sufficient material relevance as to require debate in public.

And/or

 Whether there are any other relevant material aspects of the case not raised by those triggering the referral process, are of sufficient material relevance as to require debate in public.

2

1 July 2022

The Panel members may highlight if they consider a suggested planning condition is missing from the officer's recommendation, but they must not debate/determine the outcome of the application itself (i.e. if it should be approved or refused)

- 6) The relevant Ward Member(s) (if in attendance) will be asked to confirm if there were any factual inaccuracies during the discussion. If they consider there were factual inaccuracies relating to the planning merits of the case they will be given the opportunity to explain/provide factual corrections.
- 7) The Referral Panel Members can then seek clarification from officers, on any matters material to their decision and/or process before they make a decision. This decision is to be solely on the determination route of the application (i.e. as to whether the application should be referred to North / South Planning Committees or delegated to officer level for determination or deferred to a later Panel meeting if points of material planning clarification remain to be resolved). This decision is made by each member voicing their recommendation. The determination route is decided by the majority vote and is a recommendation to the Head of Planning Services and Coastal Management for his consideration.

After the Referral Panel Meeting

On every application that was considered at the Referral Panel, the case officer will notify the applicant/ agent, the Town/Parish Council and relevant Ward Member(s) of the outcome (i.e. if the application is to be determined at Planning Committee or is delegated to officer level for determination). These notifications are usually sent out within 24 hours of the Referral Panel Meeting.

3



Appendix D: The notifications sent to Ward Members of upcoming Planning Referral Panel Meetings and to Planning Committee Members of the Call-in process.

Figure 1: A screenshot of the "Notification of Upcoming Planning Referral Panel Meetings" Teams chat, showing the type of notification all ward members receive every week

26 April

26/04 15:57

All Members,

This is your weekly notification of items that are on the agenda for the next Planning Referral Panel meeting, so that you are made aware of any items within your ward.

The next Planning Referral Panel meeting will take place on Tuesday 30 April 2024 at 9:30am via Teams.

The agenda for the next meeting is

Item 1 – DC/23/1433/FUL, Demolition of existing vacant commercial building and construction of five storey mixed use building comprising of residential dwellings (Class C3) on the upper stories and commercial (Class E) on the ground floor with cycle parking, bin storage and amenity space. 141 London Road North, Lowestoft, Suffolk, NR32 1ND. See application reference DC/23/1433/FUL on Public Access

Item 2 - DC/24/0380/FUL, Conversion of the existing 6 bed residential property to an 8 bed HMO (Sui Generis), 33 Milton Road East, Lowestoft, Suffolk, NR32 1NU. See application reference DC/24/0380/FUL on <u>Public Access</u>

Item 3 – DC/24/0404/FUL, Alterations and extensions to existing bungalow including new roof with first floor living accommodation. 99 Playford Road, Rushmere St Andrew , IP4 5RQ. See application reference DC/24/0404/FUL on Public Access

Item 4 – DC/24/0653/FUL - Land for use of Horses and Stables, Meadow View Cottage, 1 Charity Cottages, Swilland Road, Otley, IP6 9NE. See application reference DC/24/0653/FUL on <u>Public Access</u>

Item 5 - DC/24/0533/FUL - Temporary retention of groundwater monitoring equipment for ground investigation purposes. Wood Farm, Church Hill, Saxmundham, Suffolk, IP17 1XE. See application reference DC/24/0533/FUL on Public Access

Item 6 – DC/24/0695/FUL, Creation of a play area measuring 180sqm to the side of the village hall.

Darsham Village Hall, Cheyney Green, Darsham, IP17 3FA. See application reference DC/24/0695/FUL on Public Access

Those members with items in their wards are: Janet Craig, Tess Gandy, Keith Patience, Dan Clery, Colin Hedgley, John Fisher and Paul Ashton

The link to join the Teams meeting just before it starts is here: Click here to join the meeting

0

Figure 2: A copy of the template for emails notifying/consulting Planning Committee members of the call-in process (trigger 5 in the constitution)

Planning Committee Members,

I am writing to inform you that the following planning application has triggered the Planning Committee Member Call-in process under trigger point 5 of the Scheme of Delegation as set out in the constitution.

Application Reference:	XXX
Application Description:	XXX
Address:	XXX

The application and documents can be viewed on public access.

Link to view application on public access

The application has triggered this process because the views of the Town/Parish Council and the Ward Member were contrary to the 'minded to' decision of the Planning Officer during the 21-day consultation period.

The comments submitted by XXXXXXXX Town/Parish Council during the 21 day consultation period were:

The attached comments submitted by the Ward Member during the 21 day consultation period were:

As case officer I am minded to recommend the application for XXXXXX

Any Planning Committee member calling in the <u>application_must</u> respond within 5 working days of this email setting out how you consider it meets the expectation that:

"The proposal would be of significant public interest; would have a significant impact on the environment; or should otherwise be referred to Members due to its significance in some other respect".

You must 'reply to all' and copy in:

The Town/Parish Council: ADD NAME AND EMAIL
The Ward Member(s): ADD NAMES EMAIL

A call-in request must be received by SPM ON DATE (date to insert here is 5pm on the 5th day when email sent before 5pm the week before)

The first call-in request received from a Planning Committee member will be treated as the relevant call-in. After this no further call-in replies are required.

If no call-in request is received, the application will proceed to Referral Panel for consideration of the method of <u>determination</u>

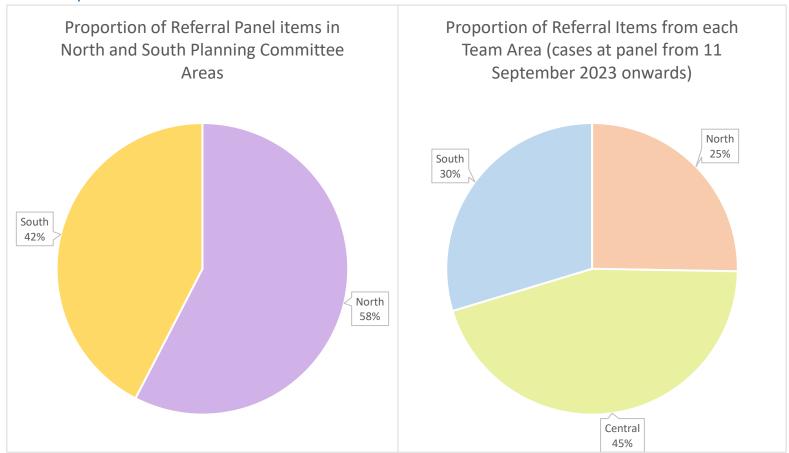
Regards

XXXXXXXXXXXXXXXXXX



Appendix E: The numbers, proportions and scale of applications at the Planning Referral Panel

Figure 1: The Proportion of Referral Panel Items in the North/South Planning Committee Areas between 1 April 2023 and 31 March 2024, and the proportion of Referral Items in the North/Central/South Team areas from 11 September 2023 to 31 March 2023



Note: A map of the area boundaries can be found at DMParishes-with-contact-info.pdf (eastsuffolk.gov.uk)

Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024

31 | Page

Figure 2: The number of Majors, Minors and Others at Referral Panel between 1 April 2023 and 31 March 2024

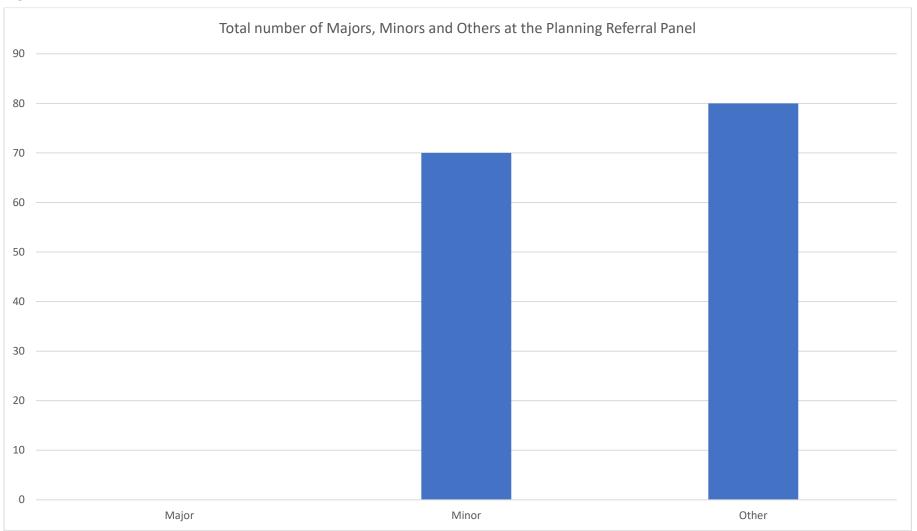


Figure 3: The percentage of items that were Majors, Minors and Others at Referral Panel between 1 April 2023 and 31 March 2024

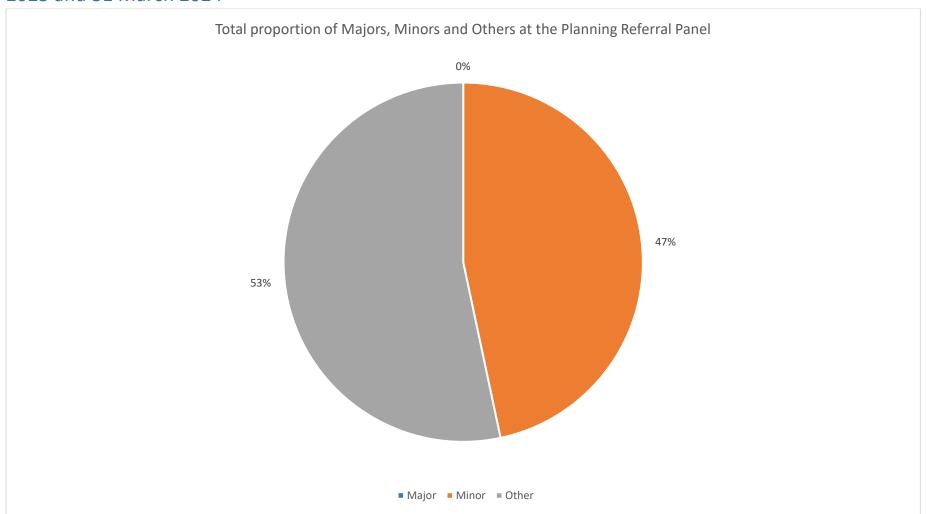


Figure 4: The Percentage of Majors, Minors and Others within the North Area at Referral Panel between 1 April 2023 and 31 March 2024

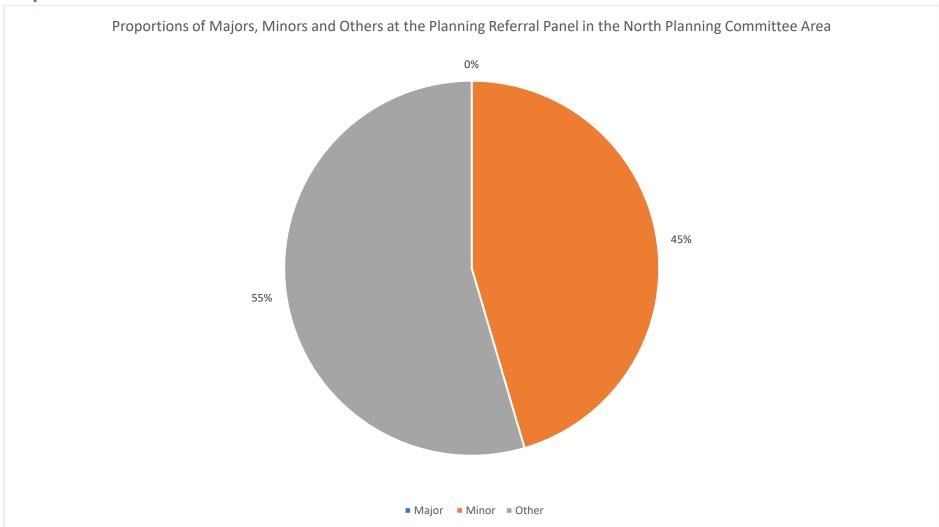


Figure 5: The Percentage of Majors, Minors and Others within the South Area at Referral Panel between 1 April 2023 and 31 March 2024

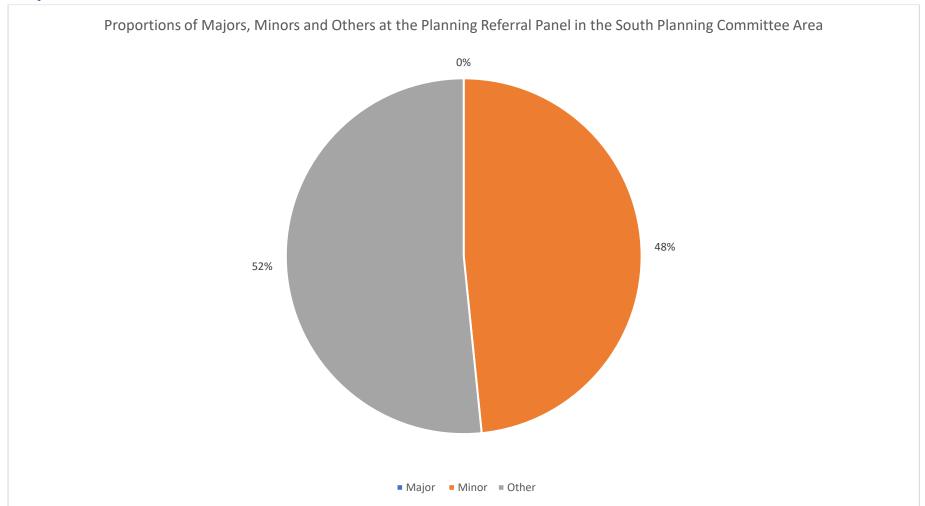
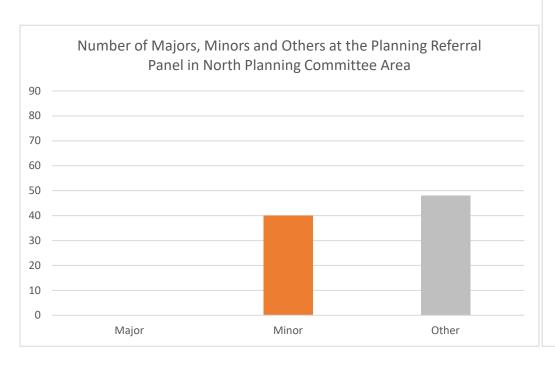


Figure 6: The Number of Majors, Minors and Others within Planning Committee North Area at Referral Panel between 1 April 2023 and 31 March 2024



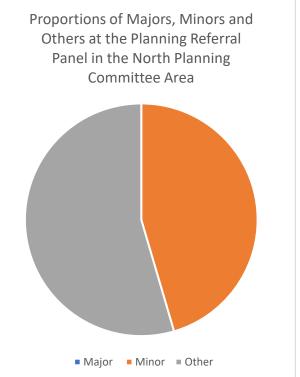
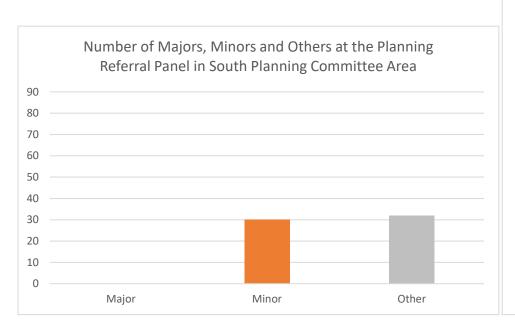


Figure 7: The Number of Majors, Minors and Others within Planning Committee South Area at Referral Panel between 1 April 2023 and 31 March 2024



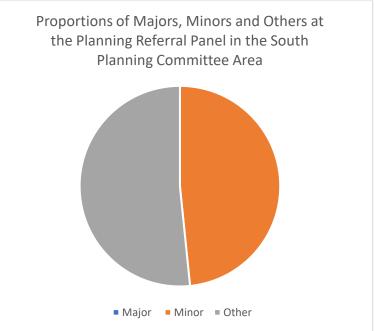


Figure 8: The Number of Majors, Minors and Others at each meeting of the Referral Panel between 1 April 2023 and 31 March 2024

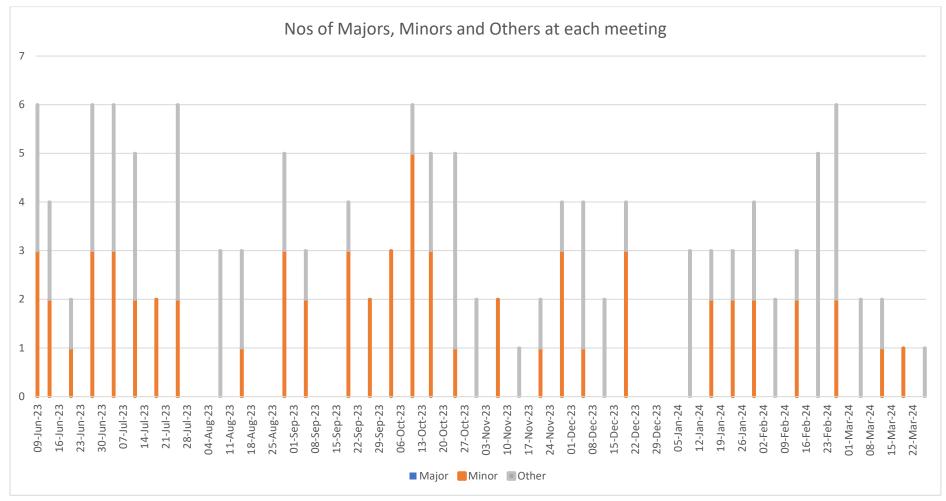


Figure 9: The Proportion of Majors, Minors and Others at each meeting of the Referral Panel between 1 April 2023 and 31 March 2024

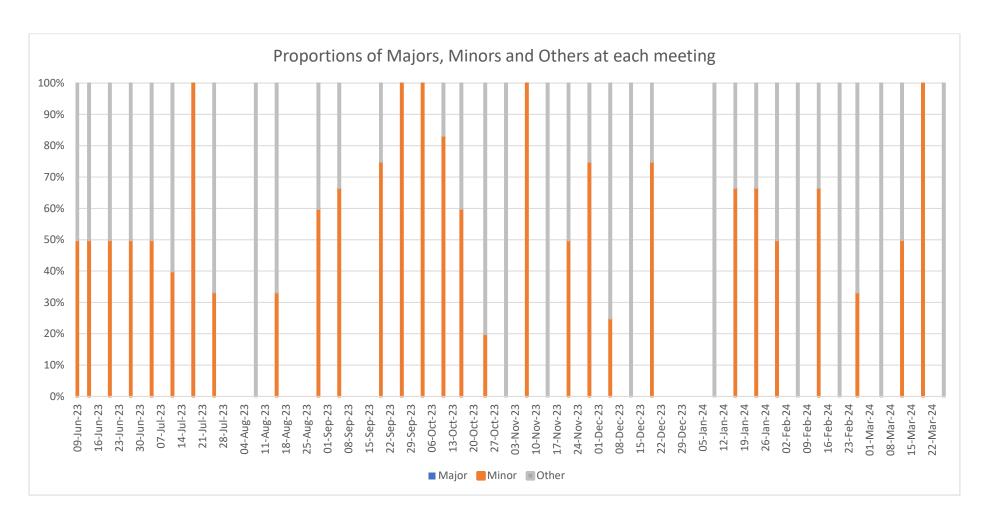


Figure 10: The total number of items at the Planning Referral Panel per year, since the Panel was introduced.

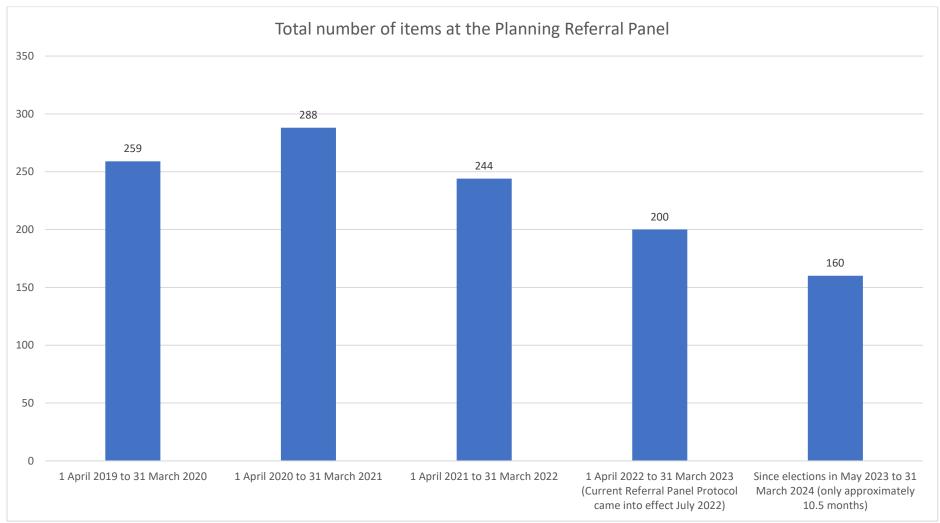


Figure 11: The Number/Proportion of items at the Planning Referral Panel that the Panel referred to Planning Committee or delegated to Officers per year since the Planning Referral Panel was introduced.

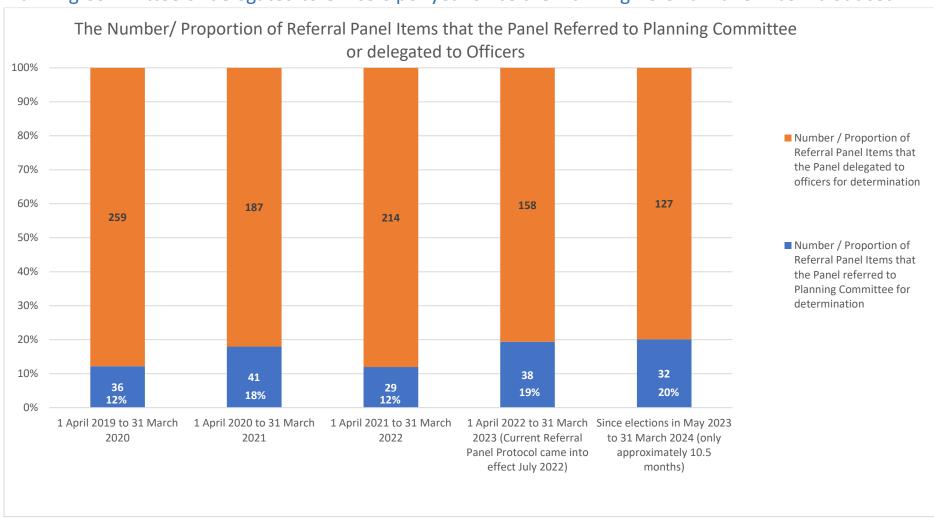
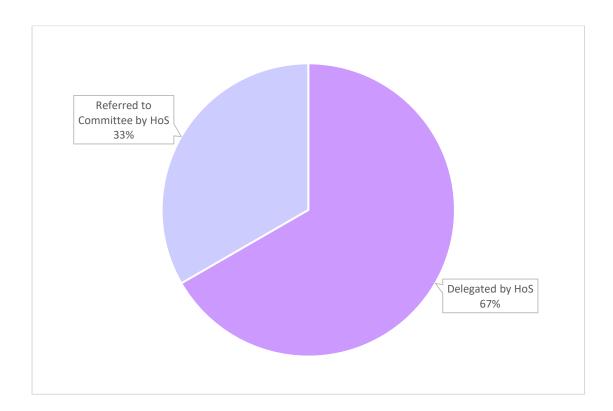


Figure 12: The split of votes on items at the Referral Panel between May 2023 and 31 March 2024 Vote Split 2 Delegated / 2 Absent ■ 1 Delegate / 1 Committee / 1 Obstain / 1 Absent - HoS 2% 2 Delegate / 1 Obstain / 1 absent decision 0% 2 Delegate / 1 Committee / 1 Obstain 1 Delegate / 1 Committee / 2 Obstain - HoS Decision 2 Delegate/ 1 Committee / 1 Absent 1% 1 Delegate / 1 Committee / 2 Absent - HoS Decision 2 Delegated / 2 Committee - HoS Decision N/a - Withdrawn 3 Delegate / 1 Obstain 0% ■ 3 Delegate / 1 Committee 9% 2 Committee / 2 Absent 1% 2 Committee / 1 Delegate / 1 Obstain All 4 Delegate 36% 2 Committee / 1 obstain / 1 Absent 2 Committee / 1 Delegate / 1 Absent 3 Committee/1 Delegate 3% All Committee (3 in attendance/ 1 Absent) All Delegate (3 in attendance/ 1 Absent) All 4 Committee

Figure 13: The outcomes of items that were an even vote by the Referral Panel, so referral/delegation decided by the Head of Service





Appendix F: The numbers of items per meeting for each ward at each of the Referral Panel meetings between 1 April 2023 and 31 March 2024

Figure 1: The number of items per Planning Referral Panel Meeting between 1 April 2023 and 31 March 2024

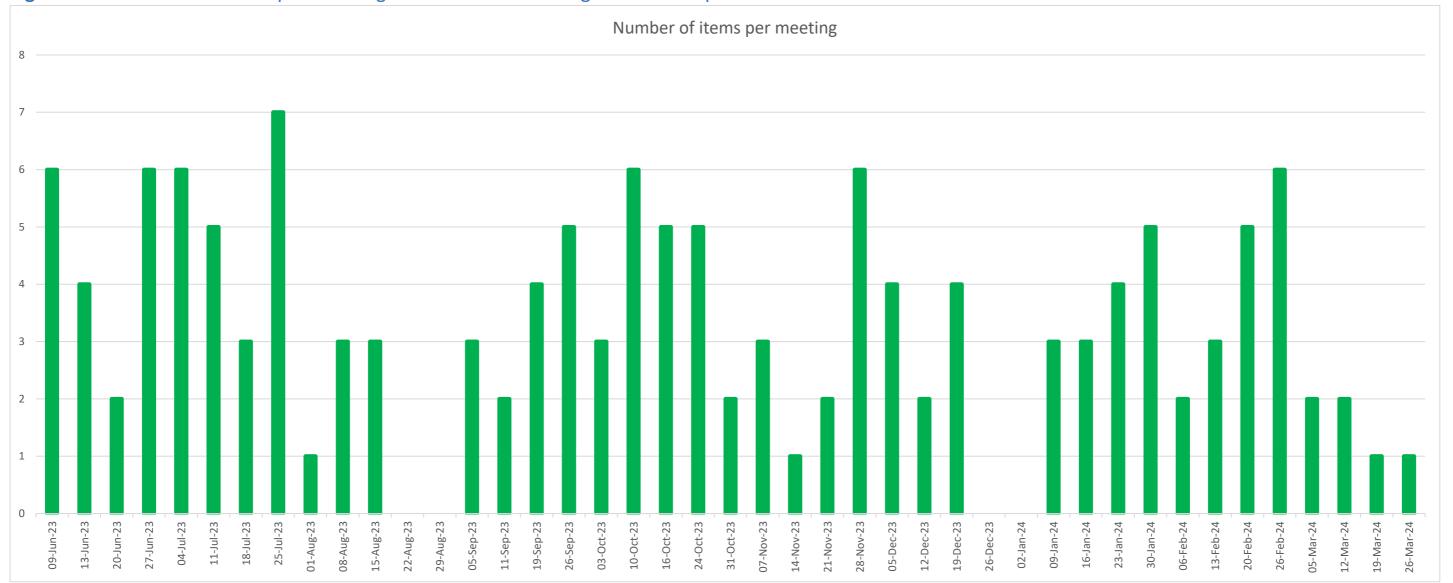


Figure 2: The Proportion of items from each Ward at each meeting between 1 April 2023 and 31 March 2024 (actual numbers shown by ward in Figures 3-31)

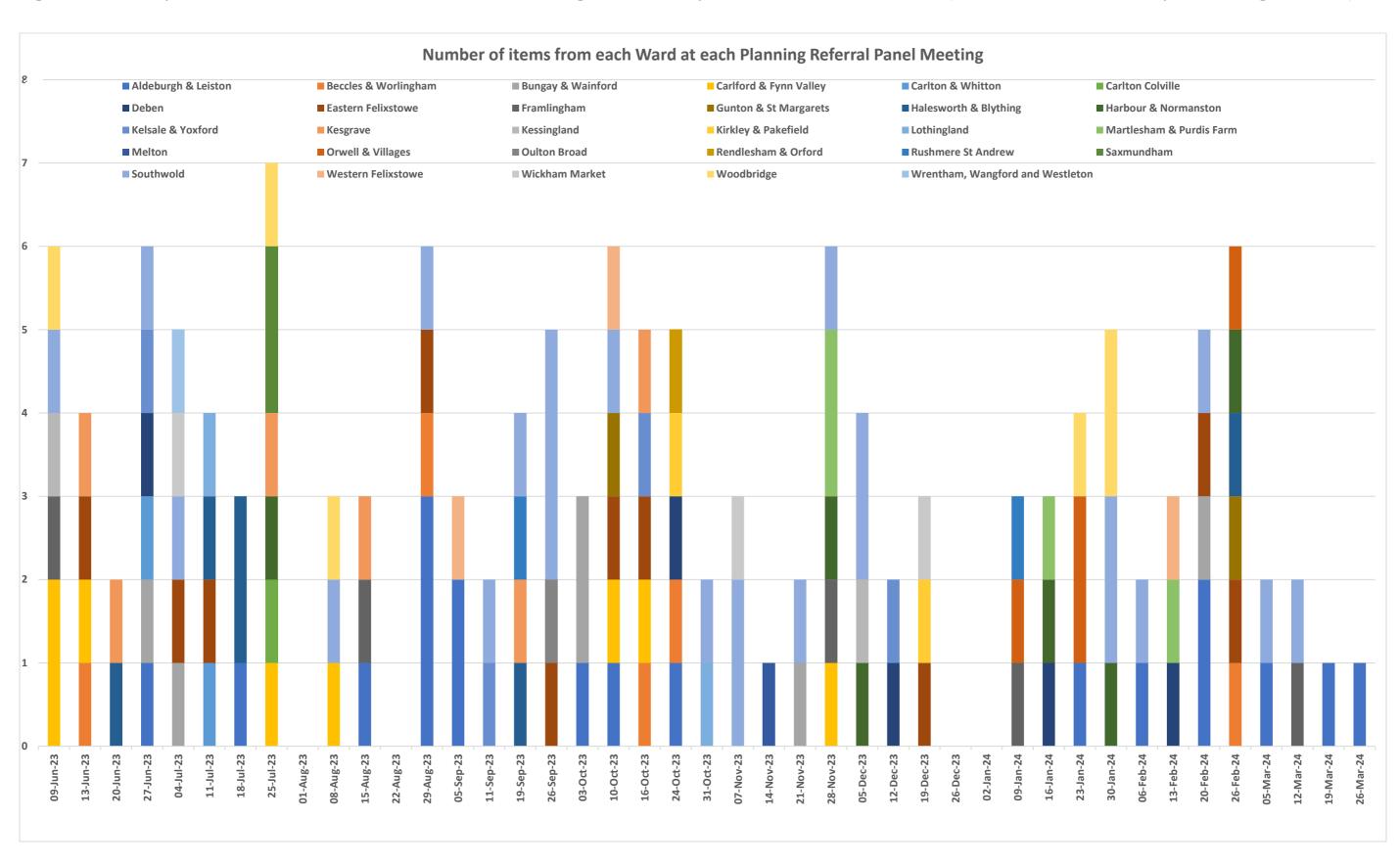


Figure 3: The number of items from Aldeburgh and Leiston Ward at each meeting between 1 April 2023 and 31 March 2024

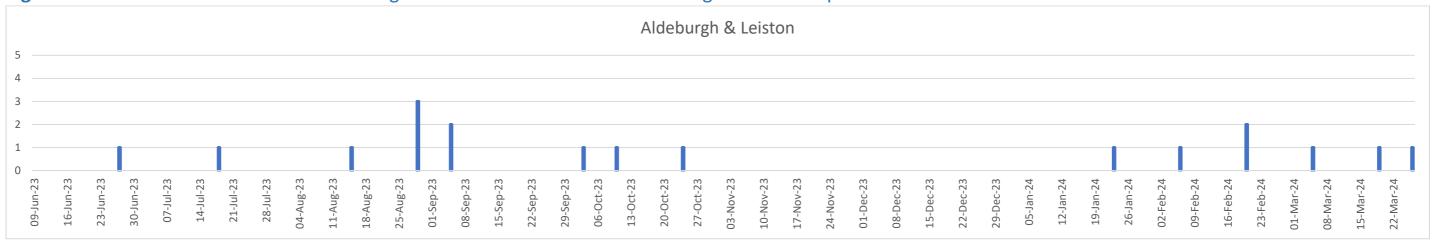


Figure 4: The number of items from Beccles and Worlingham Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 5: The number of items from Bungay and Wainford Ward at each meeting between 1 April 2023 and 31 March 2024

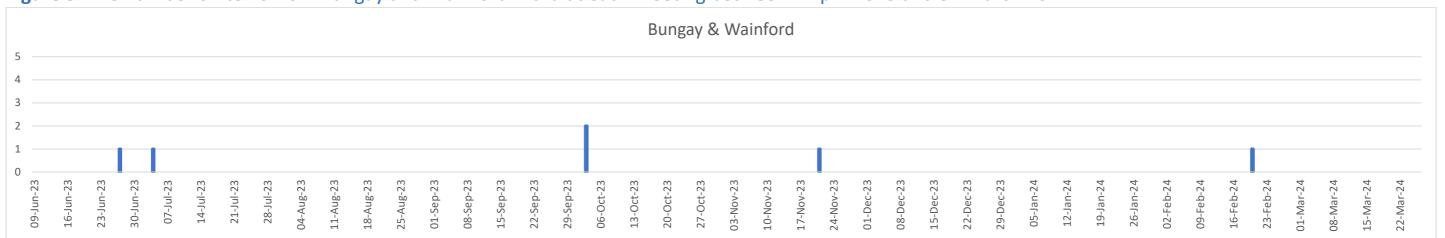


Figure 6: The number of items from Carlford and Fynn Valley Ward at each meeting between 1 April 2023 and 31 March 2024

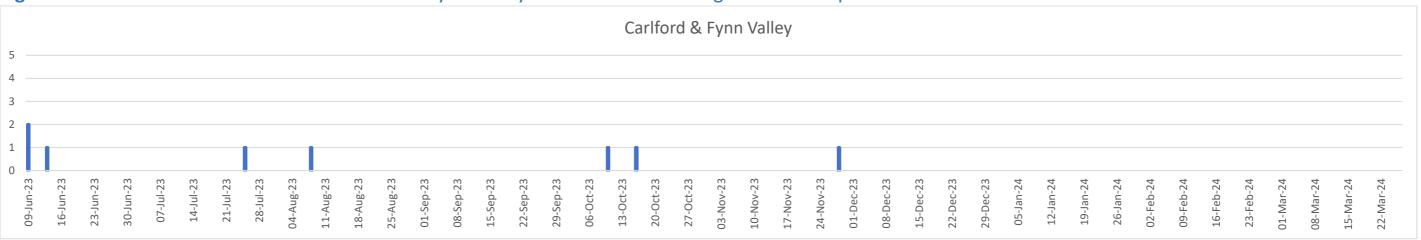


Figure 7: The number of items from Carlton and Whitton Ward at each meeting between 1 April 2023 and 31 March 2024

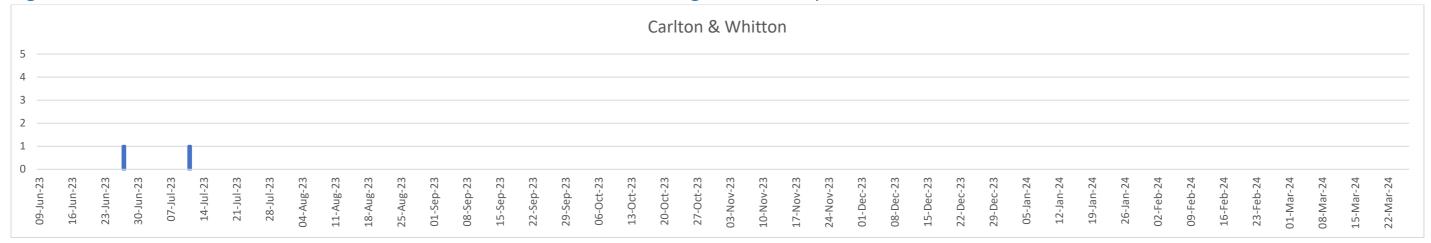


Figure 8: The number of items from Carlton Colville Ward at each meeting between 1 April 2023 and 31 March 2024

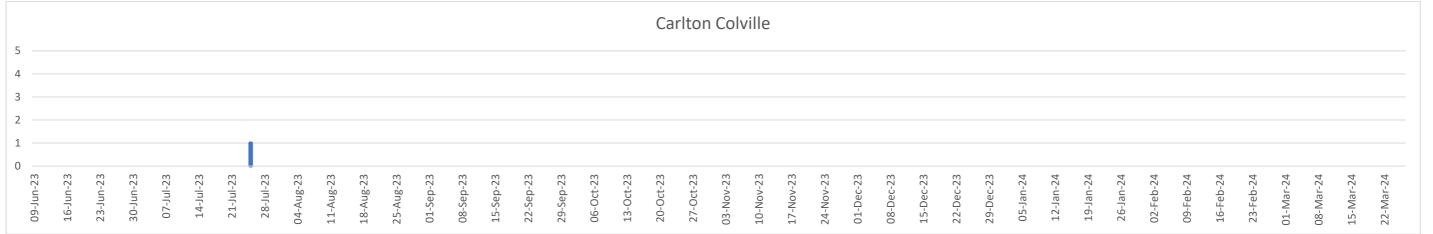


Figure 9: The number of items from Deben Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 10: The number of items from Eastern Felixstowe Ward at each meeting between 1 April 2023 and 31 March 2024

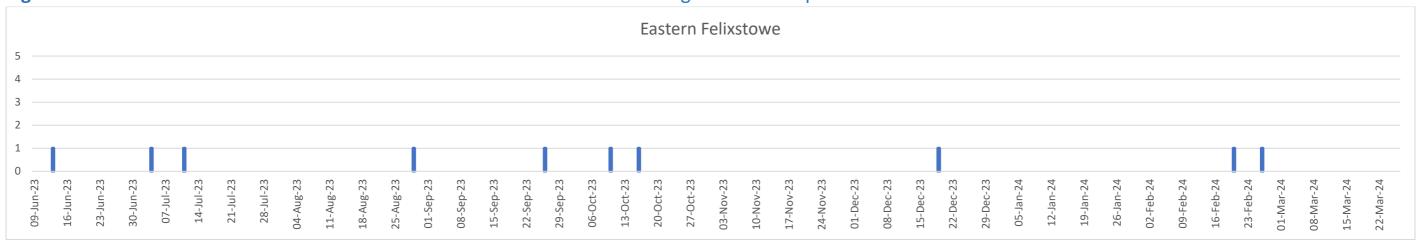


Figure 11: The number of items from Framlingham Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 12: The number of items from Gunton & St Margarets Ward at each meeting between 1 April 2023 and 31 March 2024

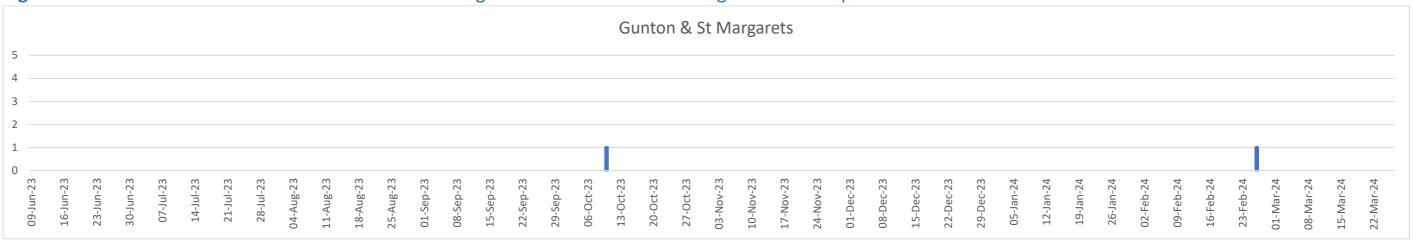


Figure 13: The number of items from Halesworth & Blything Ward at each meeting between 1 April 2023 and 31 March 2024

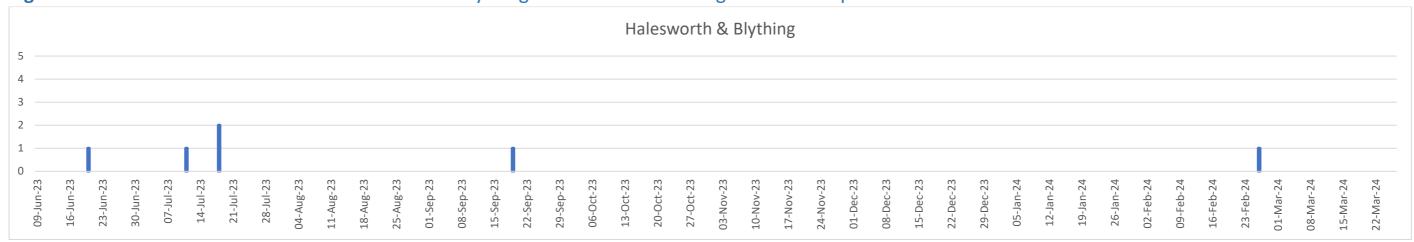


Figure 14: The number of items from Harbour and Normanston Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 15: The number of items from Kelsale and Yoxford Ward at each meeting between 1 April 2023 and 31 March 2024

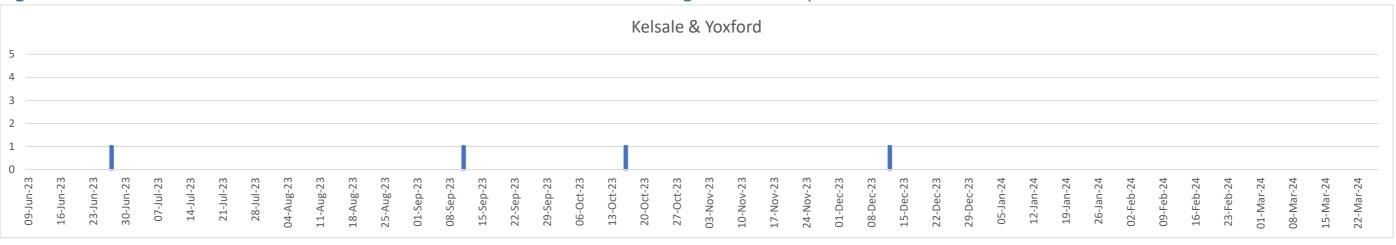


Figure 16: The number of items from Kesgrave Ward at each meeting between 1 April 2023 and 31 March 2024

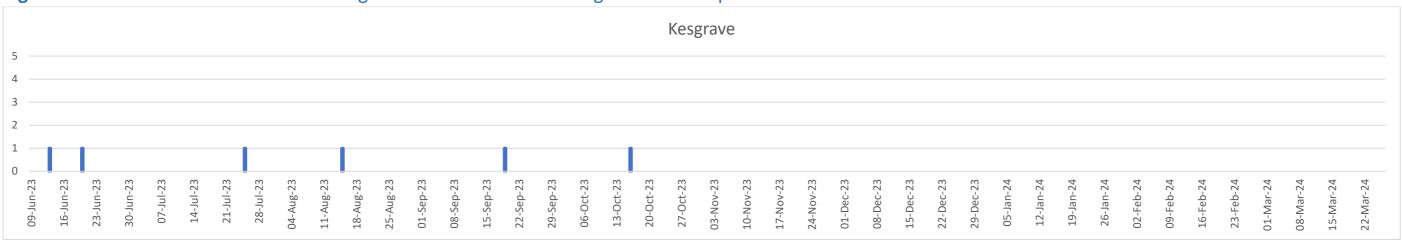


Figure 17: The number of items from Kessingland Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 18: The number of items from Kirkley and Pakefield Ward at each meeting between 1 April 2023 and 31 March 2024

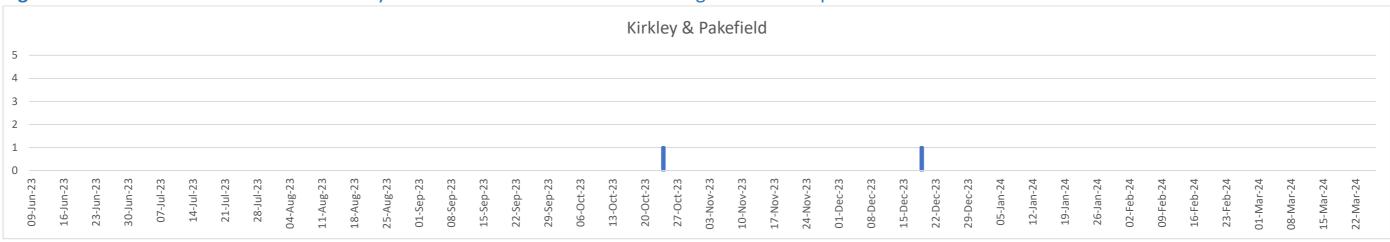


Figure 19: The number of items from Lothingland Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 20: The number of items from Martlesham & Purdis Farm Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 21: The number of items from Melton Ward at each meeting between 1 April 2023 and 31 March 2024

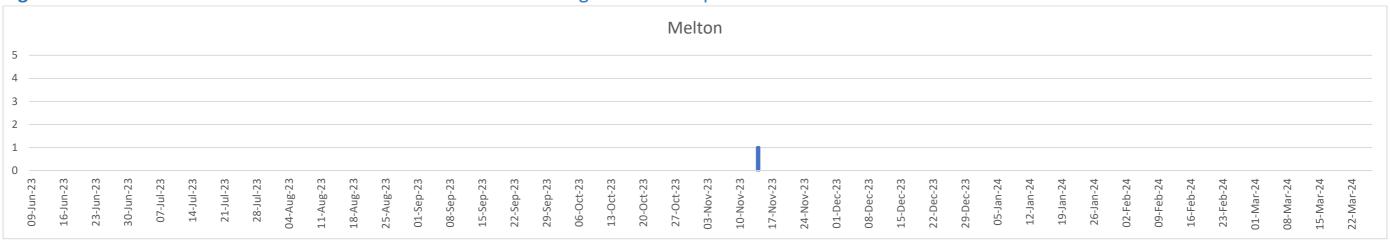


Figure 22: The number of items from Orwell & Villages Ward at each meeting between 1 April 2023 and 31 March 2024

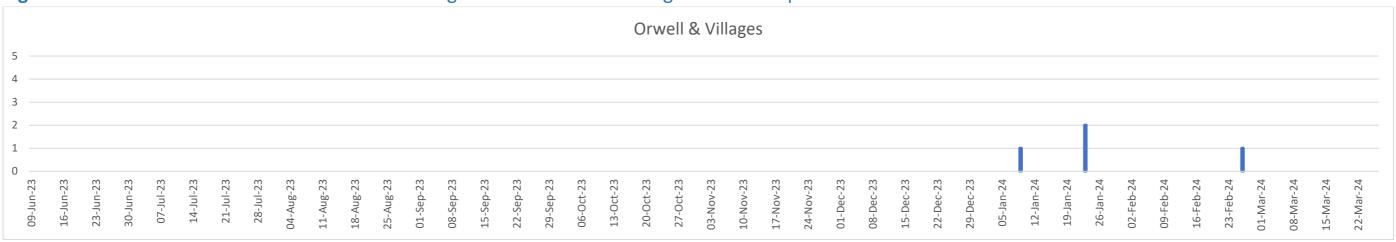


Figure 23: The number of items from Oulton Broad Ward at each meeting between 1 April 2023 and 31 March 2024

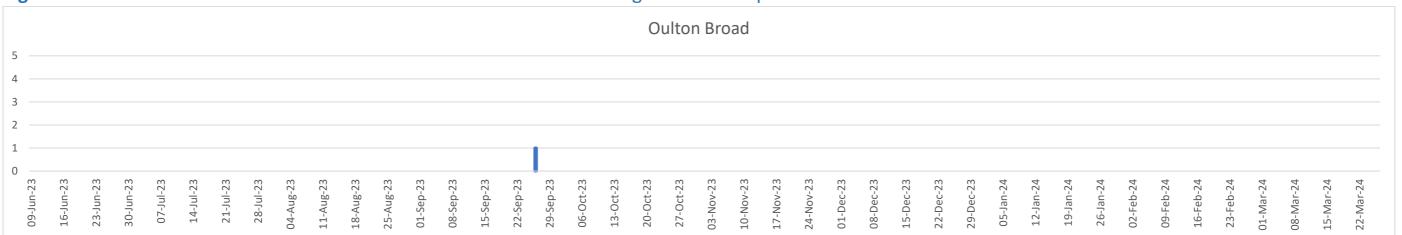


Figure 24: The number of items from Rendlesham and Orford Ward at each meeting between 1 April 2023 and 31 March 2024

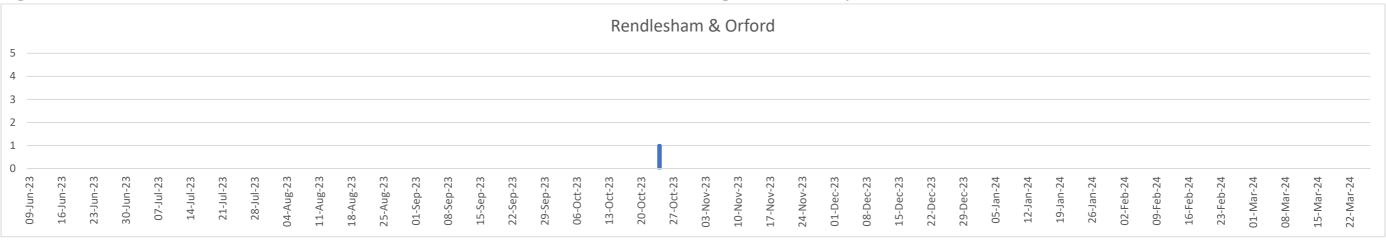


Figure 25: The number of items from Rushmere St Andrew Ward at each meeting between 1 April 2023 and 31 March 2024

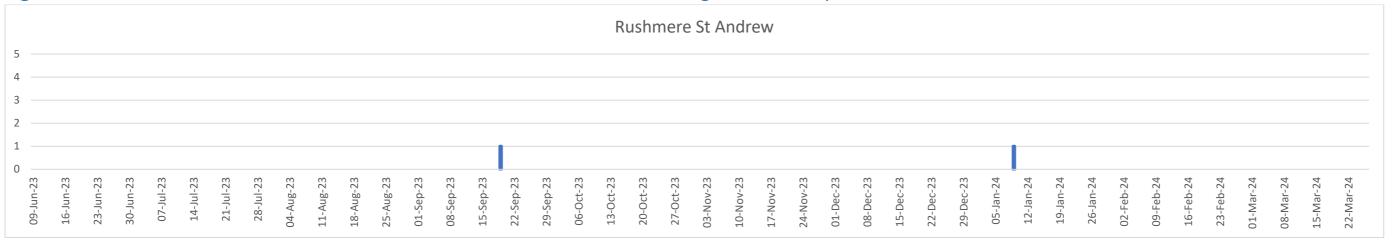


Figure 26: The number of items from Saxmundham Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 27: The number of items from Southwold Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 28: The number of items from Western Felixstowe Ward at each meeting between 1 April 2023 and 31 March 2024

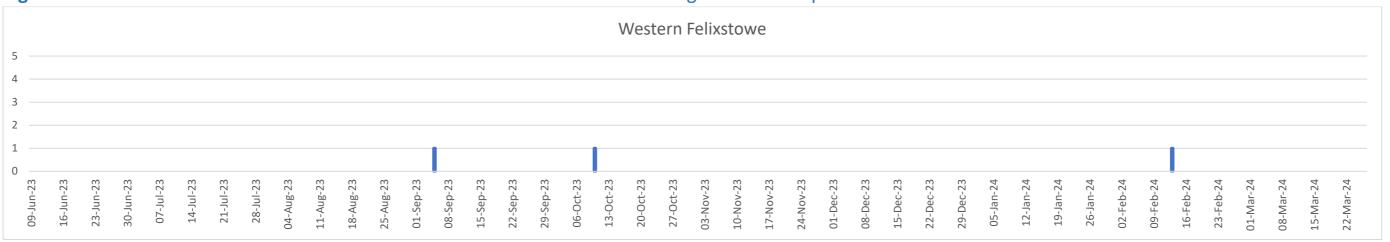


Figure 29: The number of items from Wickham Market Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 30: The number of items from Woodbridge Ward at each meeting between 1 April 2023 and 31 March 2024



Figure 31: The number of items from Wrentham, Wangford and Westleton Ward at each meeting between 1 April 2023 and 31 March 2024





Appendix G: The numbers and proportions of Planning Applications at the Planning Referral Panel, shown by ward

Figure 1: Number of items at Referral Panel (by Ward) between 1 April 2023 and 31 March 2024

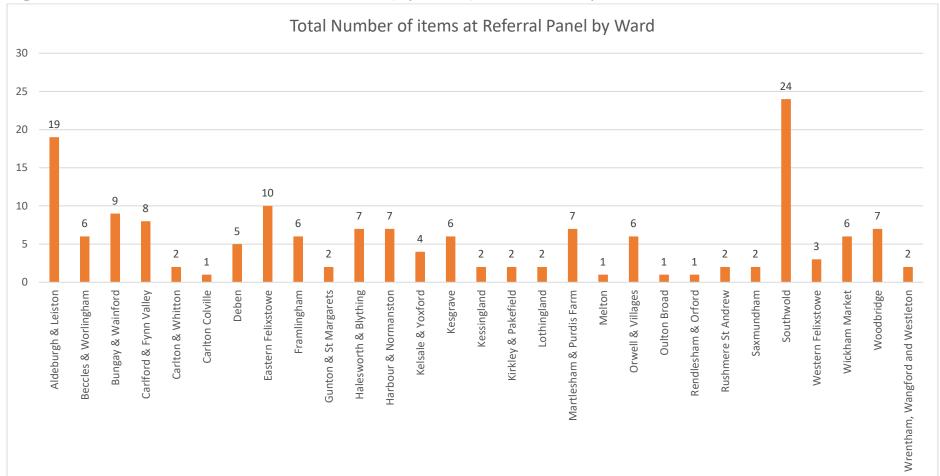


Figure 2: Number of Planning Applications in each ward that could trigger the referral process, between 1 April 2023 and 31 March 2024

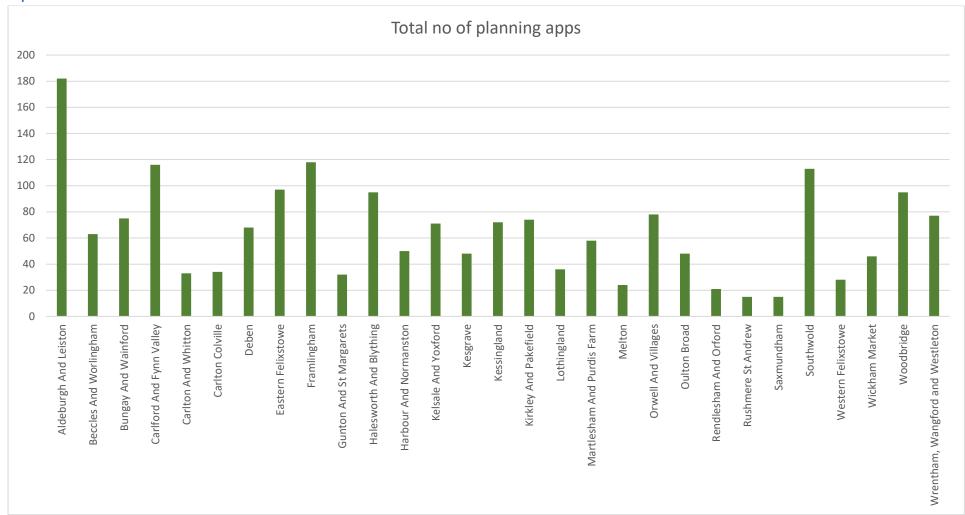


Figure 3: Number of Planning Applications that have triggered the Referral Panel/could have triggered the referral panel process (shown by ward in alphabetical order) between 1 April 2023 and 31 March 2024

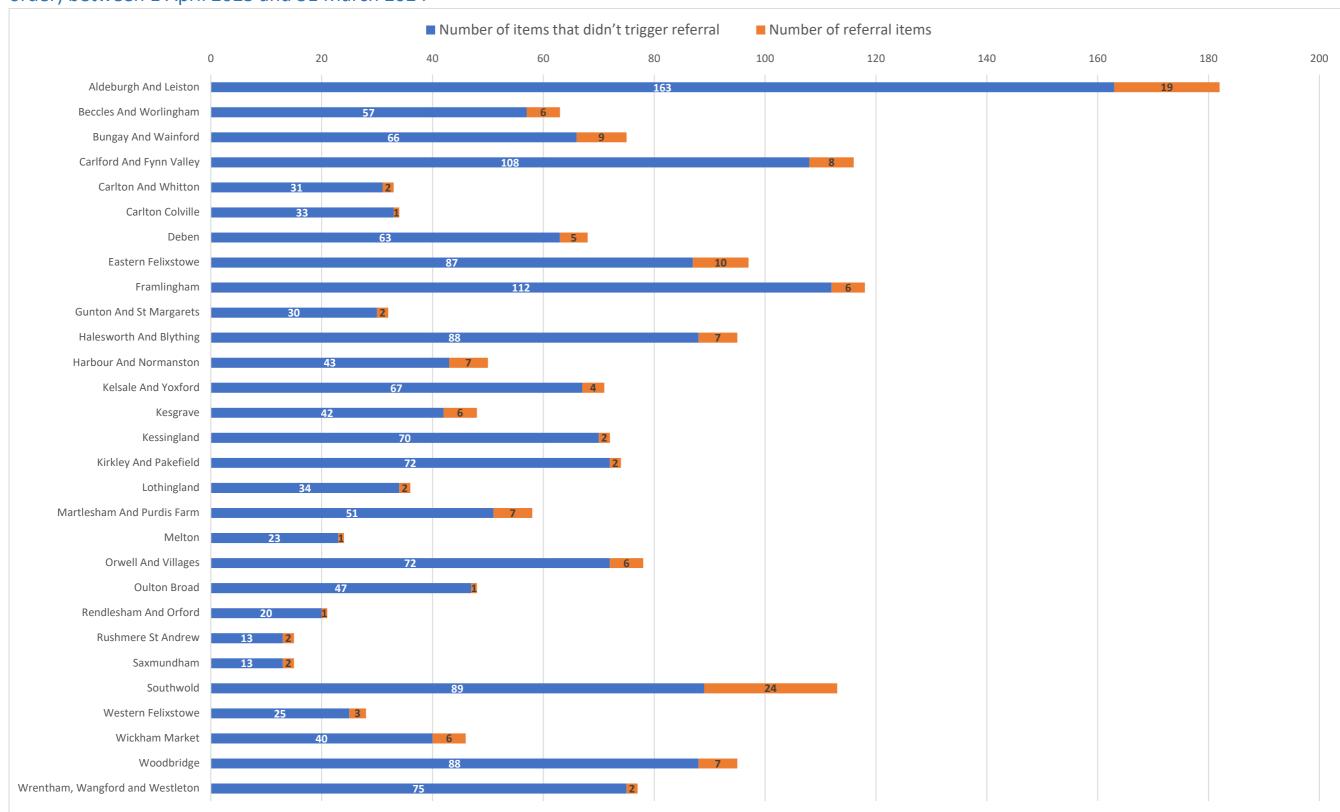
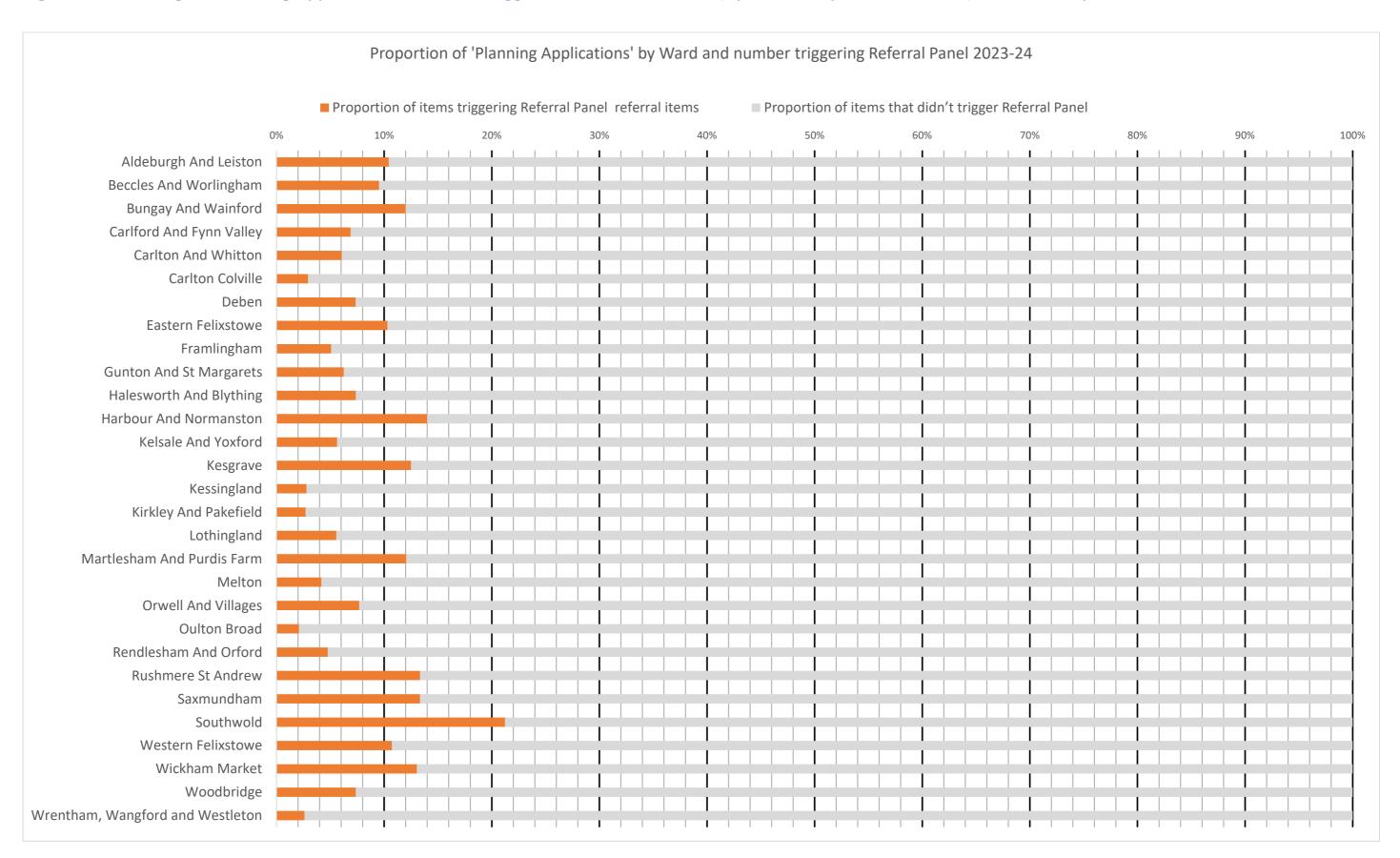


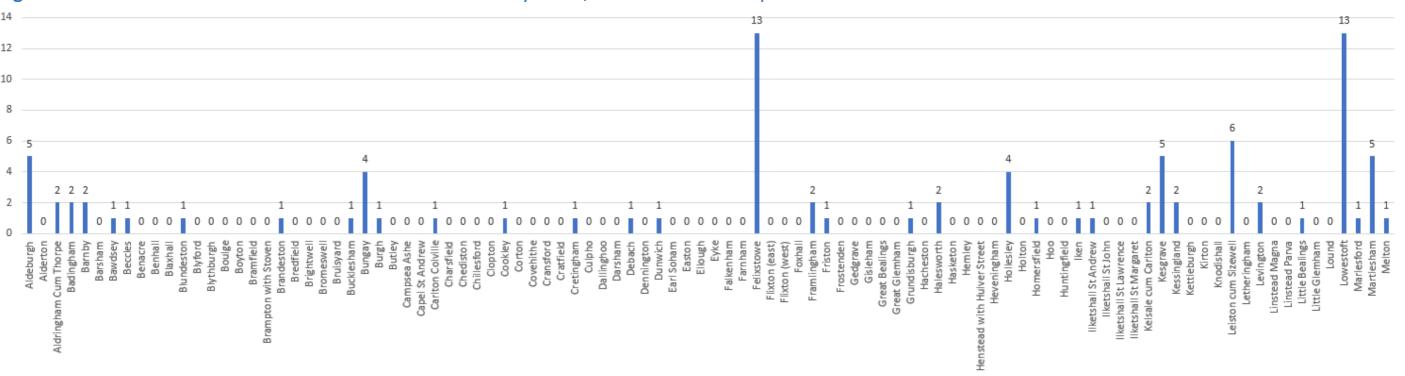
Figure 4: Percentage of Planning Applications that have triggered the Referral Panel (by ward in alphabetical order) between 1 April 2023 and 31 March 2024





Appendix H: The numbers and proportions of Planning Applications at the Planning Referral Panel, shown by Town/Parish

Figure 1: The number of items at the Referral Panel shown by Town/Parish between 1 April 2023 and 31 March 2024



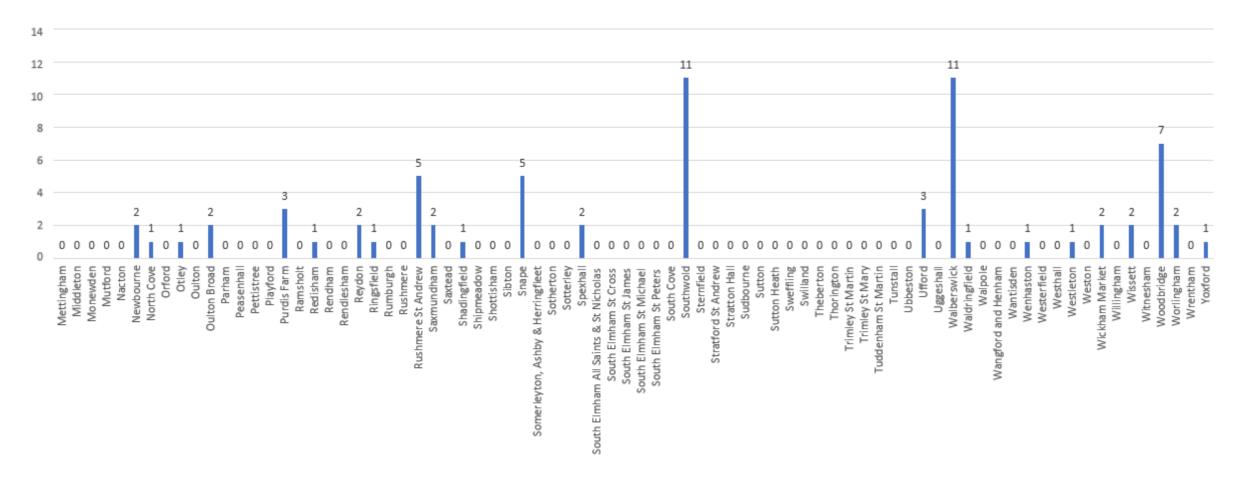
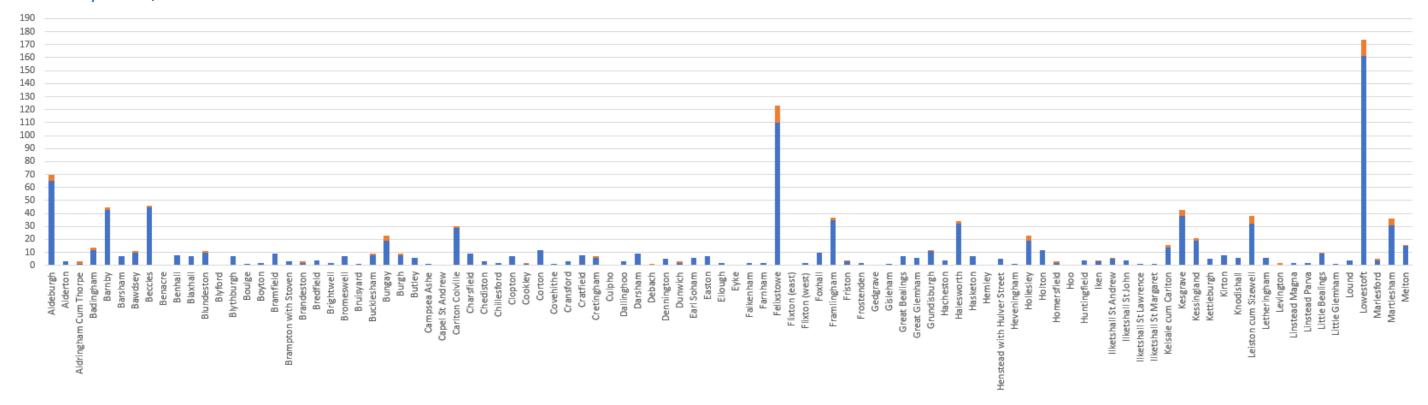


Figure 2: The Number of Planning Applications going through/not going through the Planning Referral Panel Process between 1 April 2023 and 31 March 2024, shown by Town/Parish.



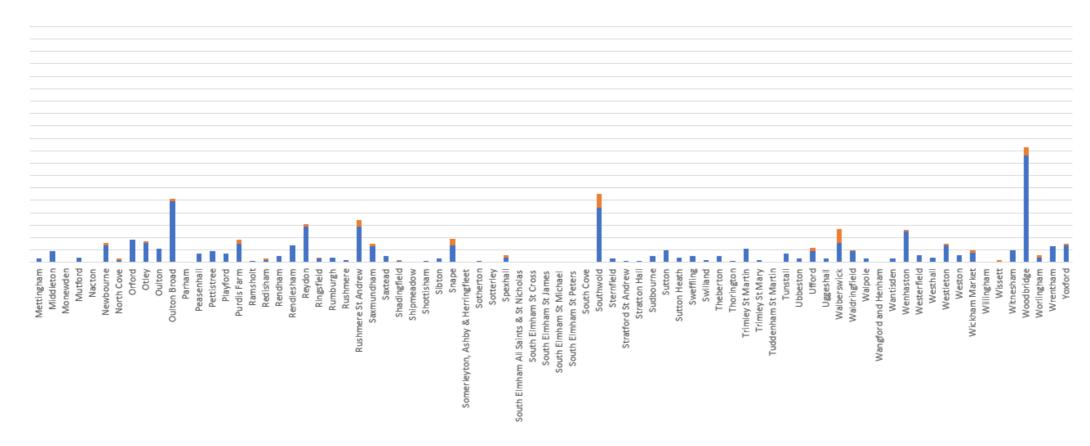
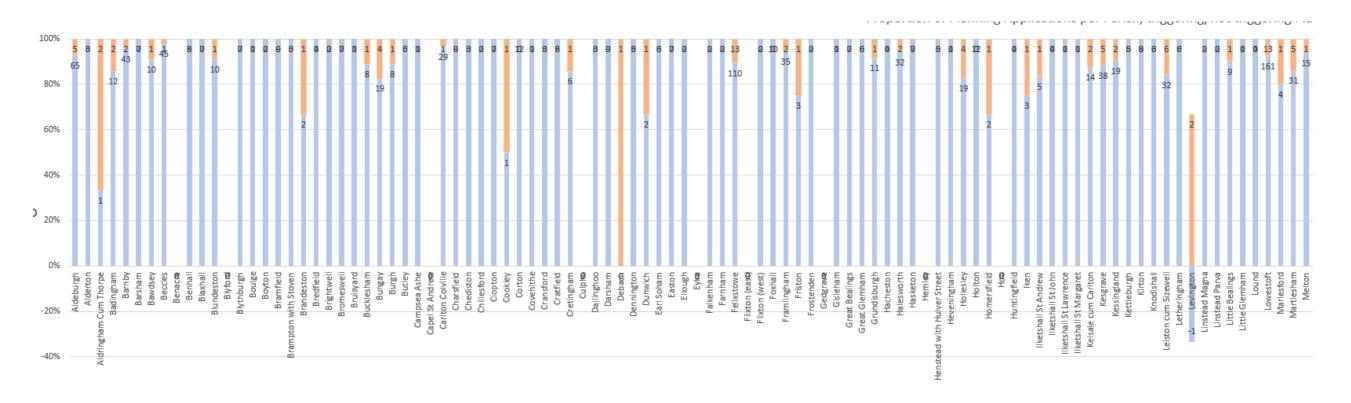
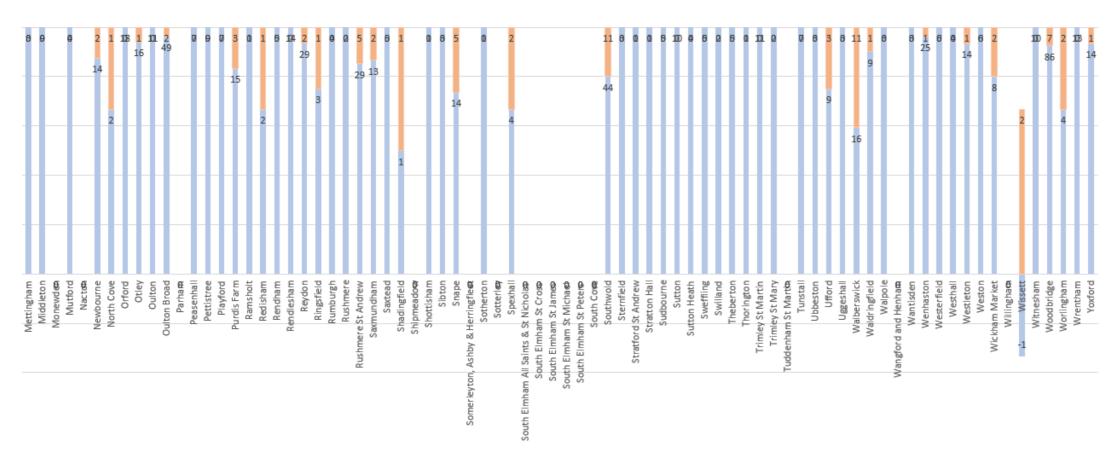


Figure 3: The Proportion of Planning Applications going through/not going through the Planning Referral Panel Process between 1 April 2023 and 31 March 2024, shown by Town/Parish







Appendix I: The number and proportion of items at the Planning Referral Panel with/without comments from relevant Ward Members, shown by Town/ Parish for the period 1 April 2022 – 31 March 2023

Figure 1: The number of items at Planning Referral Panel with Objections from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024

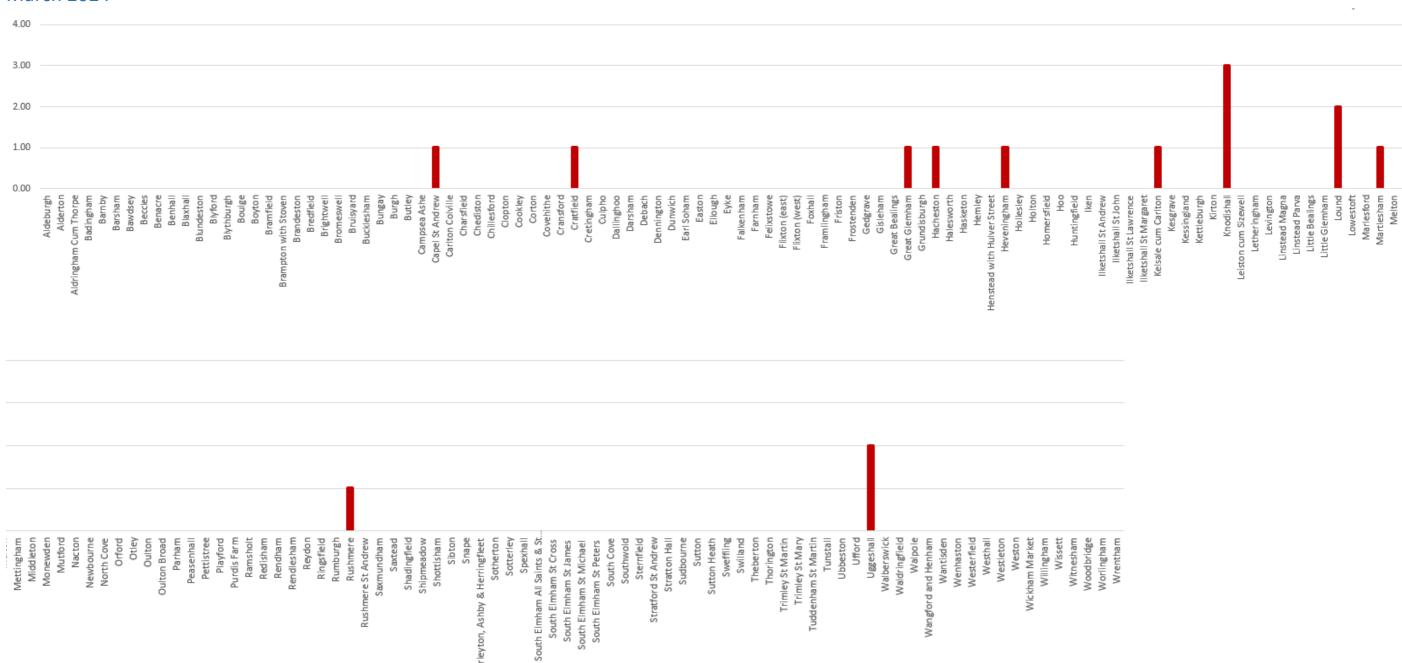
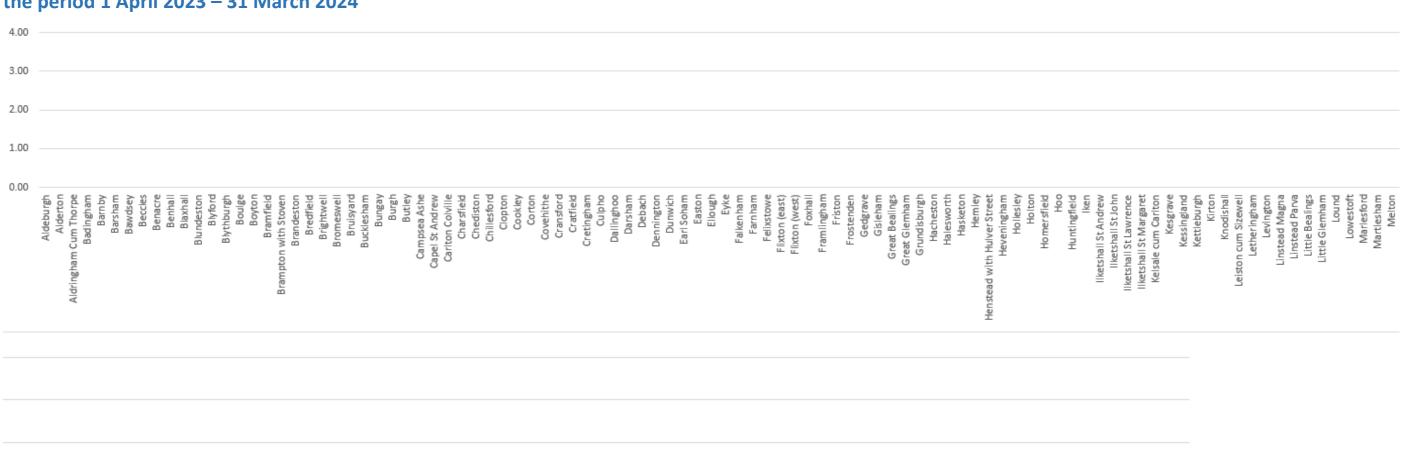


Figure 2: The number of items at Planning Referral Panel with No Objections/Neutral comments from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024



Mettingham
Middleton
Monewden
Monewden
Mutford
Nacton
Newbourne
North Cove
Orford
Outon
North Cove
Orford
Outon
North Cove
Orford
Outon
Snape
South Elmham St James
South Elmham
Sution Heath
Sution Heath
South Elmham St James
South Elmham St James
South Elmham St James
J

Figure 3: The number of items at Planning Referral Panel with Support from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024

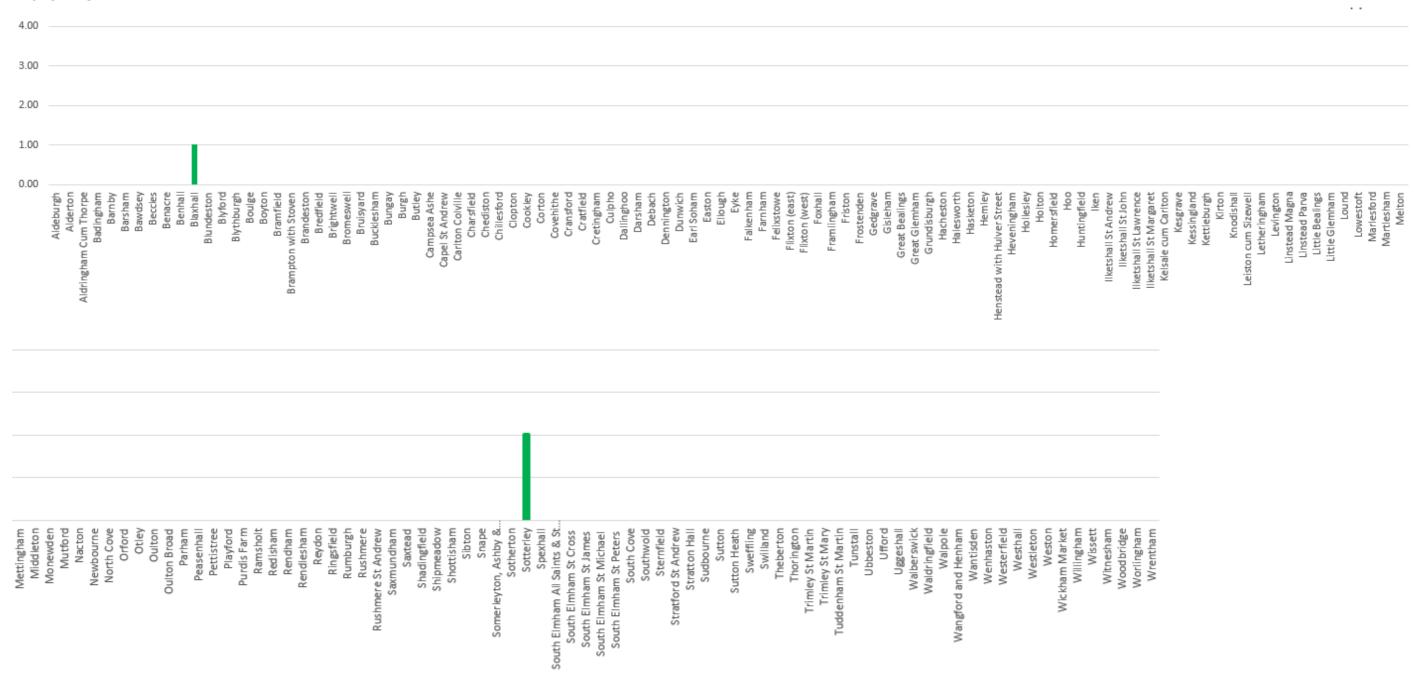


Figure 4: The number of items at Planning Referral Panel with no written comments from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024

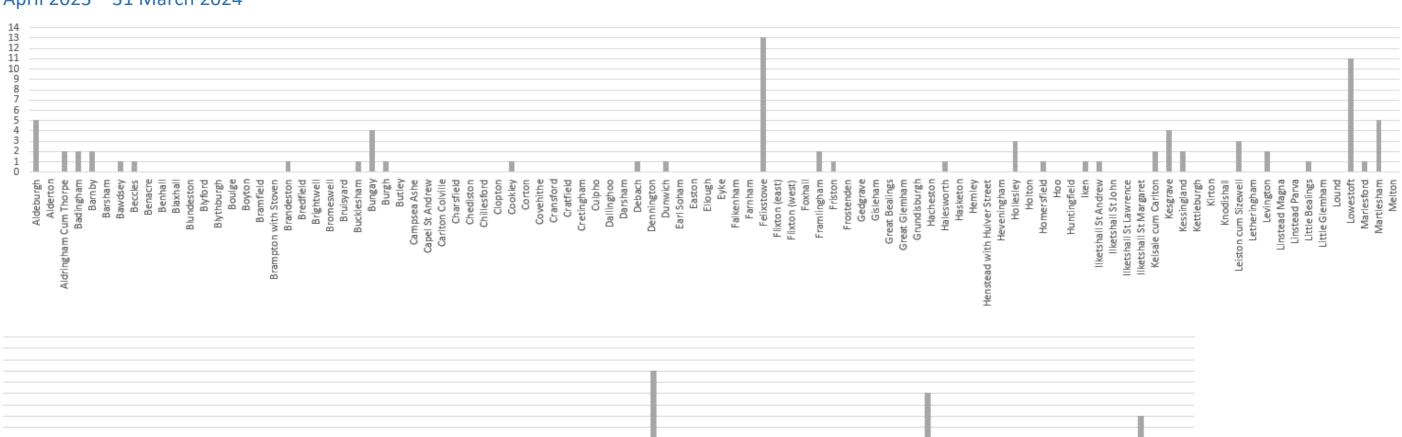


Figure 5: The proportion of items at Planning Referral Panel with or without written comments from relevant Ward Member(s), shown by Town/Parish for the period 1 April 2023 – 31 March 2024

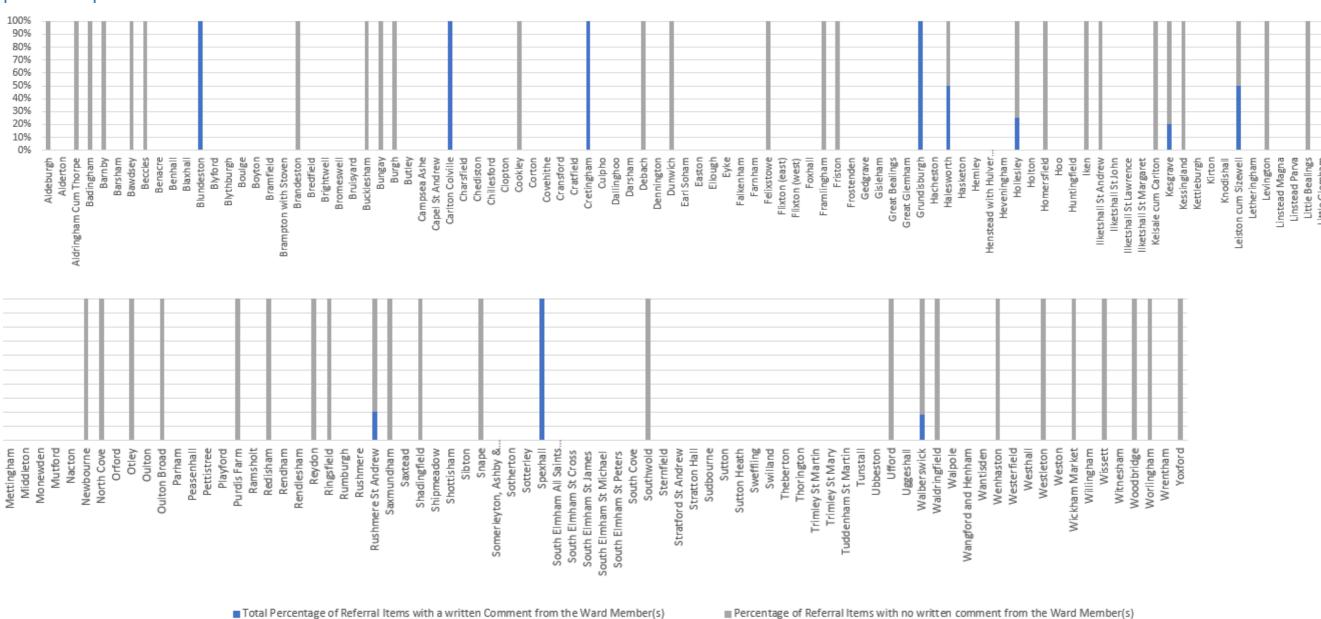




Figure 1: The number of items at each meeting with Objections from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024

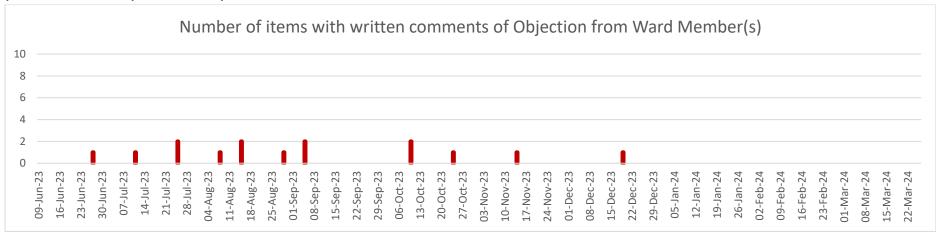


Figure 2: The number of items at each meeting with no Objections/Neutral comments from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024

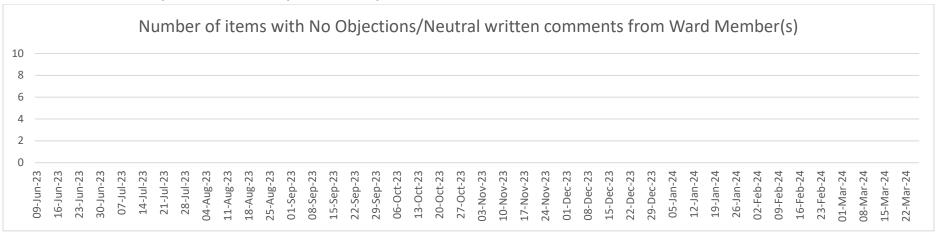


Figure 3: The number of items at each meeting with Support from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024

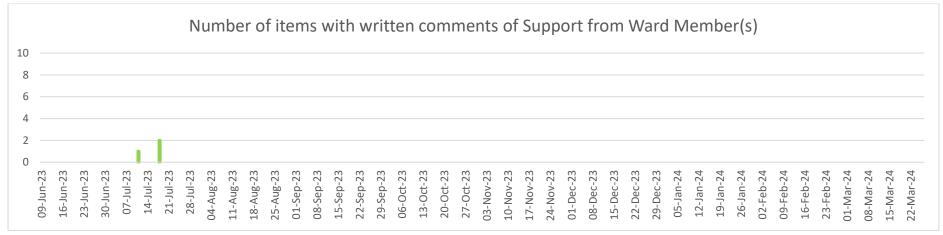


Figure 4: The number of items at each meeting with any form of written comments from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024

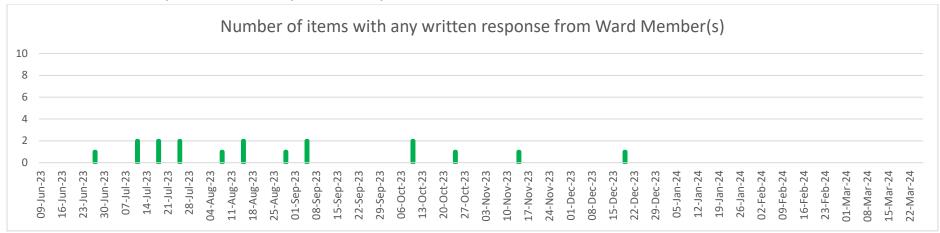


Figure 5: The number of items at each meeting with no written comments from relevant Ward Members, for the period for the period 1 April 2023 – 31 March 2024

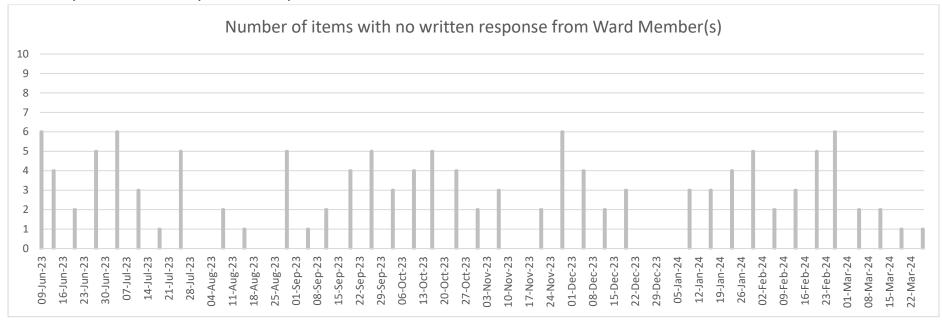


Figure 6: The number of items at Planning Referral Panel with and without any written comments from relevant Ward Member(s) shown by Ward for the period 1 April 2023 – 31 March 2024

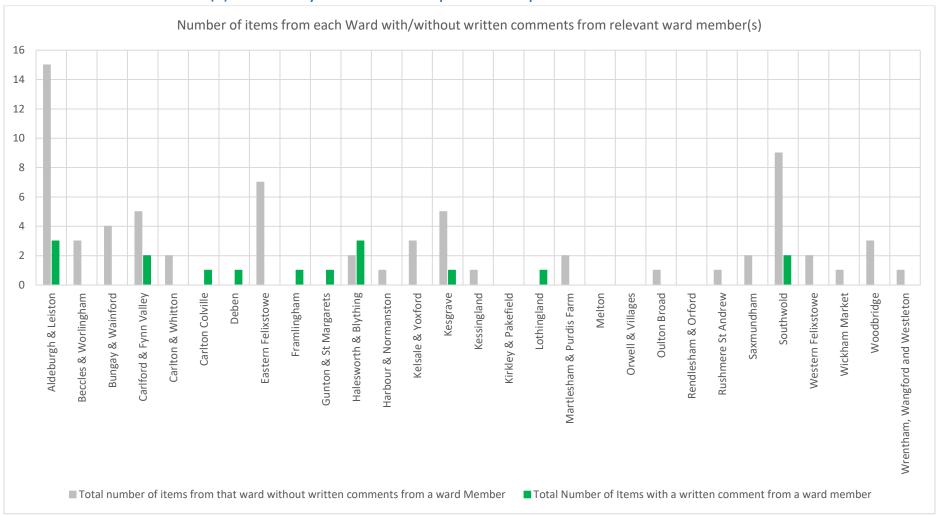


Figure 7: The proportion of items at Planning Referral Panel with and without any written comments from relevant Ward Member(s) shown by Ward for the period 1 April 2023 – 31 March 2024

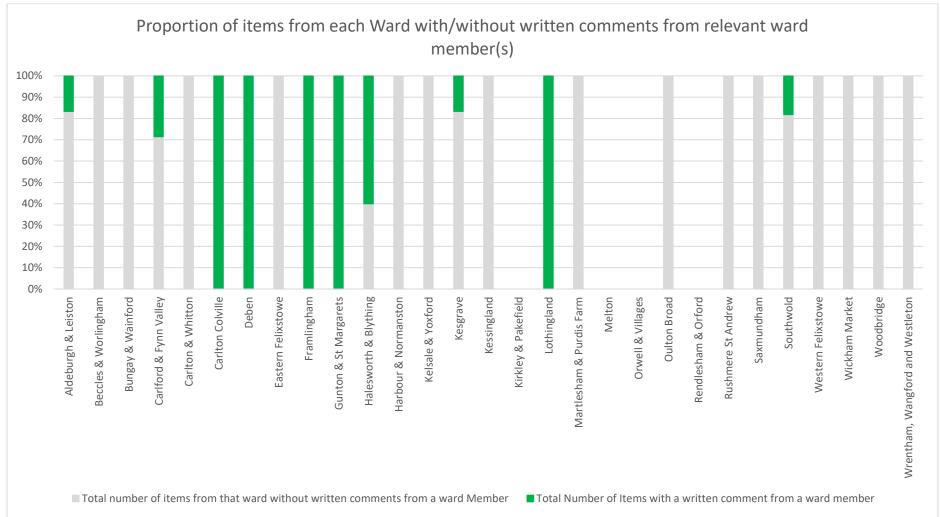


Figure 8: The proportion of items at Planning Referral Panel with/without any written comments from relevant Ward Member(s) for each year since the Panel was introduced

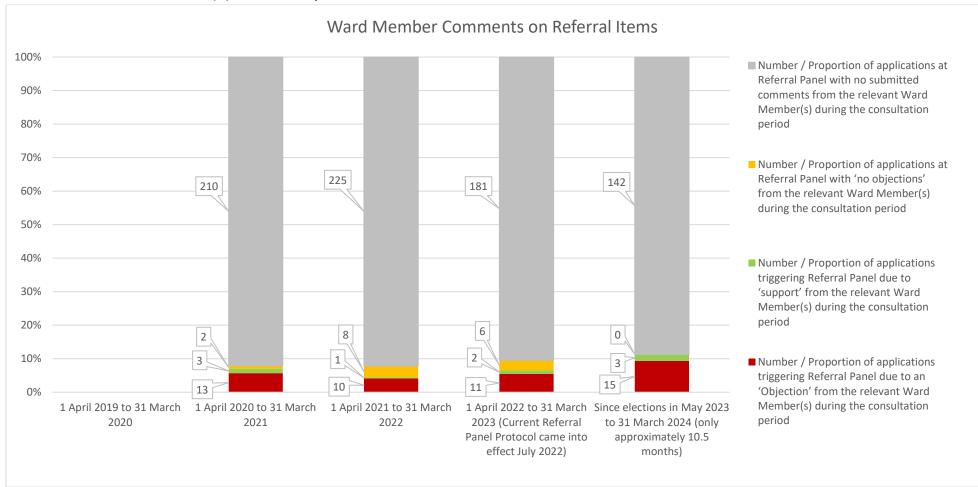




Figure 1: The number of items at Planning Referral Panel with Objections from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

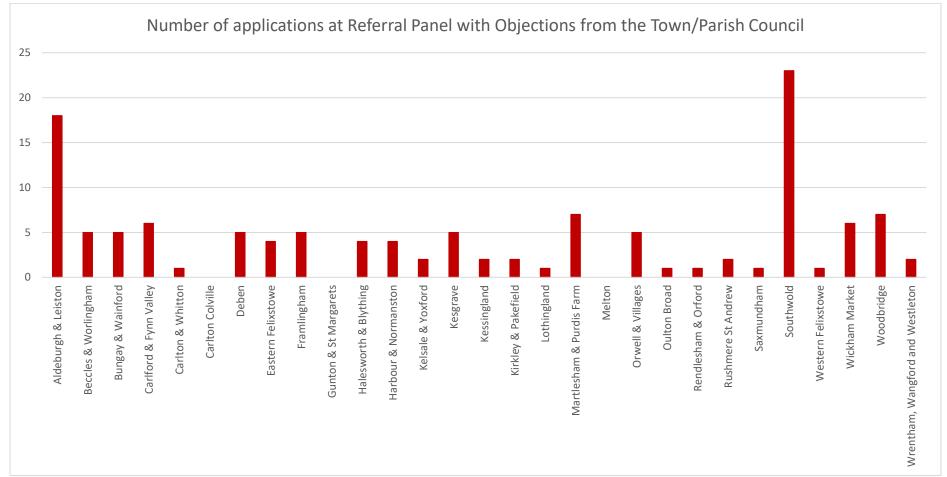


Figure 2: The number of items at Planning Referral Panel with No Objections/neutral comments from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

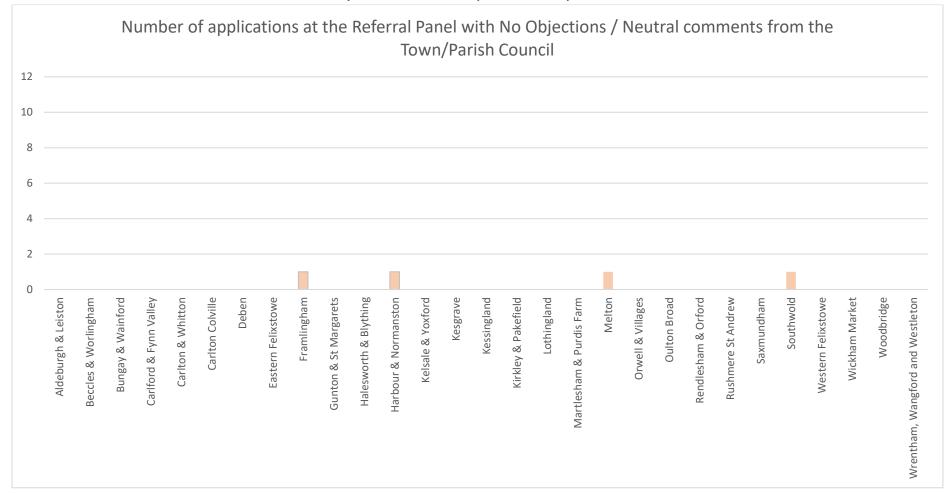


Figure 3: The number of items at Planning Referral Panel with Support from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

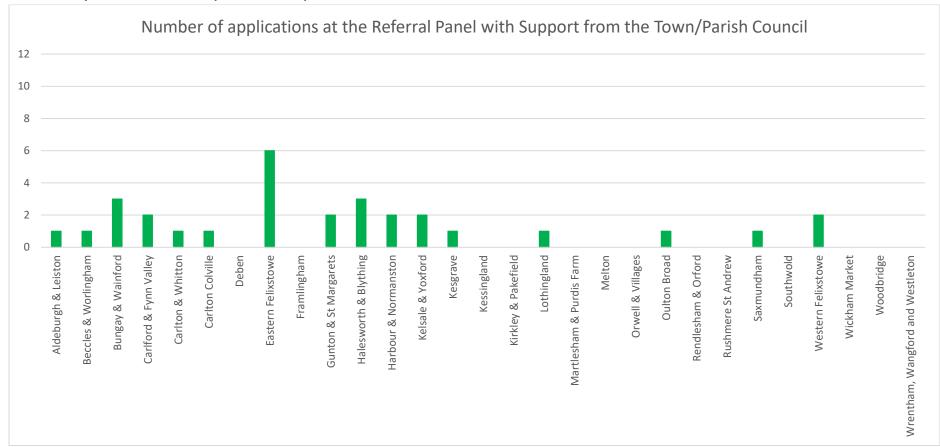


Figure 4: The number of items at Planning Referral Panel with written comments of any type from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

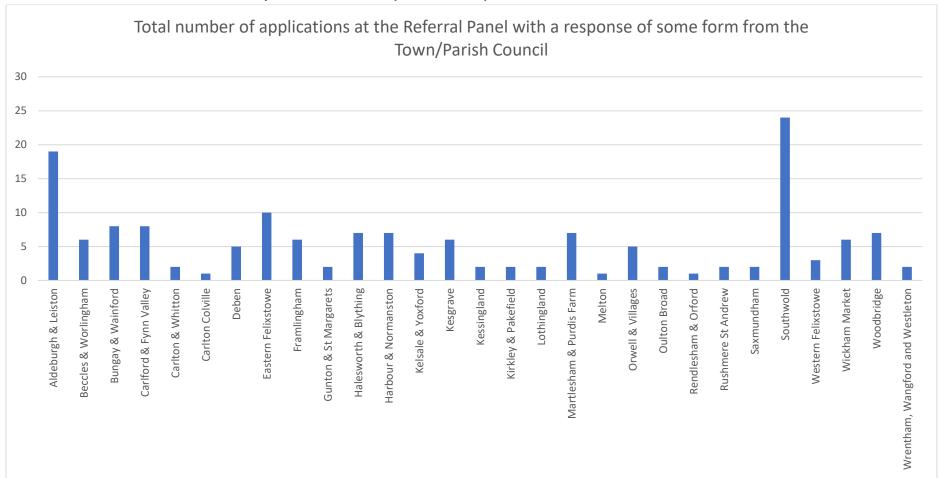


Figure 5: The number of items at Planning Referral Panel without any written comments of any type from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

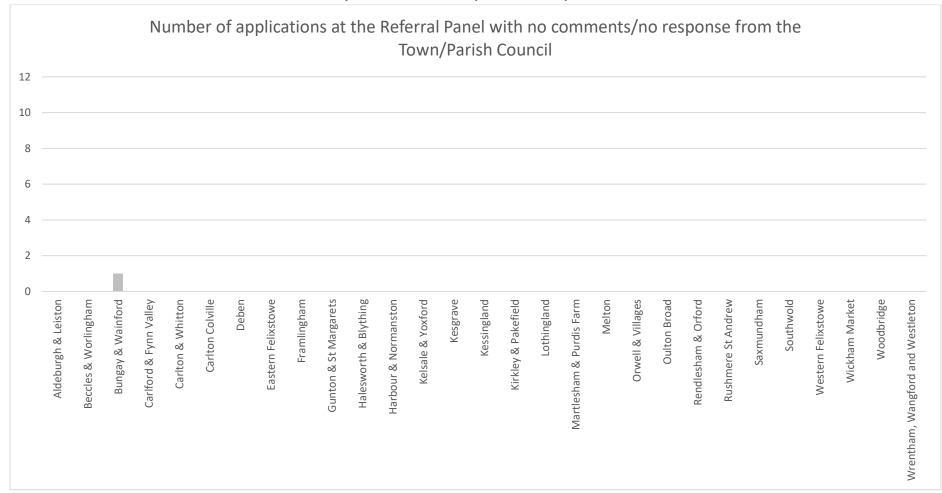


Figure 6: The number of items at Planning Referral Panel with and without any written comments from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

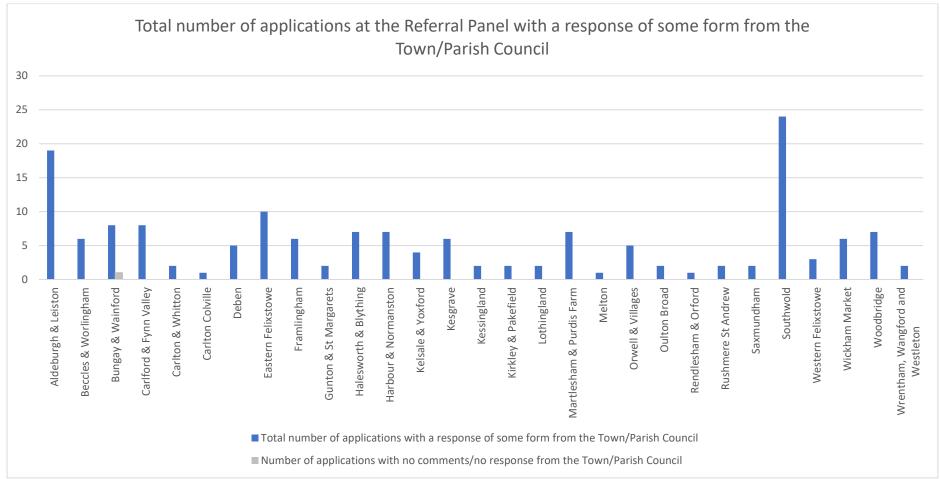


Figure 7: The proportion of items at Planning Referral Panel with and without any written comments from relevant Town/Parish Council shown by Ward for the period 1 April 2023 – 31 March 2024

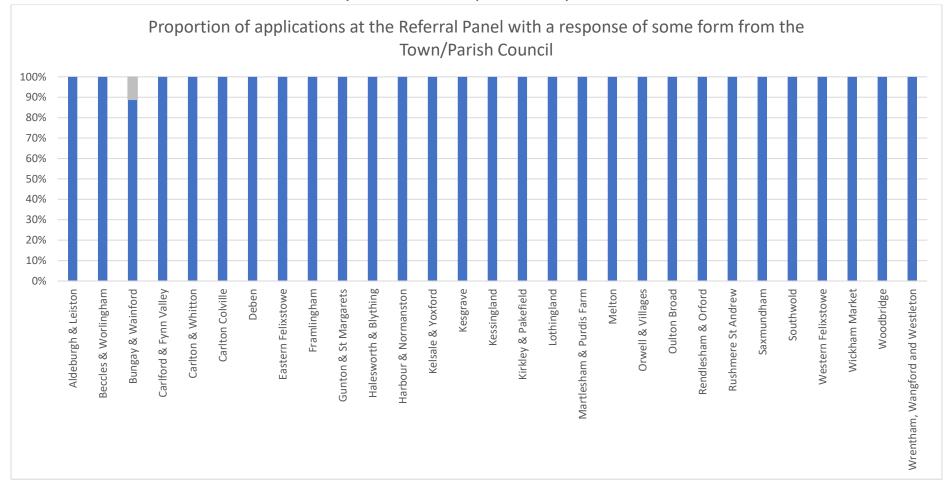
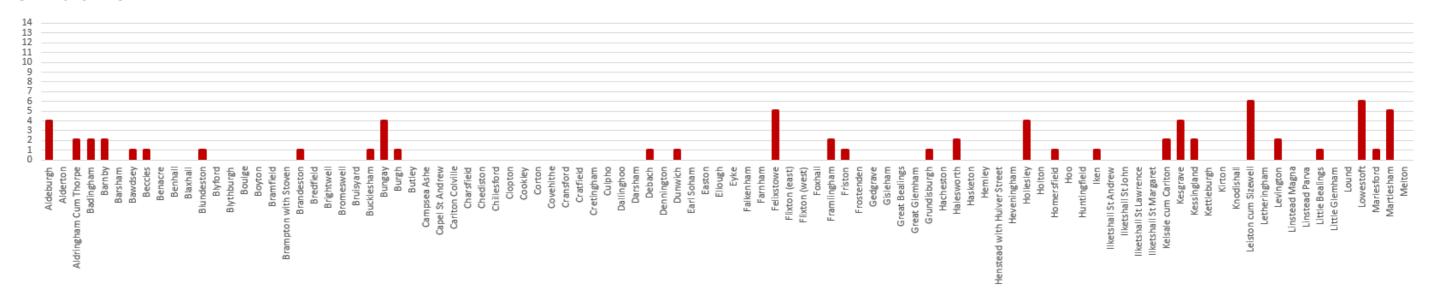




Figure 1: The number of items at Planning Referral Panel with Objections from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024



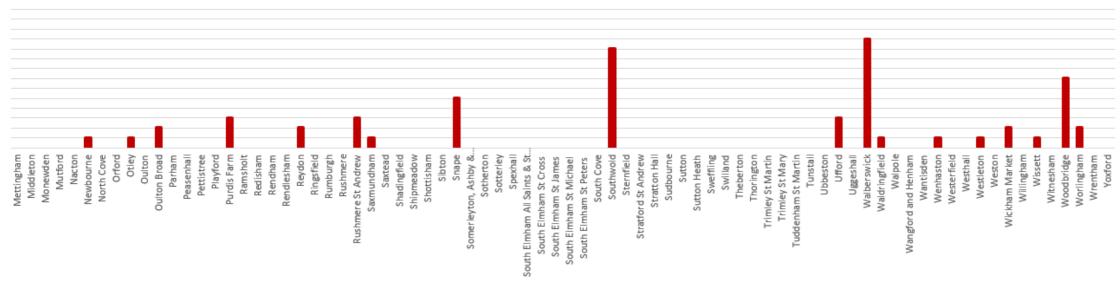


Figure 2: The number of items at Planning Referral Panel with No Objections/neutral comments from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024

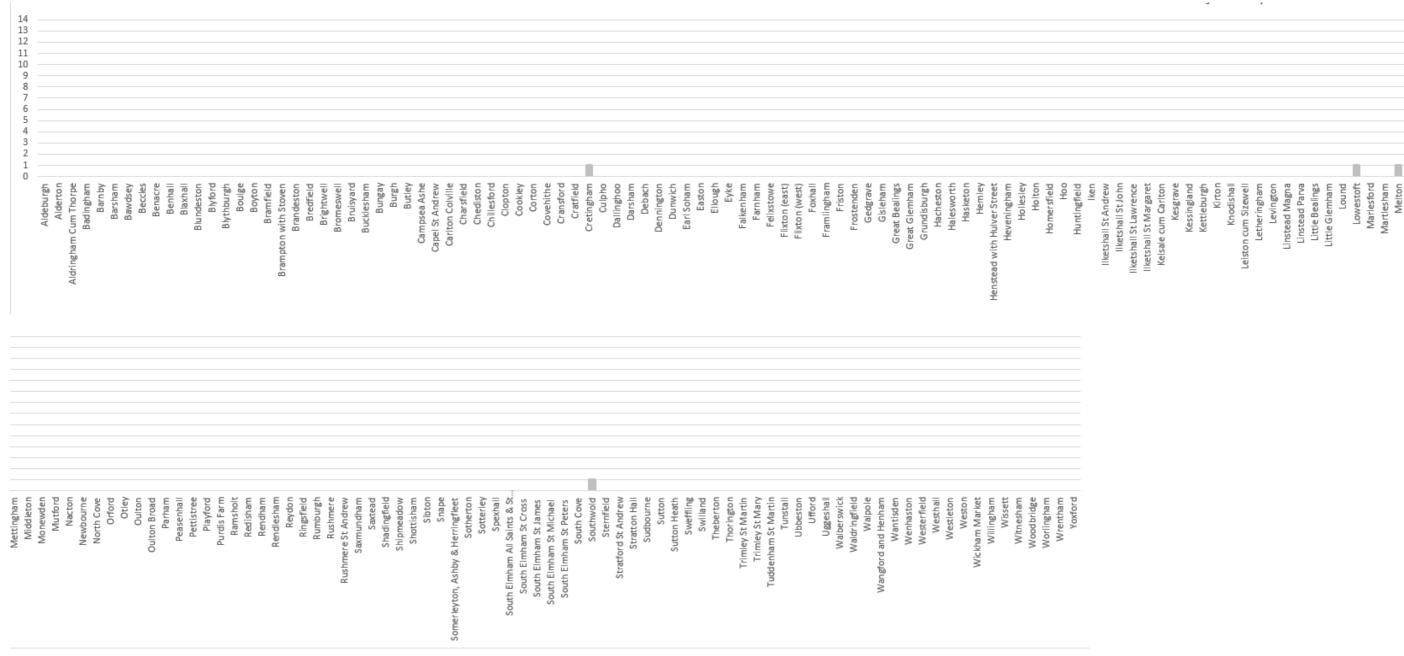


Figure 3: The number of items at Planning Referral Panel with Support from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024

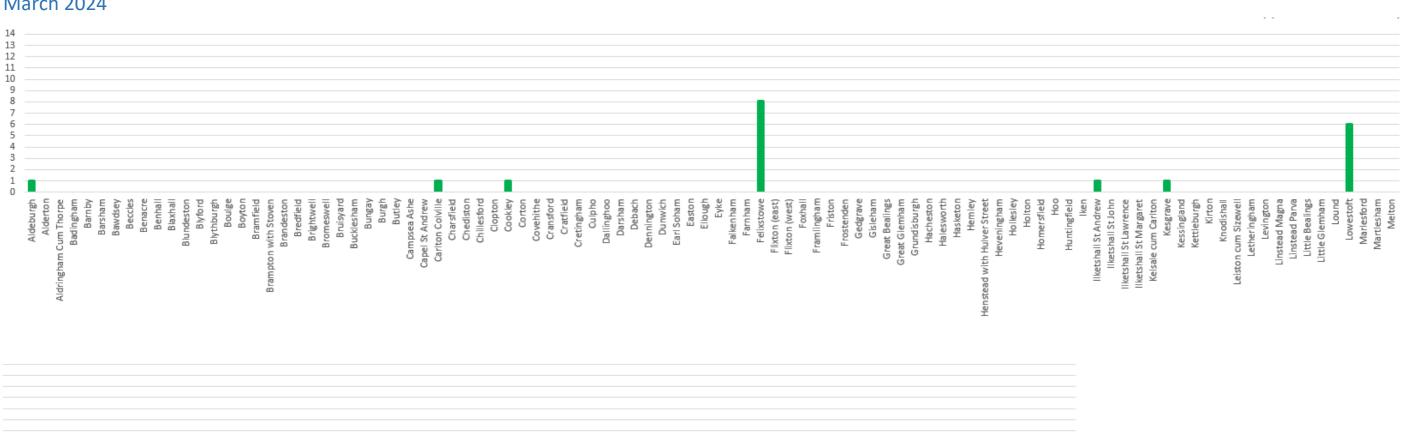
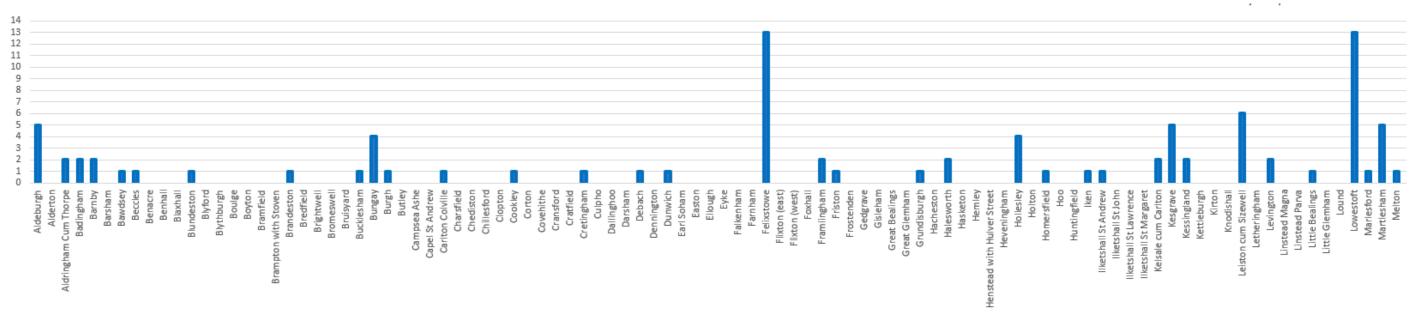


Figure 4: The number of items at Planning Referral Panel with written comments of any type from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024



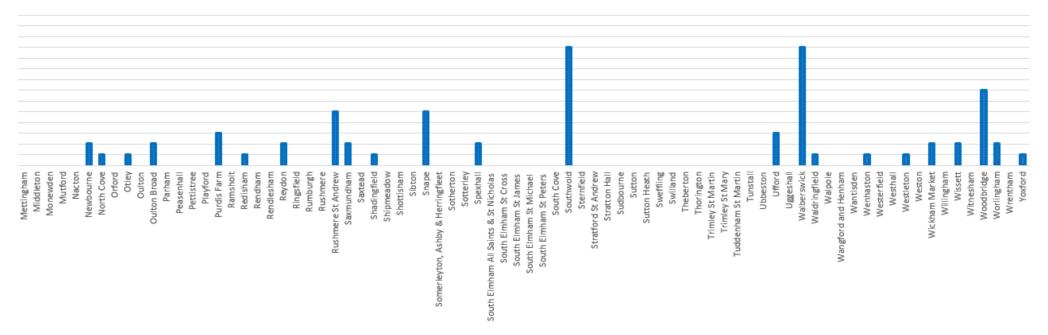


Figure 5: The number of items at Planning Referral Panel without any written comments of any type from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024

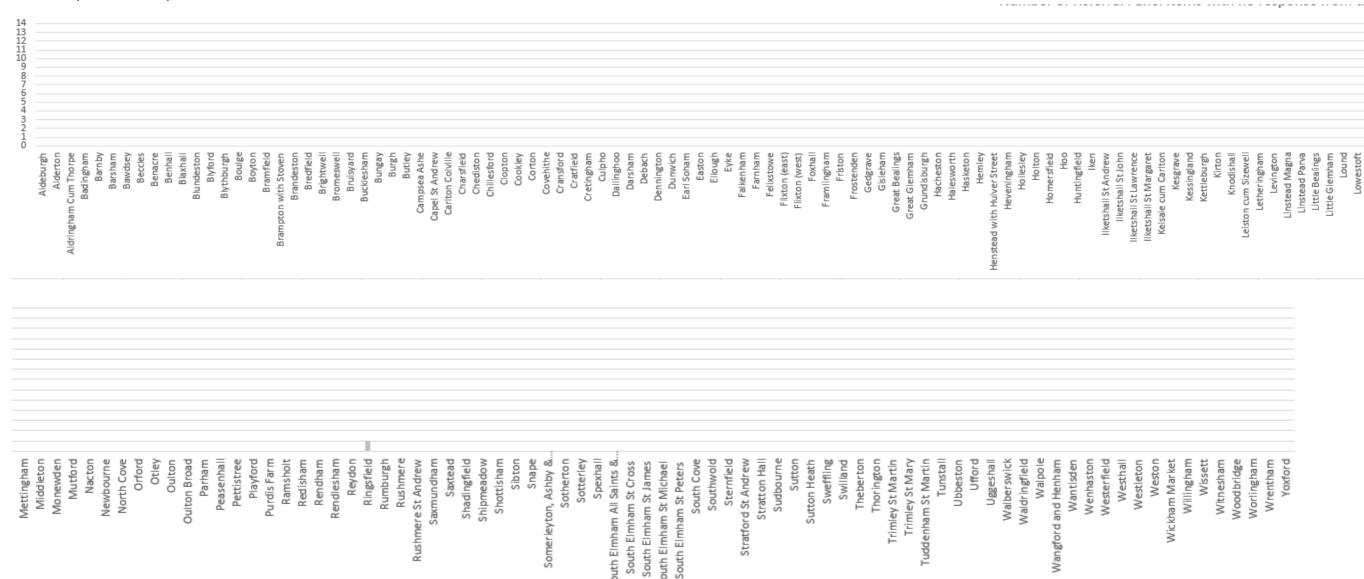


Figure 6: The number of items at Planning Referral Panel with and without any written comments from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024

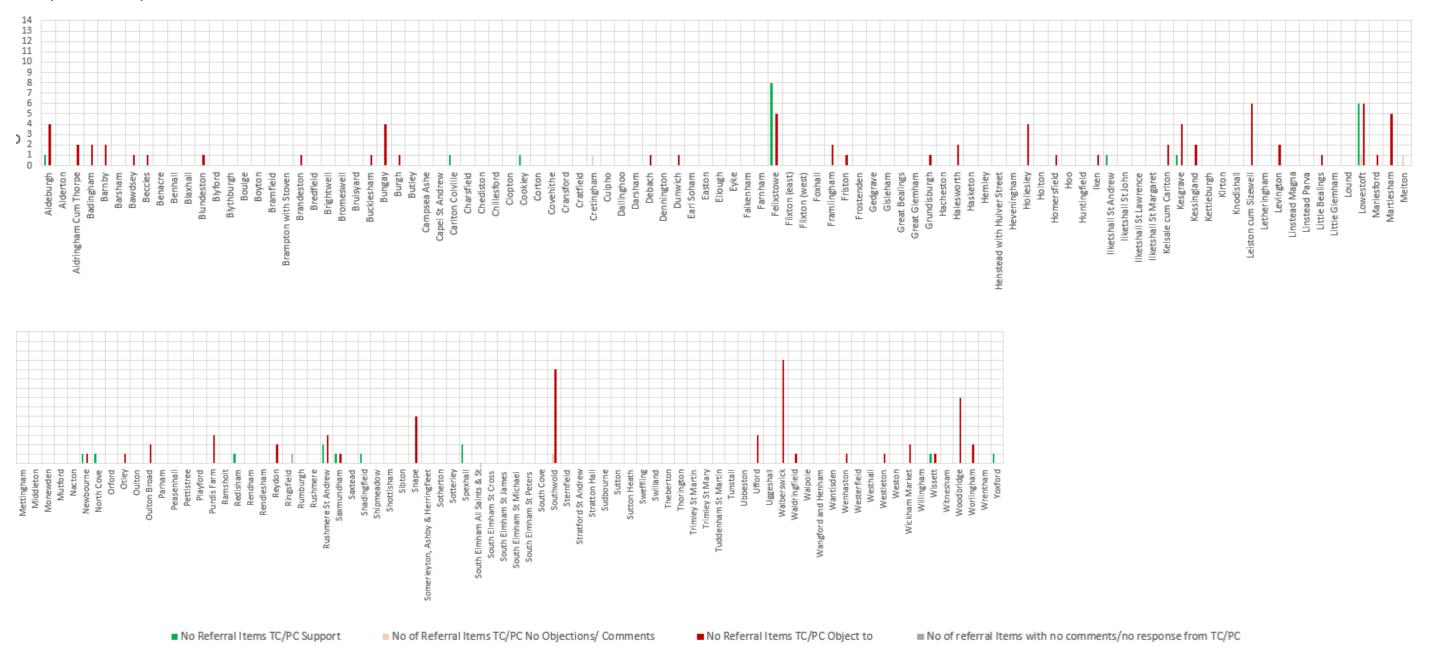


Figure 7: The proportion of items at Planning Referral Panel with and without any written comments from relevant Town/Parish Council shown by Town/Parish for the period 1 April 2023 – 31 March 2024

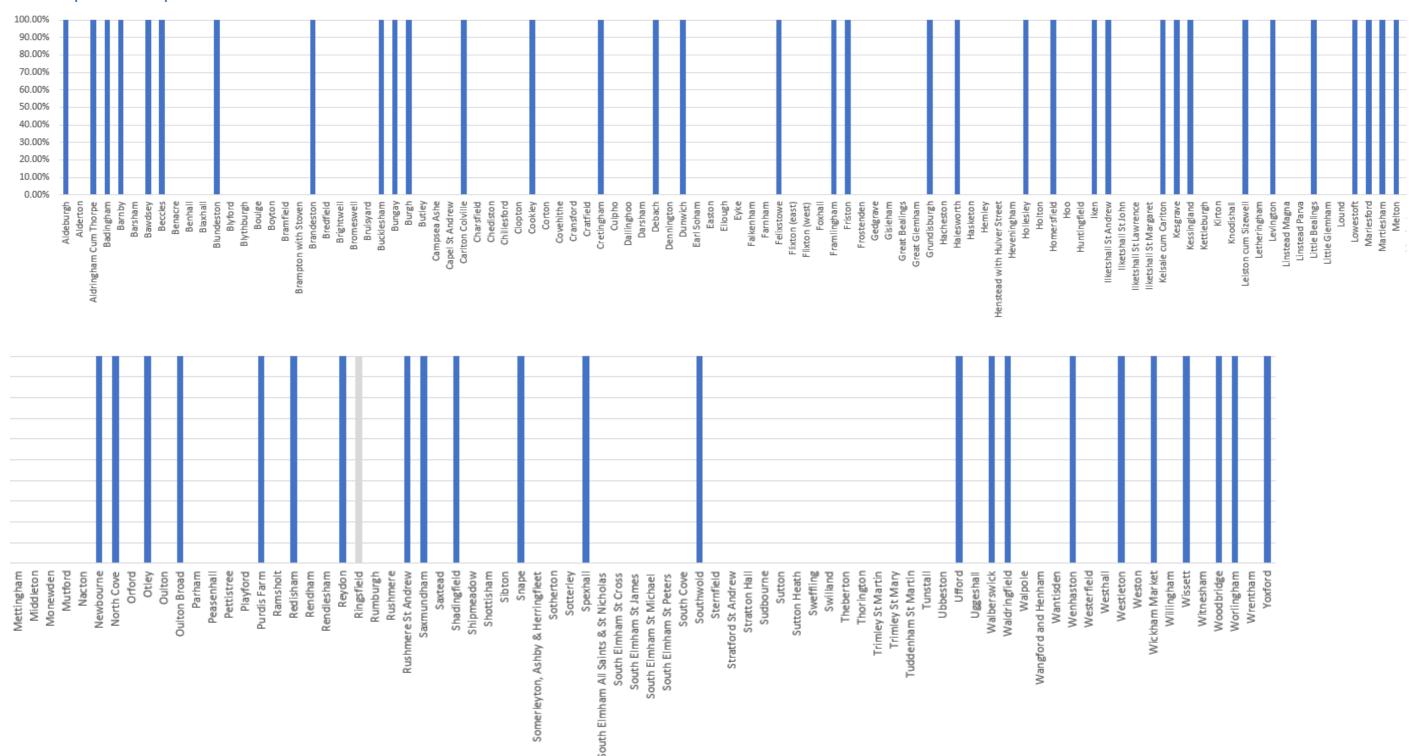




Figure 1: The number of items at each meeting with Objections from relevant Town/Parish Council, for the period for the period 1 April 2023 – 31 March 2024

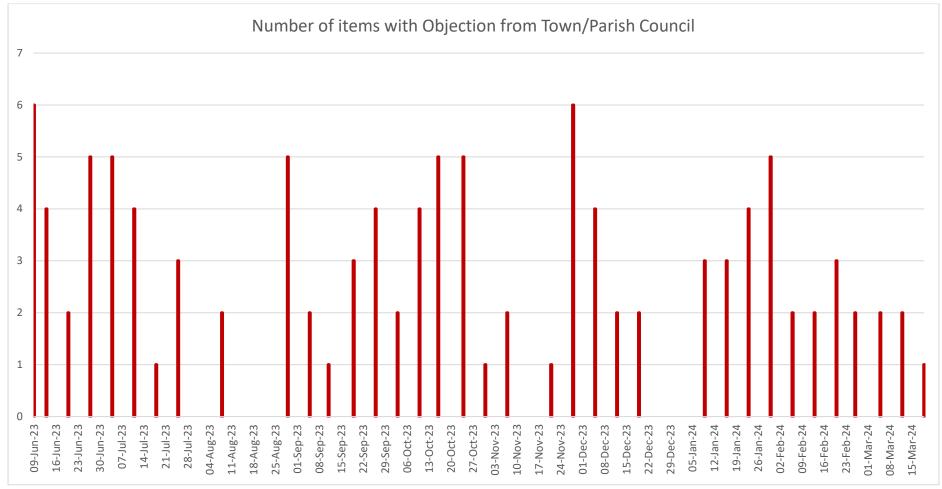


Figure 2: The number of items at each meeting with no Objections/Neutral comments from relevant Town/Parish Council, for the period for the period 1 April 2023 – 31 March 2024

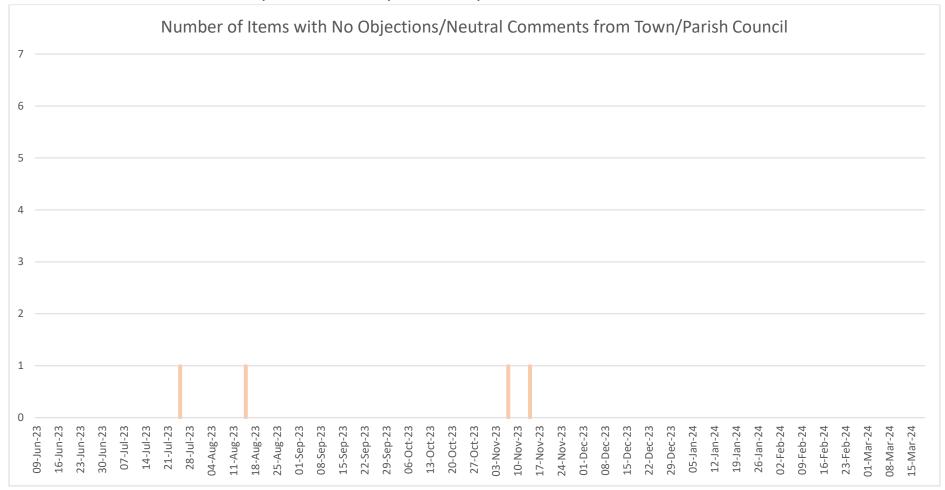


Figure 3: The number of items at each meeting with Support from relevant Town/Parish Council, for the period for the period 1 April 2023 – 31 March 2024

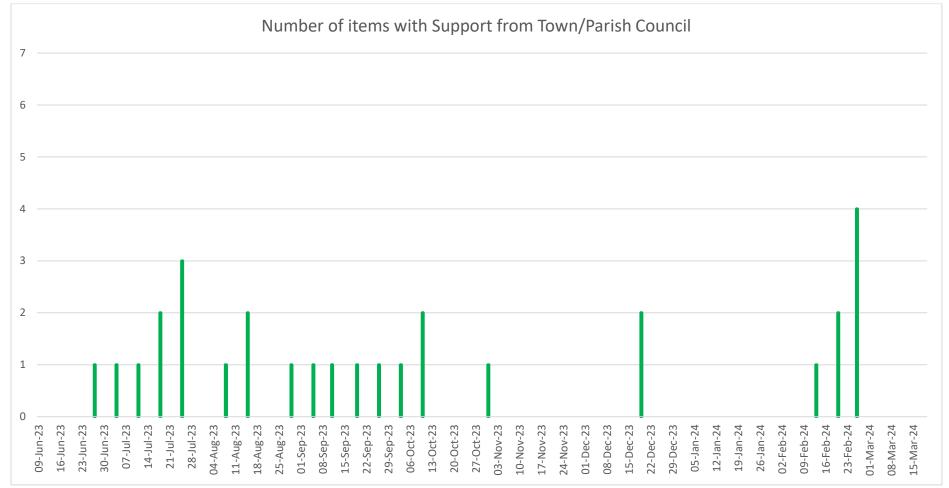


Figure 4: The number of items at each meeting with any form of written comments from relevant Town/Parish Council,, for the period for the period 1 April 2023 – 31 March 2024

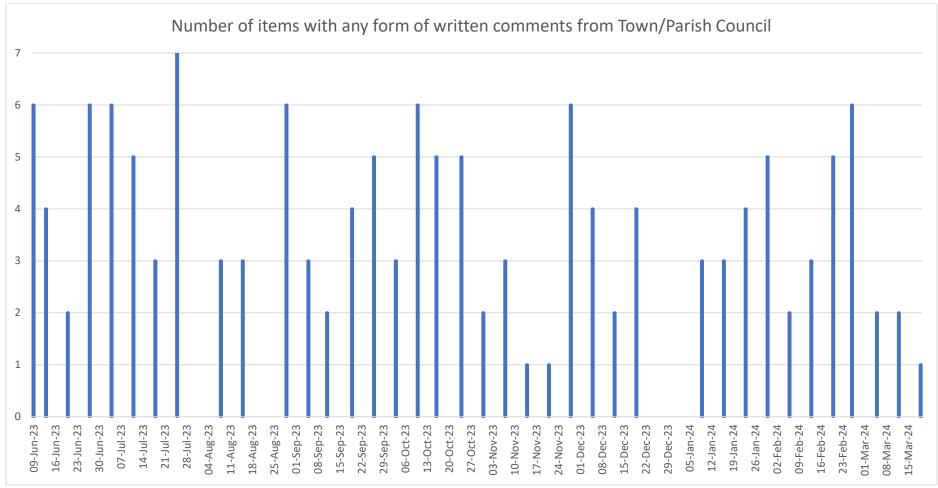


Figure 5: The proportion of items at Planning Referral Panel with/without any written comments from relevant Town/Parish Council for each year since the Panel was introduced

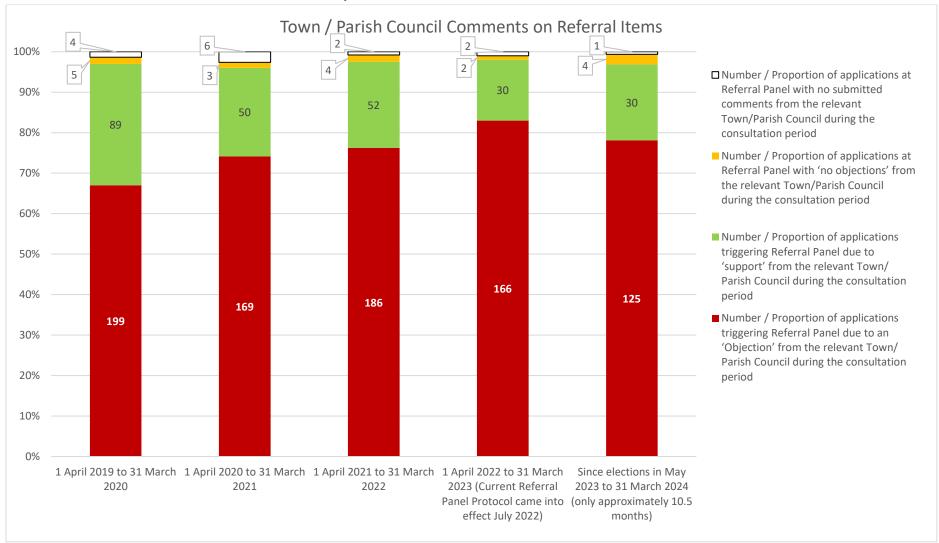






Figure 1: Pie Chart showing the proportion of each type of written comment (or no written comment) received from relevant Ward Member(s) on items at the Planning Referral Panel for the period 1 April 2023 – 31 March 2024

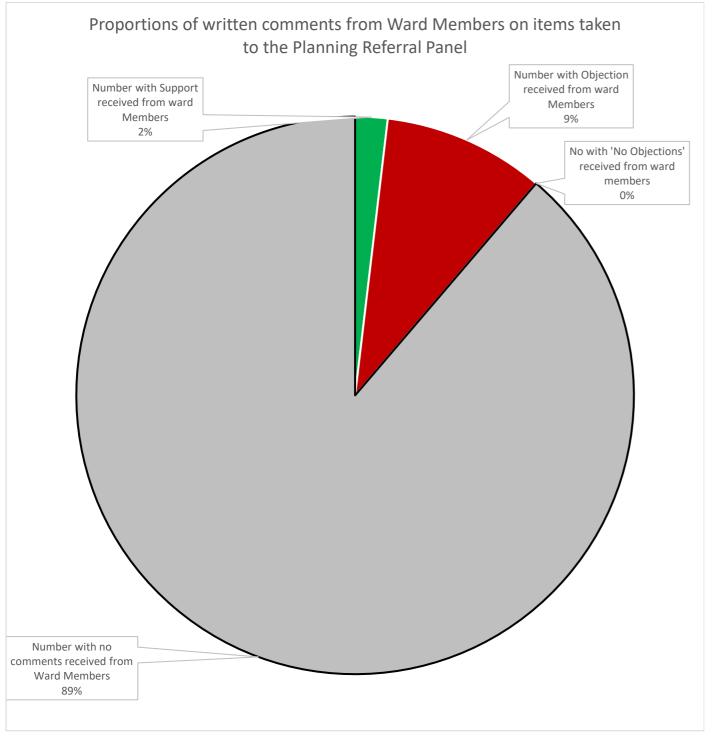


Figure 2: Pie Chart showing the proportion of each type of written comment (or no written comment) received from Town/Parish Councils on items at the Planning Referral Panel for the period 1 April 2023 – 31 March 2024

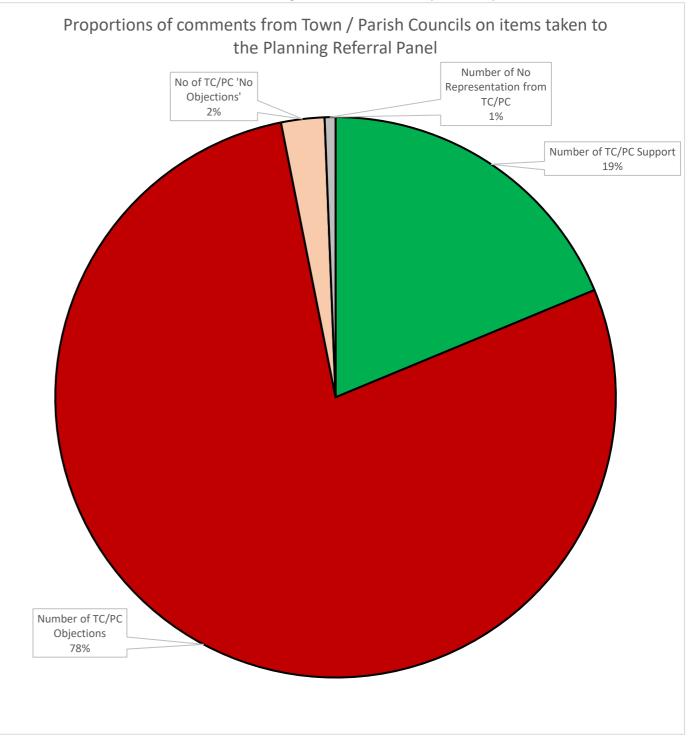


Figure 3: Number of applications at the Planning Referral Panel with any comments from the Town/Parish Council and number with any comments from relevant Ward Member(s) for the period 1 April 2023 – 31 March 2024, shown by Ward

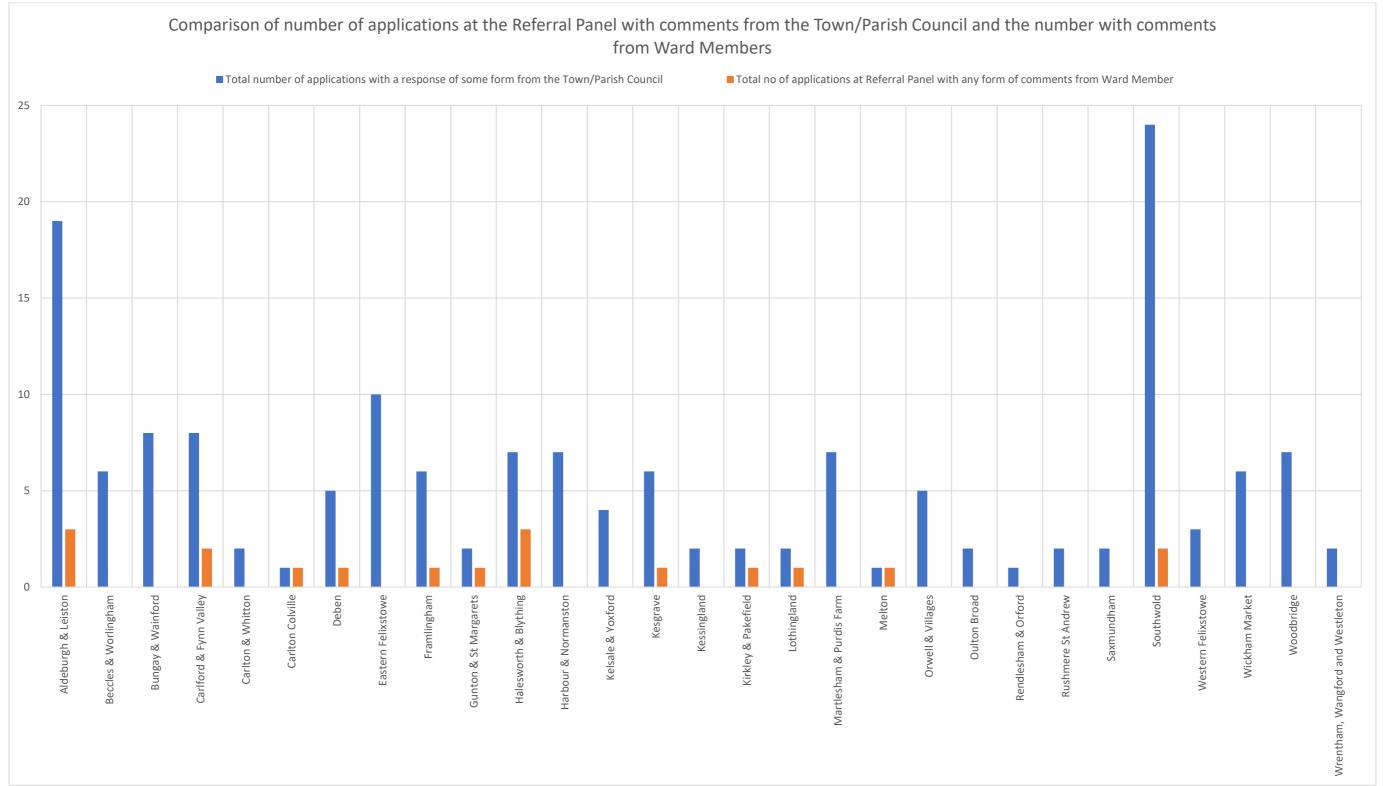


Figure 4: Number of applications at the Planning Referral Panel with Objection from the Town/Parish Council and Objections from relevant Ward Members for the period 1 April 2023 – 31 March 2024, shown by Parish

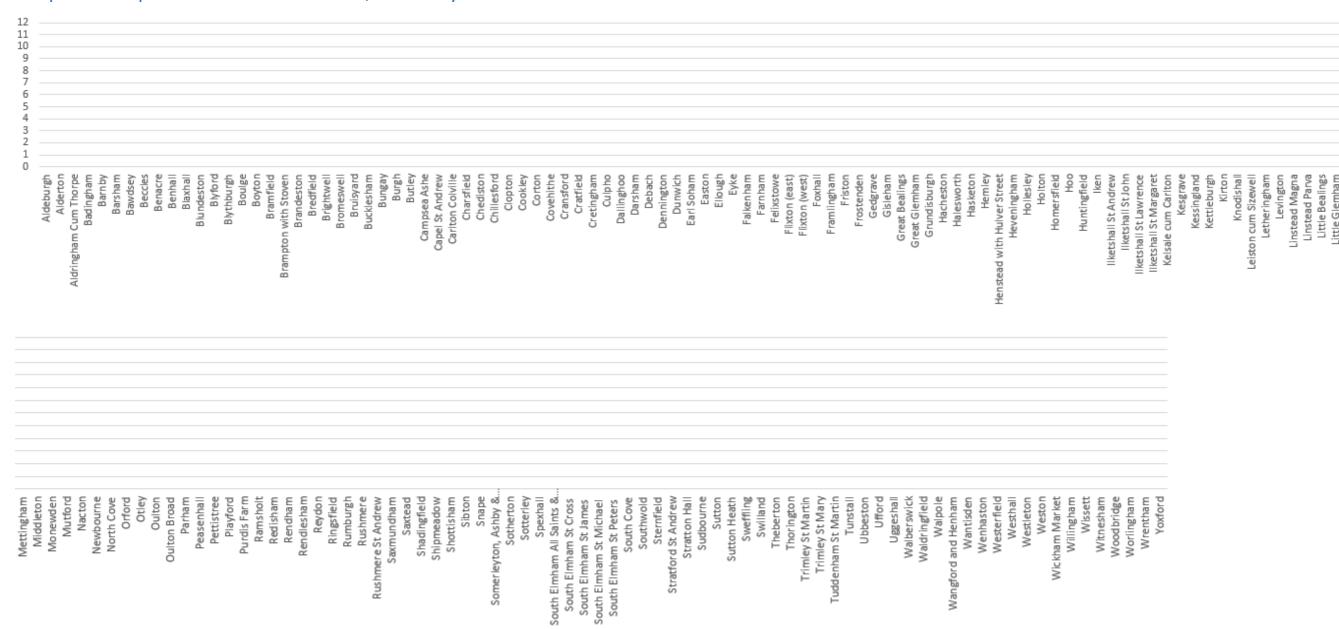
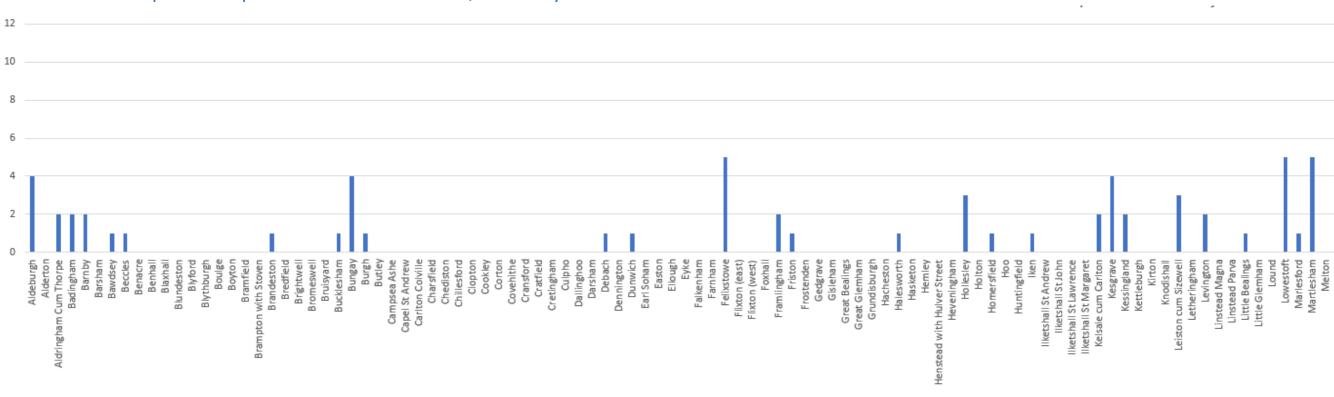
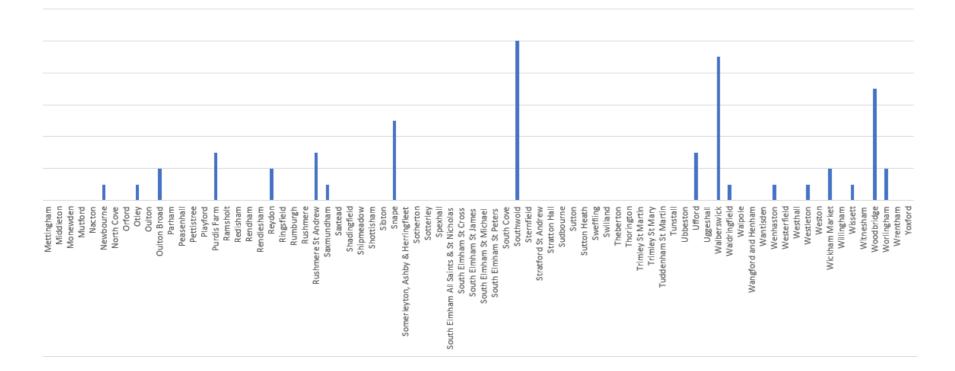


Figure 5: Number of applications at the Planning Referral Panel with Objection from the Town/Parish Council and no written comments from relevant Ward Members for the period 1 April 2023 – 31 March 2024, shown by Parish

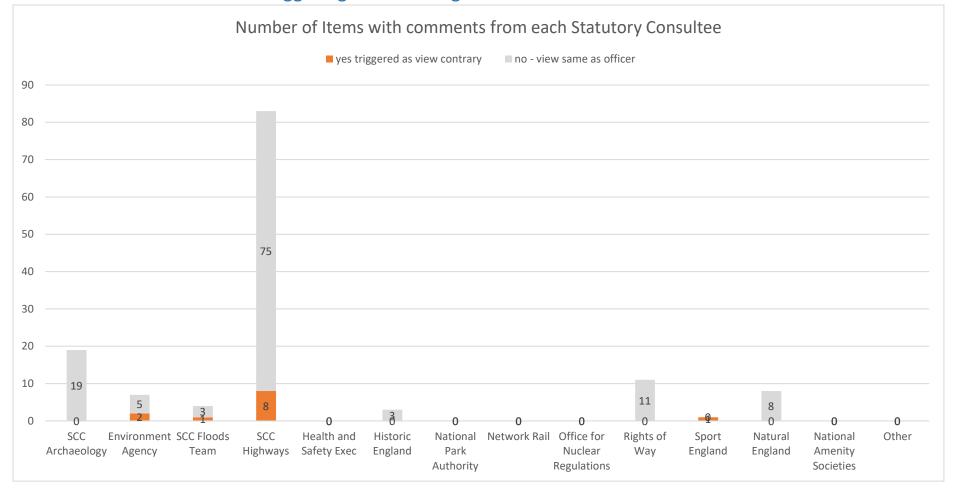






Appendix O: The number and proportion of items at Planning Referral Panel meetings with or without comments from the Statutory Consultees for the period 1 April 2023 – 31 March 2024

Figure 1: Number of items at the panel with comments received from each of the main statutory consultees and the numbers triggering the Planning Referral Process

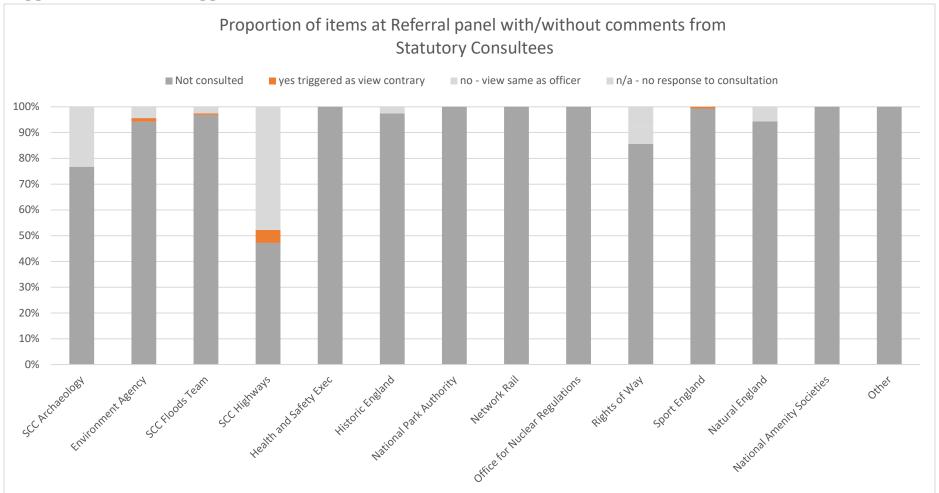


Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024

108 | Page

Appendix O: The number and proportion of items at Planning Referral Panel meetings with or without comments from the Statutory Consultees for the period 1 April 2023 – 31 March 2024

Figure 2: Proportion of Items at Referral Panel with comments the main Statutory Consultees where they triggered or did not trigger the Referral Panel Process



Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024

109 | Page

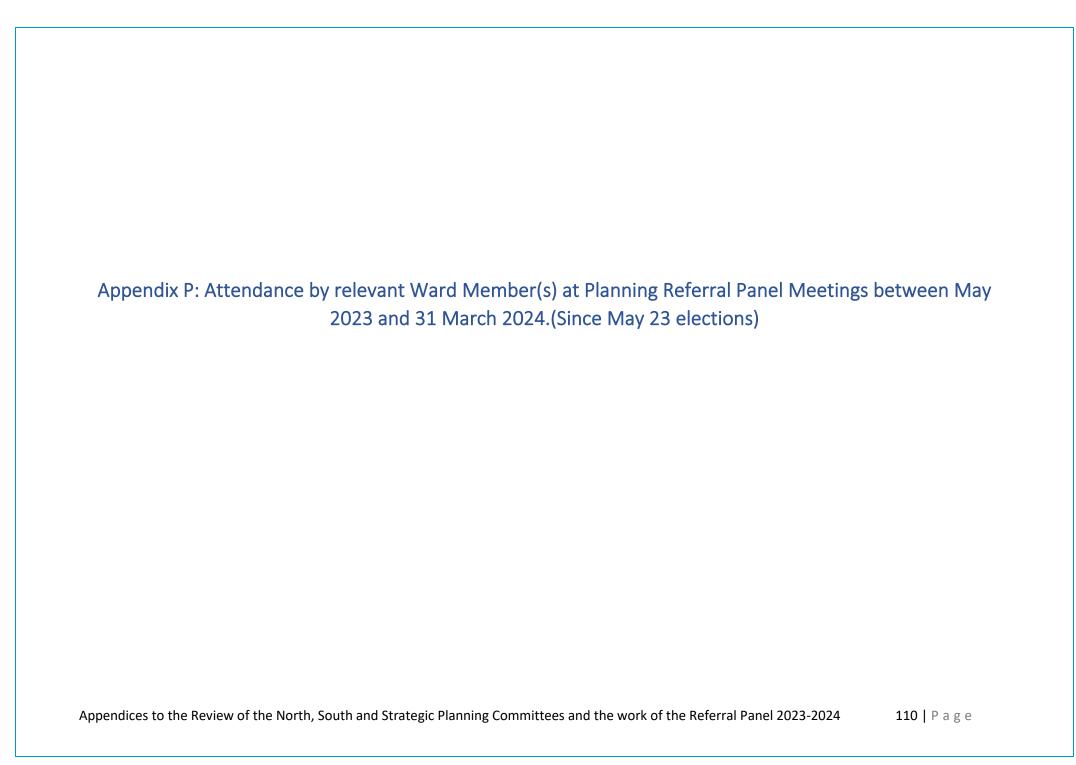


Figure 1: Pie Chart showing the proportion of Planning Referral Panel Meetings where the members other than the Planning Referral Panel Members attended .(Since May 23 elections)

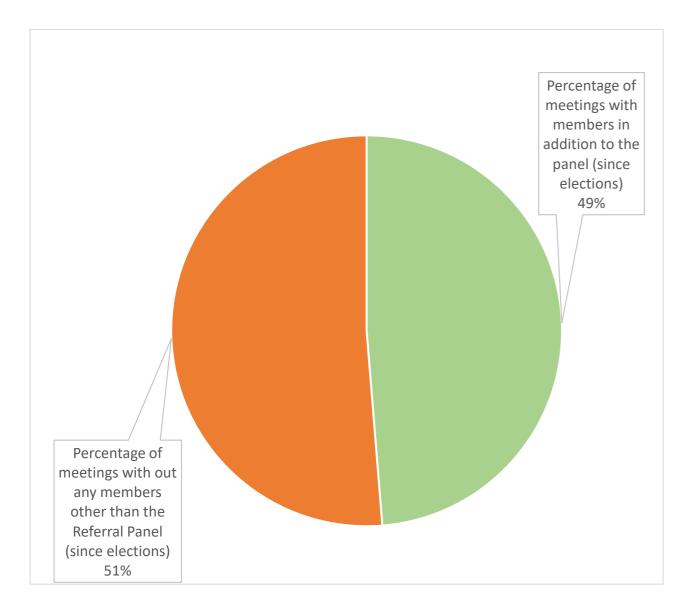


Figure 2: Pie Chart showing the percentage of ward members who attended at least one Planning Referral Panel meeting or did not attend any Planning Referral Panels between 9 June 2023 and 31 March 2024 .(Since May 23 elections)

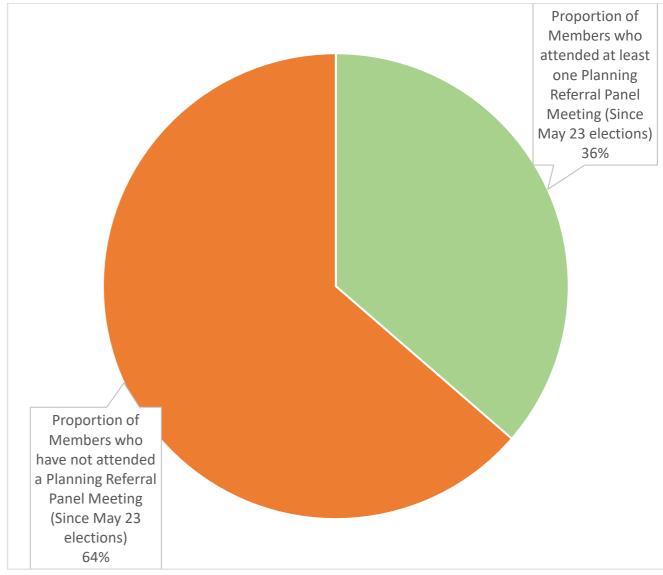


Figure 3: Number of Planning Referral meetings each Ward Member attended between May 2023 and 31 March 2024. (Since May 23 elections)

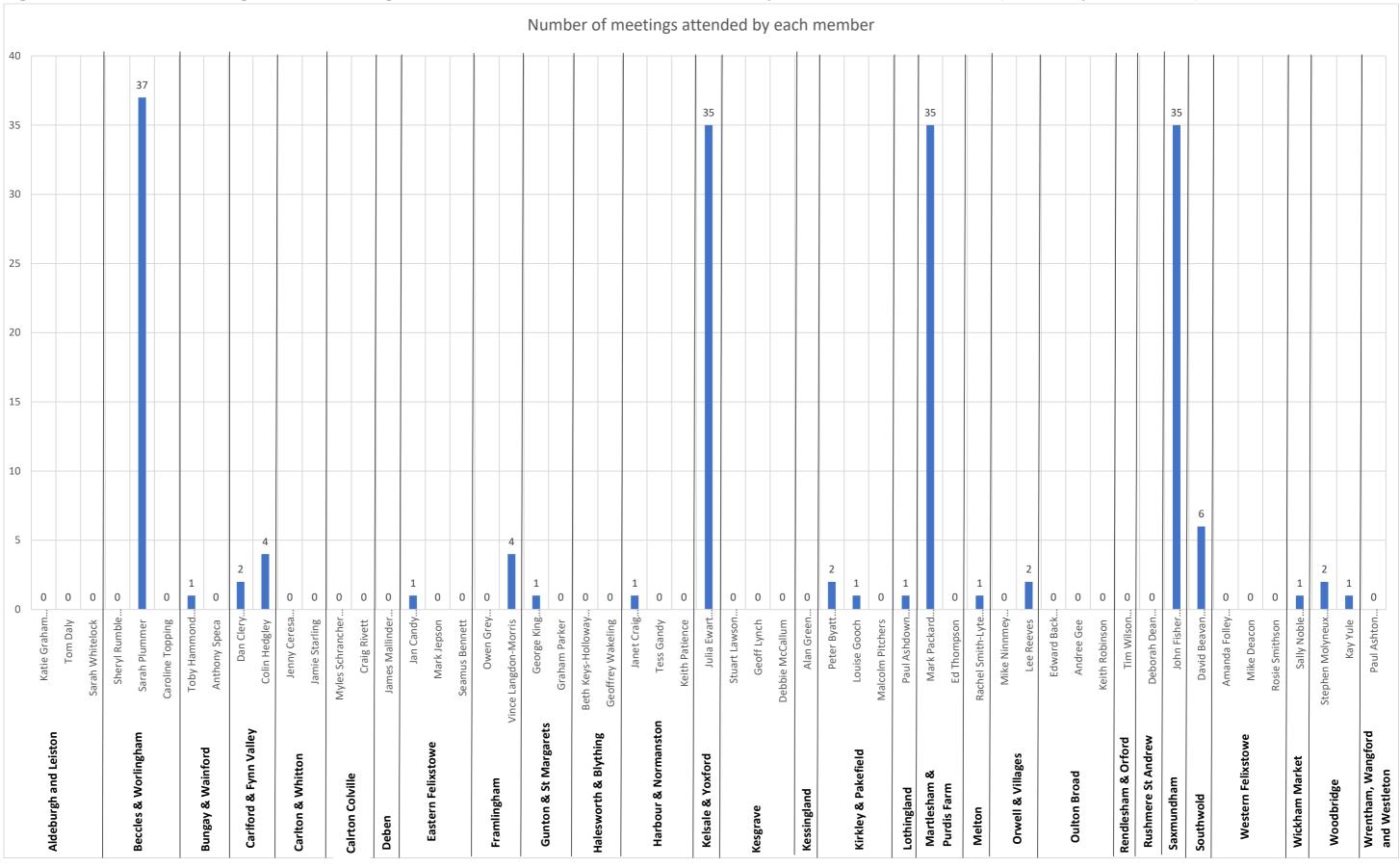


Figure 4: Percentage of Planning Referral Panel Meetings attended by each member between May 2023 and 31 March 2024 (Since May 23 elections) ■ Percentage of meetings attended ■ Percentage of meetings not attended 90% 80% 70% 60% 50% 40% 30% 20% 10% Owen Grey Tom Daly Dan Clery James Mallinder Seamus Bennett George King Mark Packard Rachel Smith-Lyte David Beavan Stephen Molyneux Sarah Whitelock Sheryl Rumble Sarah Plummer Caroline Topping Anthony Speca Colin Hedgley Jenny Ceresa Jamie Starling Myles Schrancher **Craig Rivett** Jan Candy Mark Jepson **Graham Parker** eth Keys-Holloway **Geoffrey Wakeling** Janet Craig Tess Gandy Stuart Lawson Geoff Lynch Debbie McCallum Alan Green Peter Byatt Louise Gooch Andree Gee Keith Robinson Tim Wilson Amanda Folley Paul Ashton Katie Graham Keith Patience Mike Ninnmey Mike Deacon Malcolm Pitchers Harbour & <u>Nocmanston</u> Gunton & St Margarets Wrentham, Wangford and Westleton Cattford & Fynn Valley Aldeburgh and Leiston Beccles & Worlingham Halesworth & Blything Western Felixstowe Rendlesham & Orford Rushmere St Andrew Eastern Felixstowe Bungay & Wajinford Kirkley & <u>Paketield</u> Kelsale & Xxxford Carlton & Whitton Orwell & Villages Wickham Market Martlesham & **Oulton Broad Calcton** colville Saxmundham Framlingham Woodbridge **Pyrdis Farm** Kessingland Southwold Kesgrave Melton Deben

113 | Page

Figure 5: Number of times where the relevant ward member(s) were present for an item in their ward (Since May 23 elections)

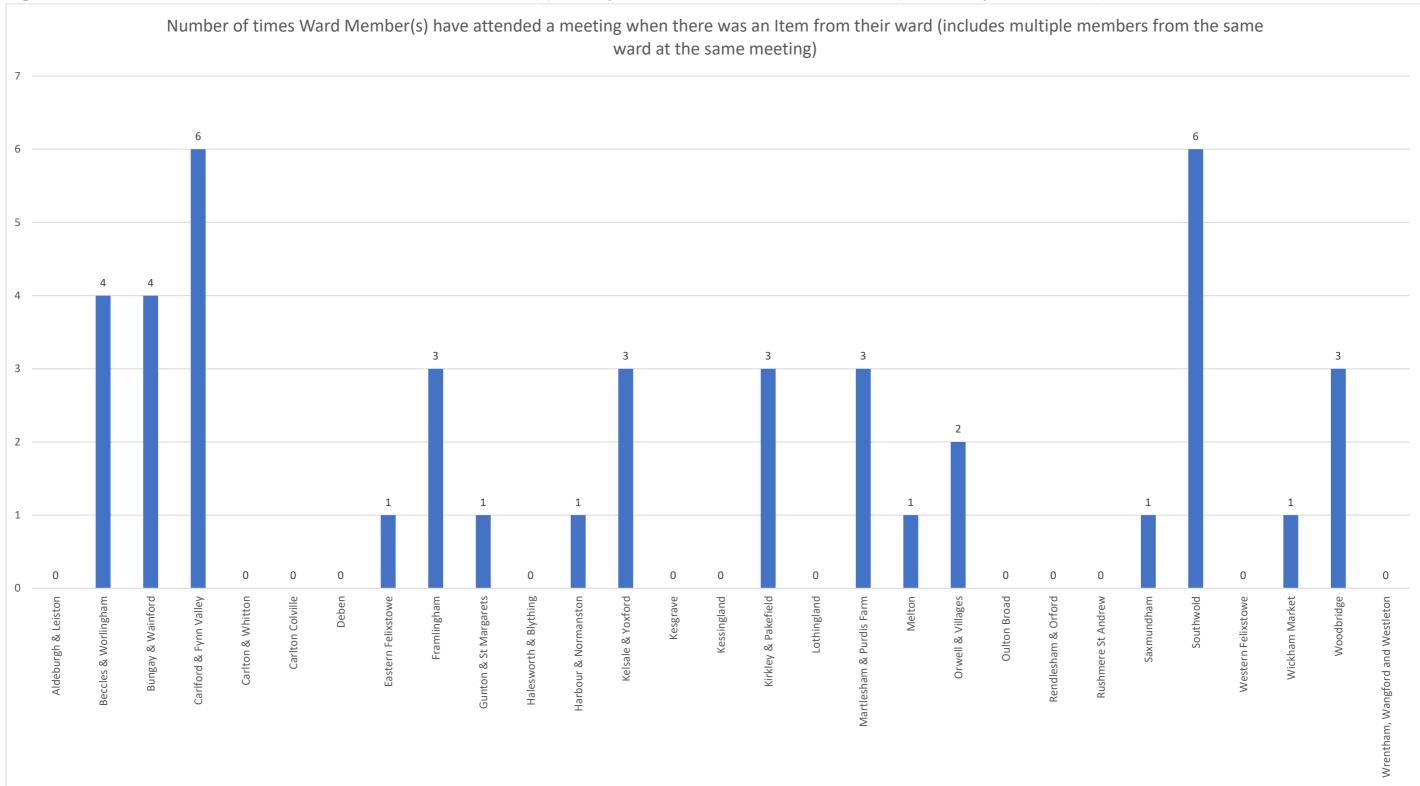


Figure 6: Proportion of meetings attended by each Ward Member where there was an item in their Ward (Since May 23 elections)

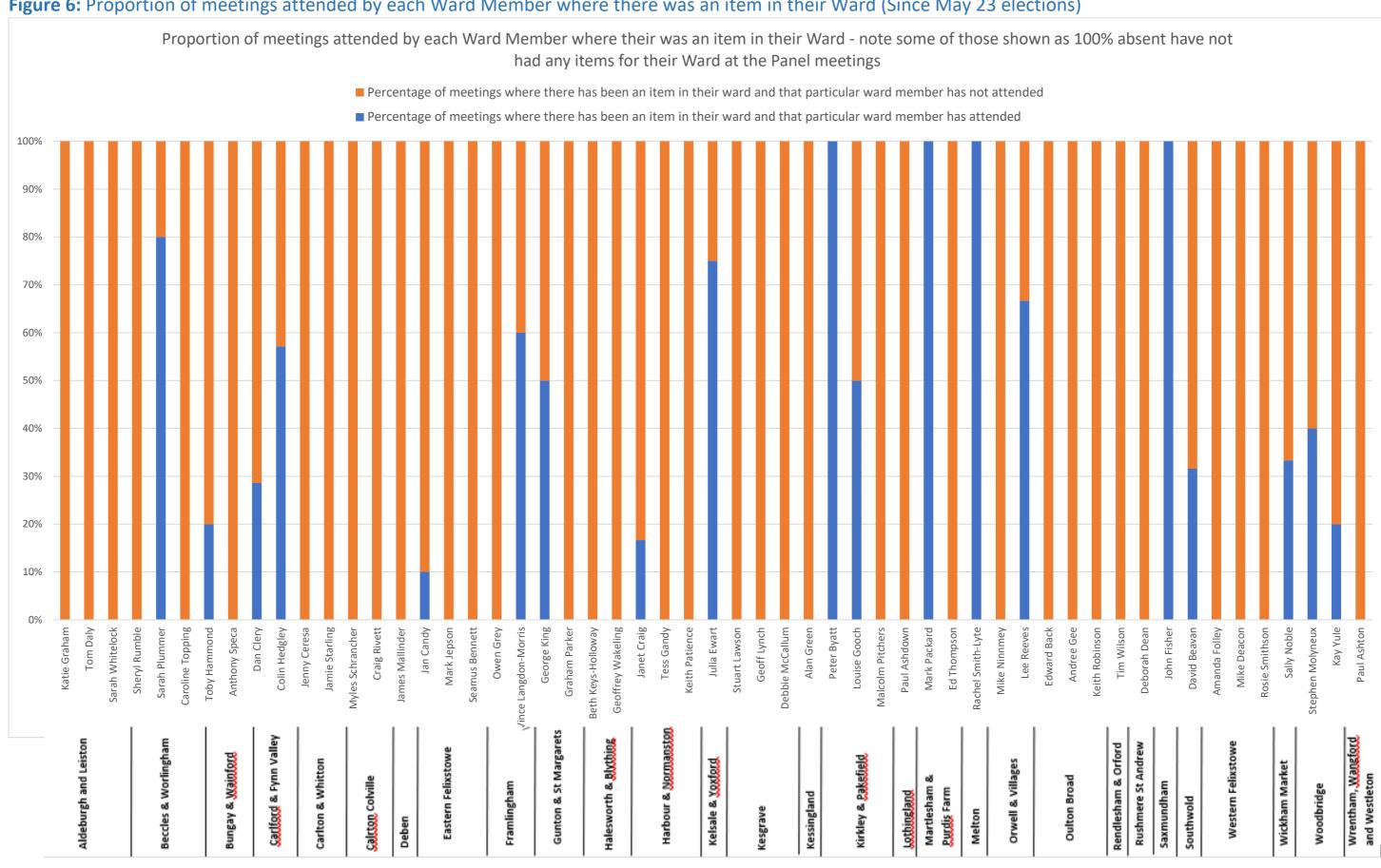


Figure 7: The Number of Items per Referral Panel meeting where the relevant ward member(s) were present at the meeting, shown by meeting (Since May 23 elections)

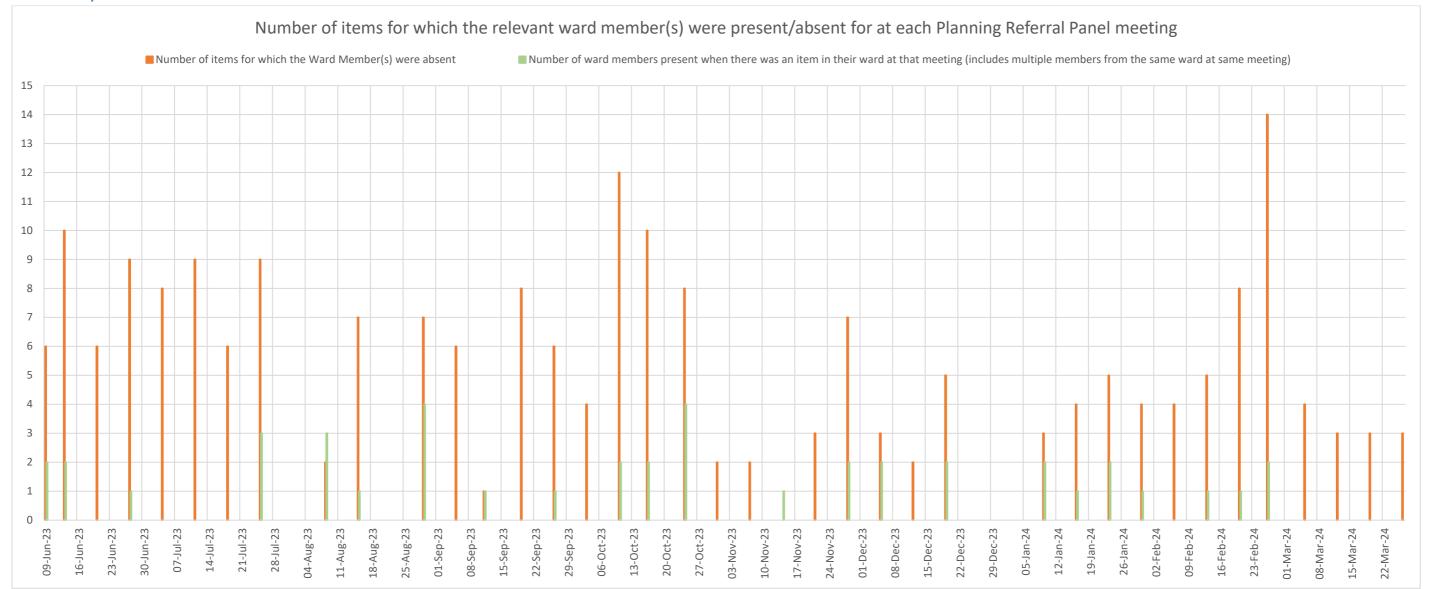


Figure 8: The Number of members at each meeting (Since May 23 elections)

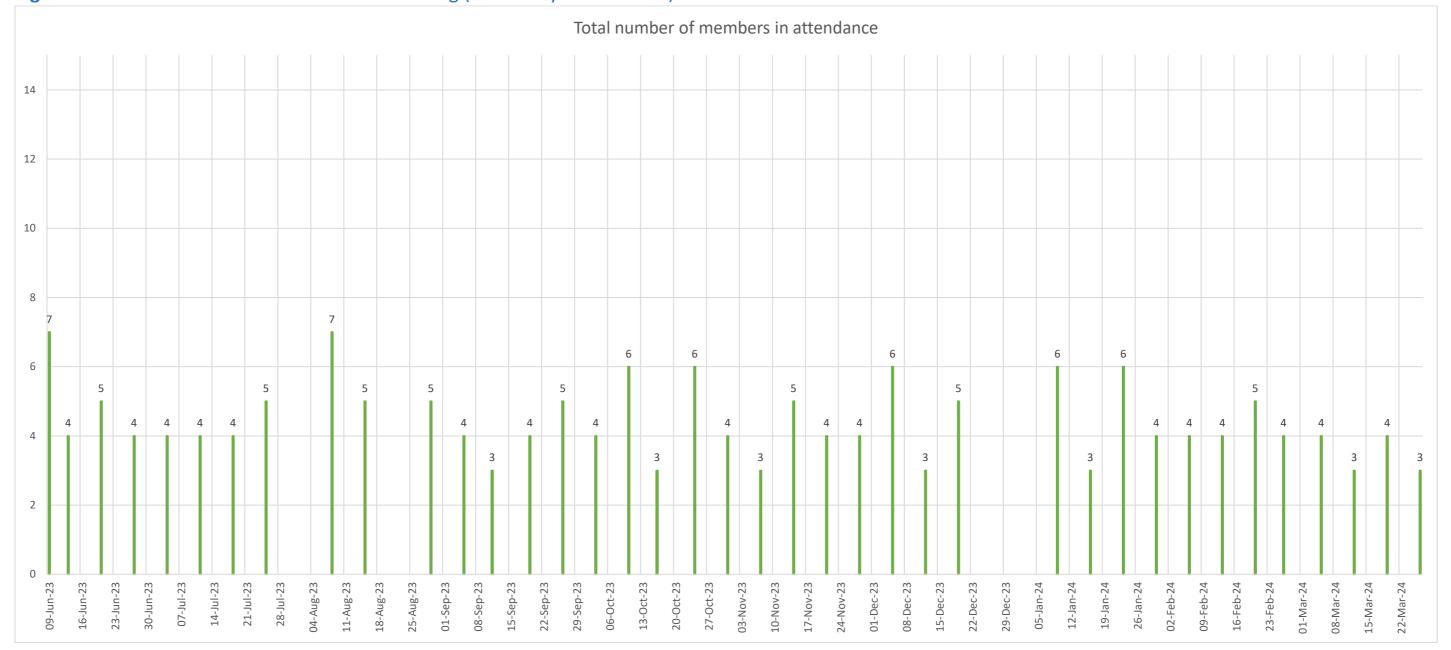


Figure 9: The Number/Proportion of Ward Members who have attended at least 1 Referral Panel Meeting during each year since the Referral Panel was introduced (i.e. Since April 2019)

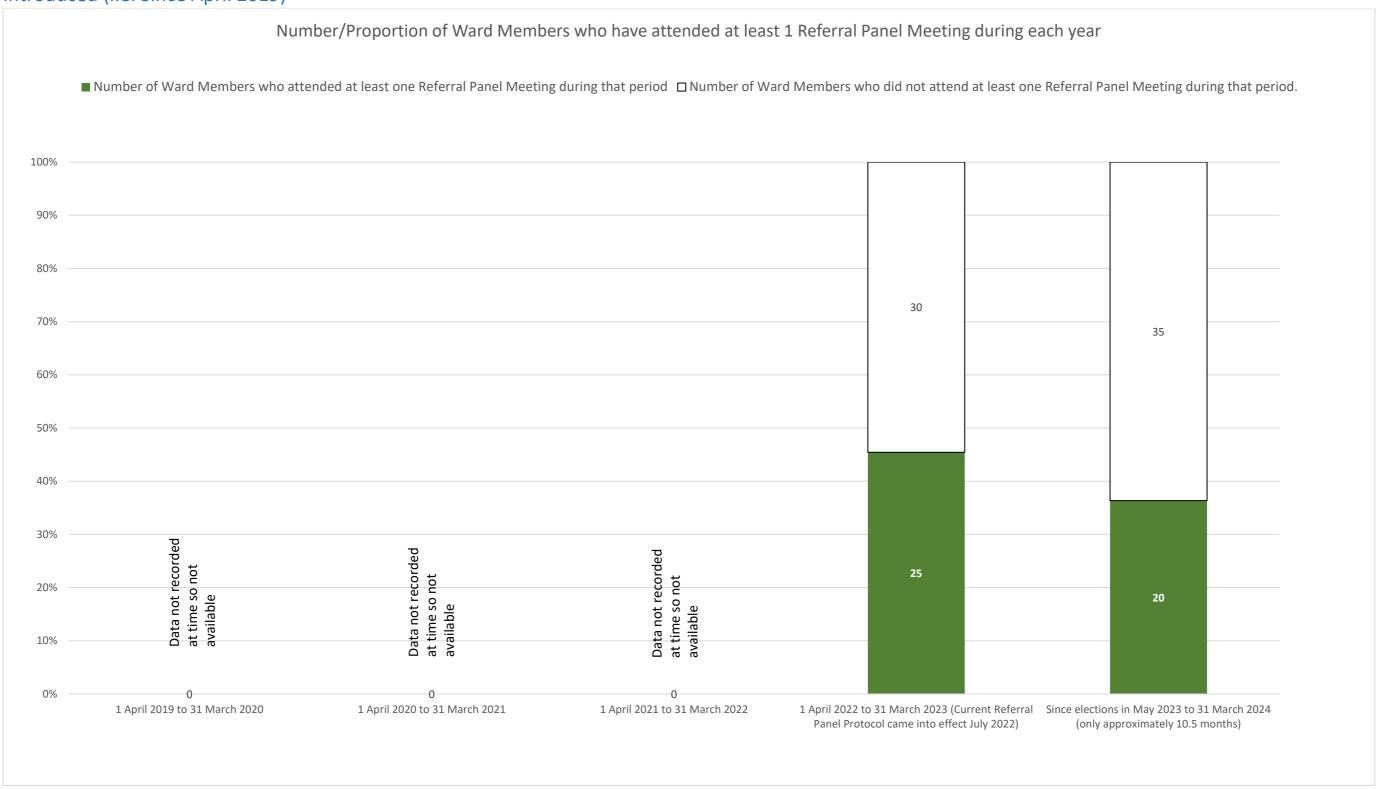


Figure 10: Number of Ward Members who have attended a meeting where there was an item in their ward, and there had/hadn't been written comments submitted by a relevant ward Member (Since May 23 elections)

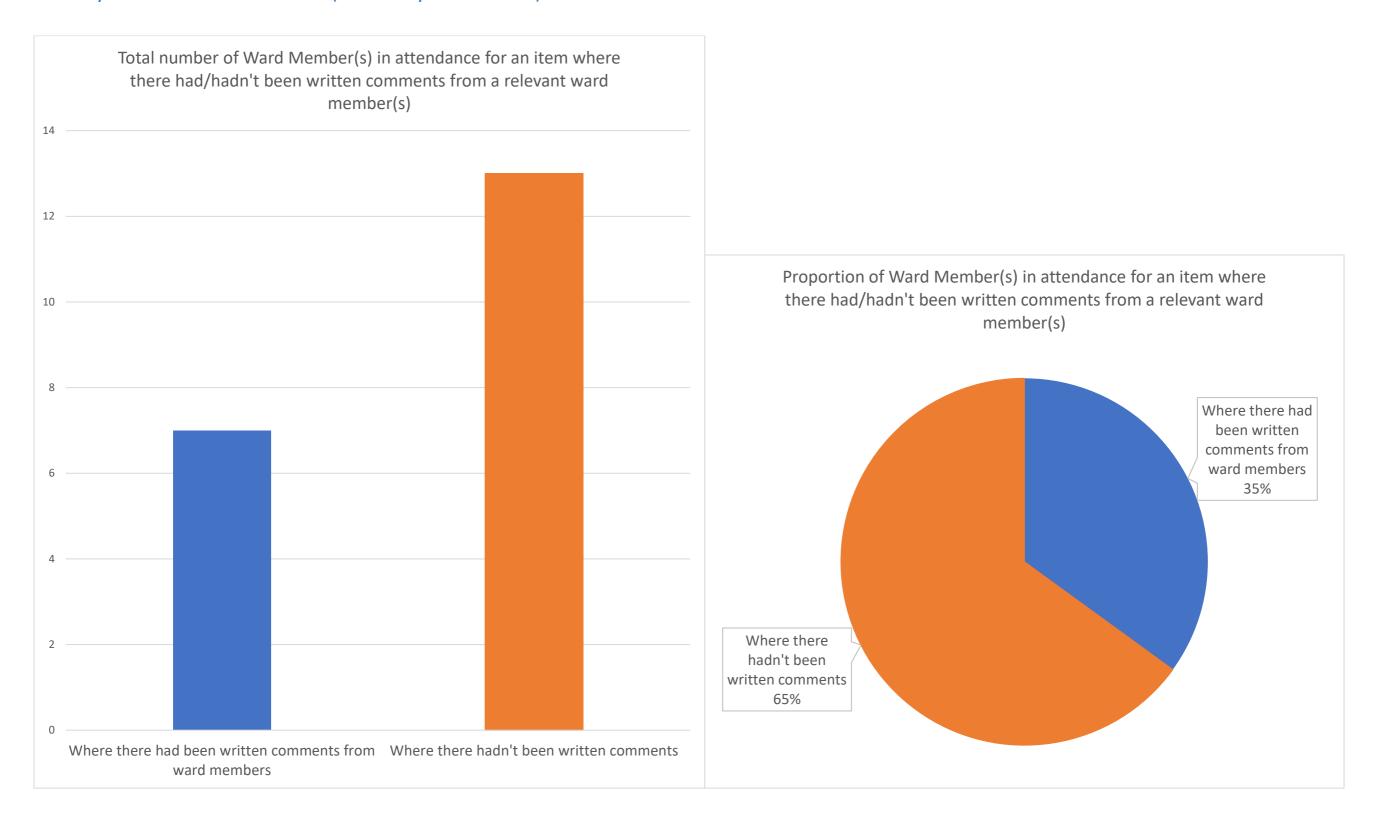


Figure 11: The number of times each member has attended a Referral Panel Meeting where they/other members of their ward had or hadn't submitted written comments on the application (Since May 23 elections)

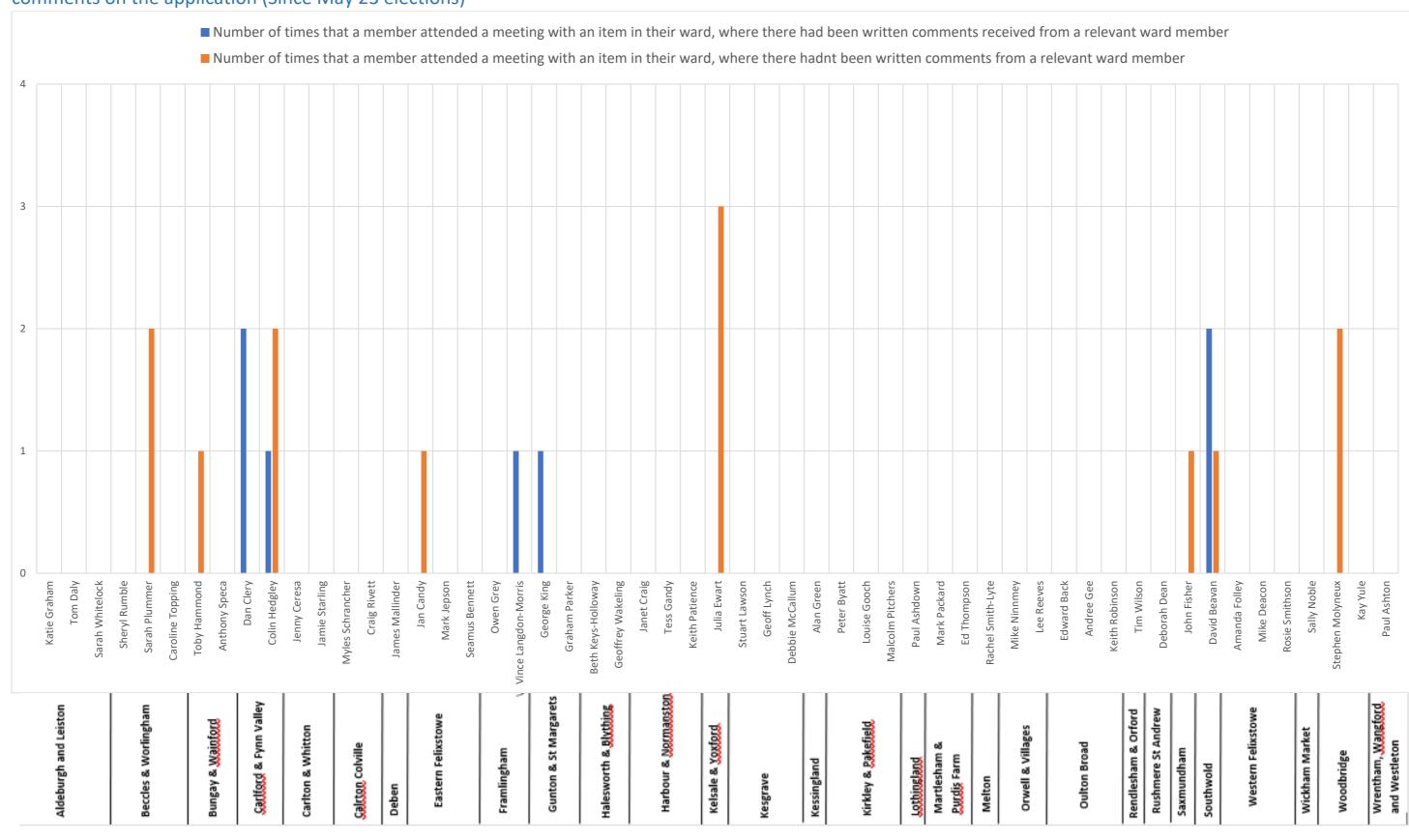




Figure 1: Overview of Committee Procedures as published in the East Suffolk Council Constitution

6 COMMITTEE PROCEDURES

- 6.1 The Planning Committee papers will be available, in accordance with the Access to Information Act provisions, at least five clear working days prior to the meeting.
- 6.2 All applications presented to the Planning Committee for determination will have a full written report from Officers, including the substance of objections, and the views of those who have been consulted on the proposal, a clear explanation of the relevant Development Plan policies or legislation, site related history, any other material planning considerations or relevant information, a reasoned consideration of the proposal and a clear recommendation.
- 6.3 Any material information which is received after the written report has been prepared but more than 24 hours before the start of the Planning Committee meeting will be presented orally by Officers. Information received within 24 hours of the start of the meeting will only presented where it is brief and can be readily conveyed to the Committee.
- 6.4 The Head of Planning and Coastal Management will have the discretion to withdraw any item from the agenda of the Planning Committee subsequent to the preparation of the report, but prior to a discussion by the Planning Committee if the circumstance of the application has changed within that period.
- 6.5 Where an application is determined in accordance with an Officers' report the decision will be as set out in that report subject to any amendments which Officers or Members may put forward at the meeting.
- 6.6 Where the Planning Committee disagrees with the Officers' professional advice, the reasons for rejecting a report's recommendation will be clearly stated at the meeting and recorded in the minutes. Members need to be sure that when they do not follow Officers' professional advice, their decisions are based on sound planning reasons. Members shall be aware that they may be required themselves to justify their decision at appeal.
- 6.7 The Council considers that there are benefits in allowing public speaking at Planning Committee meetings. A summary of the adopted practice is set out in Appendix C.
- 6.8 Where a planning obligation is required in respect of a development proposal, the Officers' report to the Planning Committee will set out the reasons for this and

Part 4 - Codes and Protocols

Page 232

East Suffolk Council Constitution

indicate any principal terms that the obligation might contain. If the Planning Committee requires additional or amended obligations they shall be clearly specified by the Planning Committee and in all cases the detail will also be recorded in the minutes of the meeting.

6.9 A register is kept of planning obligations entered into and an annual report will be made to the Strategic Planning Committee summarising progress in the receipt and use of financial sums or development in kind received in accordance with a planning obligation.

East Suffolk Council Constitution - Part B

APPENDIX C

PUBLIC SPEAKING PROCEDURES FOR PLANNING COMMITTEE MEETINGS

Subject to the procedure detailed below, there is a right to speak for, or against, any applications for rights of way, planning permission or similar applications (e.g. Listed Building). There is no right to speak on enforcement issues, which appear on the agenda of the Planning Committee.

PROCEDURE WHEN AN ITEM IS SCHEDULED TO BE REPORTED TO A PLANNING COMMITTEE

Progress on applications can be monitored online by visiting the Council's website – www.eastsuffolk.gov.uk. This will indicate if the application is going to be considered by the Planning Committee and, if so, when. The following would normally be permitted to speak:

- representative of Town / Parish Council or Parish Meeting;
- applicant or representative;
- objector;
- relevant ward Members

The intention is that only one person would speak from each of the above parties.

PROCEDURES AT PLANNING COMMITTEE MEETINGS

Interested parties who wish to speak will be able to register to do so, using an online form. Registration may take place on the day that the reports for the scheduled meeting are published on the Council's website, until 5.00pm on the day prior to the scheduled meeting. A link to the online form will be included on each published agenda.

Online registration form to speak at Planning Committees.

ORDER OF SPEAKING

The order of debate will be as follows:

- 1. Introduction by Planning Officer or relevant Officer for rights of way applications;
- 2. Representations by objector (objecting to the recommendation);
- Representations by relevant town or parish council (in exceptional circumstances
 the Chairman may allow more than one parish council to send a representative by
 prior agreement where a development proposal is of such magnitude that it
 affects several parishes);
- 4. Representations by applicant or representative;
- Ward Member(s)
- 6. Planning Committee general debate.

DURATION OF SPEAKING

Speakers, other than Ward Members, will be given a maximum of three minutes to speak in presentation, with the Chairman having absolute discretion as to how many and in what form questions are allowed over and above the three-minute presentation. No speaker will be given a second opportunity to speak to ensure equality of representation. All questions should be based upon matters of fact only and channelled exclusively through the Chair. There will be no general debate, including those engaged in public speaking, given that the purpose of allowing public speaking is to make appropriate representations and to tease out matters of fact.

Part 4 - Codes and Protocols

Page 232

East Suffolk Council Constitution - Part B ILLUSTRATIVE MATERIAL If a speaker wishes to refer to illustrative material, which they wish to be displayed at the meeting, then this must be provided to the Officers 24 hours in advance of the meeting so that appropriate arrangements can be made for its display. If the application is deferred until the next meeting for further information, negotiations or a site visit, either before or after public speaking, speakers will have the opportunity to present their views again. There will be an Officer present at all meetings to ensure that procedures are properly followed.

Appendices to the Review of the North, South and Strategic Planning Committees and the work of the Referral Panel 2023-2024

124 | Page

Page 233

Part 4 - Codes and Protocols

Figure 2: Illustration of how 'Planning Applications' can reach Planning Committee at East Suffolk Council

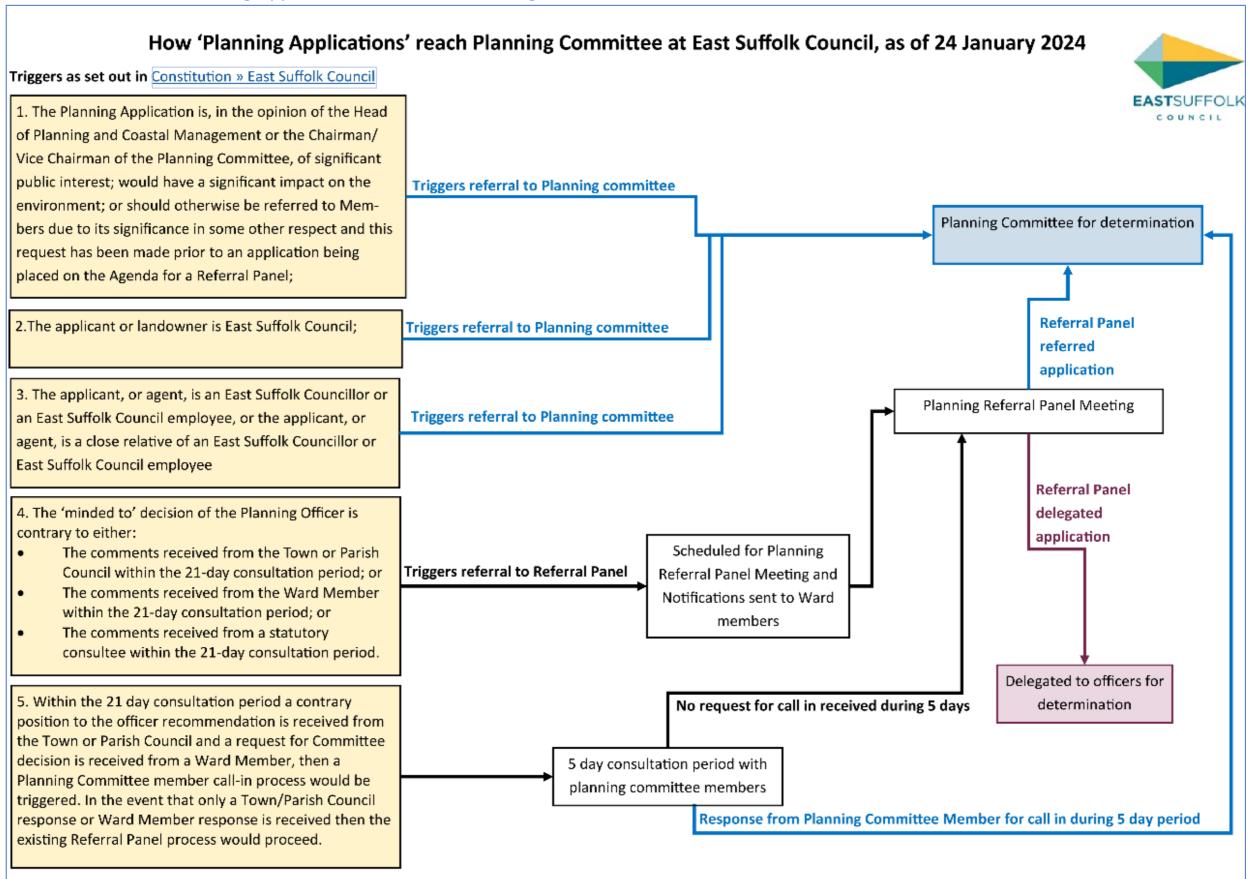


Figure 3: Public Speaking Procedures for Planning Committee Meetings as published in the East Suffolk Council Constitution

APPENDIX C

PUBLIC SPEAKING PROCEDURES FOR PLANNING COMMITTEE MEETINGS

Subject to the procedure detailed below, there is a right to speak for, or against, any applications for rights of way, planning permission or similar applications (e.g. Listed Building). There is no right to speak on enforcement issues, which appear on the agenda of the Planning Committee.

PROCEDURE WHEN AN ITEM IS SCHEDULED TO BE REPORTED TO A PLANNING COMMITTEE

Progress on applications can be monitored online by visiting the Council's website – www.eastsuffolk.gov.uk. This will indicate if the application is going to be considered by the Planning Committee and, if so, when. The following would normally be permitted to speak:

- representative of Town / Parish Council or Parish Meeting;
- applicant or representative;
- objector;
- relevant ward Members

The intention is that only one person would speak from each of the above parties.

PROCEDURES AT PLANNING COMMITTEE MEETINGS

Interested parties who wish to speak will be able to register to do so, using an online form. Registration may take place on the day that the reports for the scheduled meeting are published on the Council's website, until 5.00pm on the day prior to the scheduled meeting. A link to the online form will be included on each published agenda.

Online registration form to speak at Planning Committees.

ORDER OF SPEAKING

The order of debate will be as follows:

- Introduction by Planning Officer or relevant Officer for rights of way applications;
- 2. Representations by objector (objecting to the recommendation);
- Representations by relevant town or parish council (in exceptional circumstances
 the Chairman may allow more than one parish council to send a representative
 by prior agreement where a development proposal is of such magnitude that it
 affects several parishes);
- 4. Representations by applicant or representative;
- Ward Member(s)
- 6. Planning Committee general debate.

DURATION OF SPEAKING

Speakers, other than Ward Members, will be given a maximum of three minutes to speak in presentation, with the Chairman having absolute discretion as to how many and in what form questions are allowed over and above the three-minute presentation. No speaker will be given a second opportunity to speak to ensure equality of representation. All questions should be based upon matters of fact only and channelled exclusively through the Chair. There will be no general debate, including those engaged in public speaking, given that the

East Suffolk Council Constitution

purpose of allowing public speaking is to make appropriate representations and to tease out matters of fact.

ILLUSTRATIVE MATERIAL

If a speaker wishes to refer to illustrative material, which they wish to be displayed at the meeting, then this must be provided to the Officers 24 hours in advance of the meeting so that appropriate arrangements can be made for its display.

If the application is deferred until the next meeting for further information, negotiations or a site visit, either before or after public speaking, speakers will have the opportunity to present their views again.

There will be an Officer present at all meetings to ensure that procedures are properly followed.

Part 4 - Codes and Protocols

Page 241



Figure 1: The number of items at Planning Committee each Month between 1 April 2023 and 31 March 2024



Figure 2: Number of items at Planning Committee each Month that were Major, Minor and Other, between 1 April 2023 and 31 March 2024

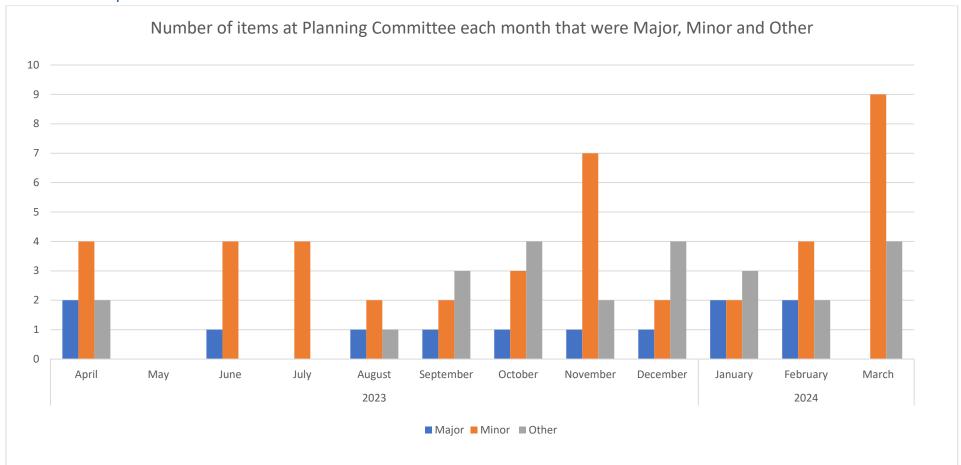


Figure 3: Proportion of items at Planning Committee each Month that were Major, Minor and Other, between 1 April 2023 and 31 March 2024

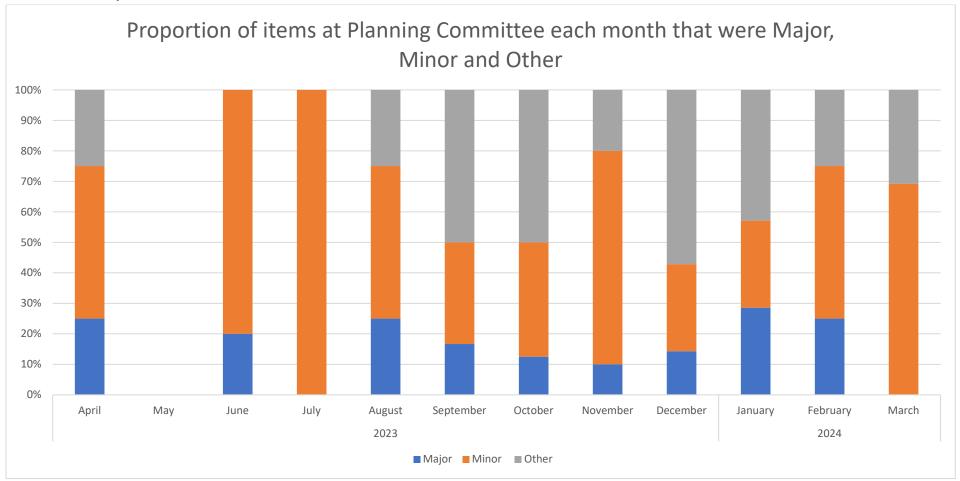


Figure 4: Number of items at Planning Committee that were Major, Minor and Other, between 1 April 2023 and 31 March 2024, shown by Ward.

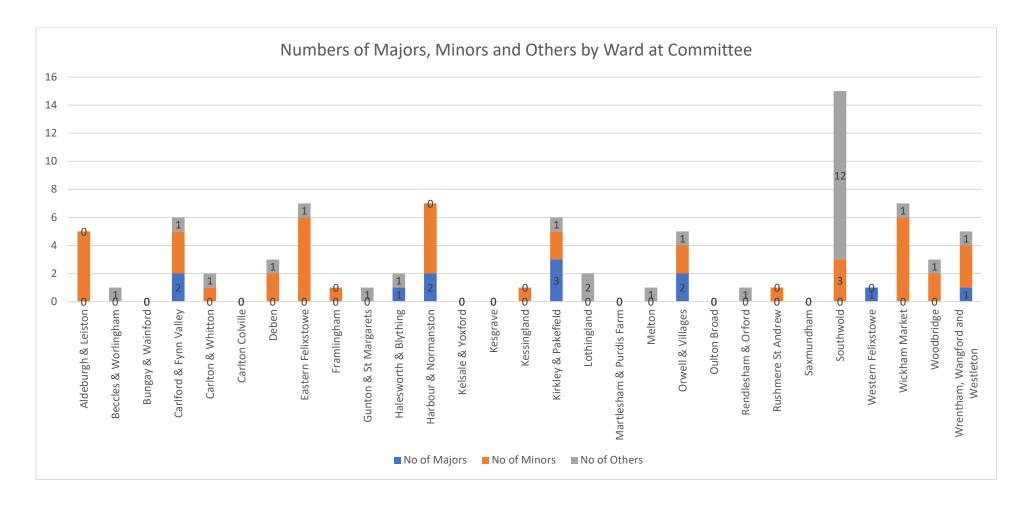
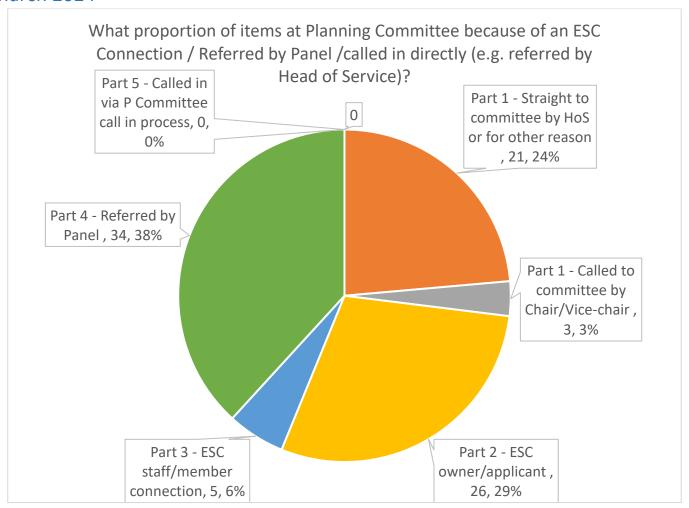




Figure 1: Pie chart showing the proportion of items at Planning Committee for each reason between 1 April 2023 and 31 March 2024



Note: Part 5 – Planning Committee Call in Process has only been in place since 24 January 2024

Figure 2: The reasons items were at Planning Committee (i.e. because of an ESC connection, Referral by the Planning Referral Panel or called in by the Committee Chair/Vice Chair or Head of Service) each month between 1 April 2023 and 31 March 2024, shown by number of items.

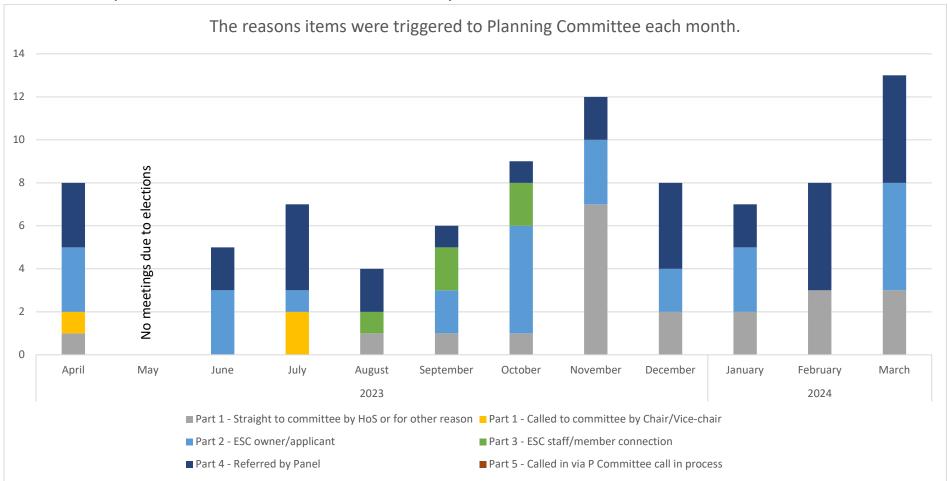


Figure 3: The reasons items were at Planning Committee (i.e. because of an ESC connection, Referral by the Planning Referral Panel or called in by the Committee Chair/Vice Chair or Head of Service) each month between 1 April 2023 and 31 March 2024, shown as proportions.

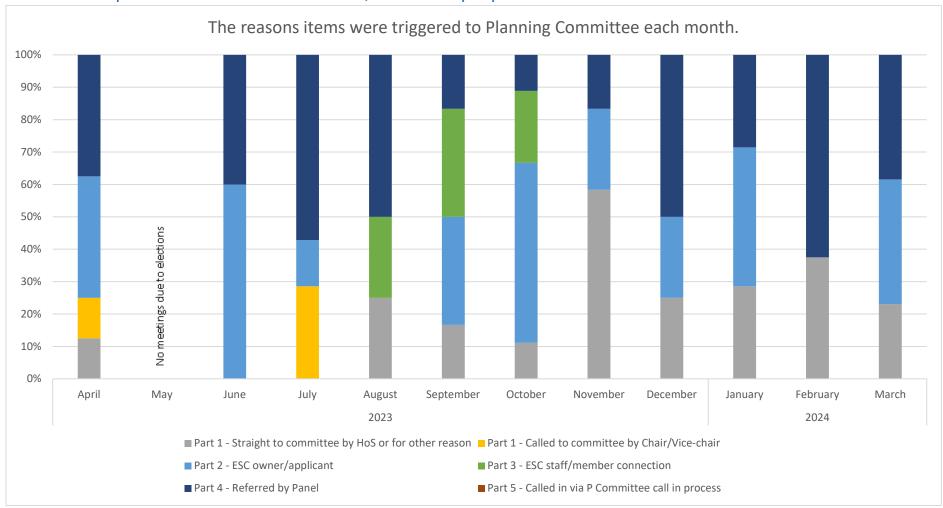
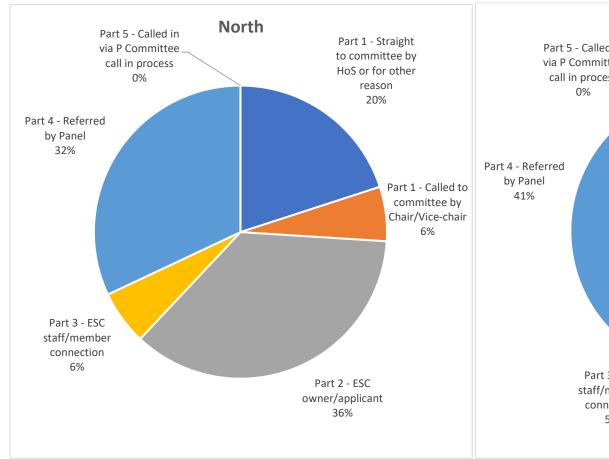


Figure 4: The proportion of items at Planning committee by North/South Committee Area for each reason between 1 April 2023 and 31 March 2024



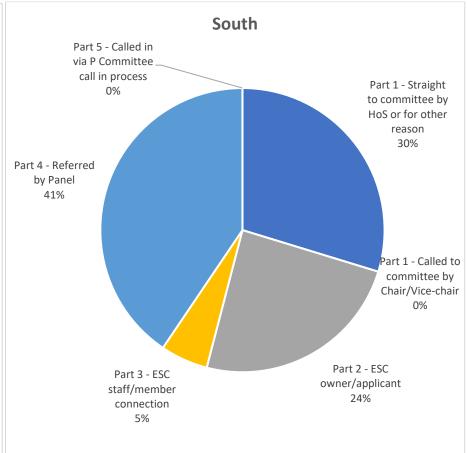


Figure 5: The number of items at Planning committee by Ward with the reasons they were at Planning Committee between 1 April 2023 and 31 March 2024

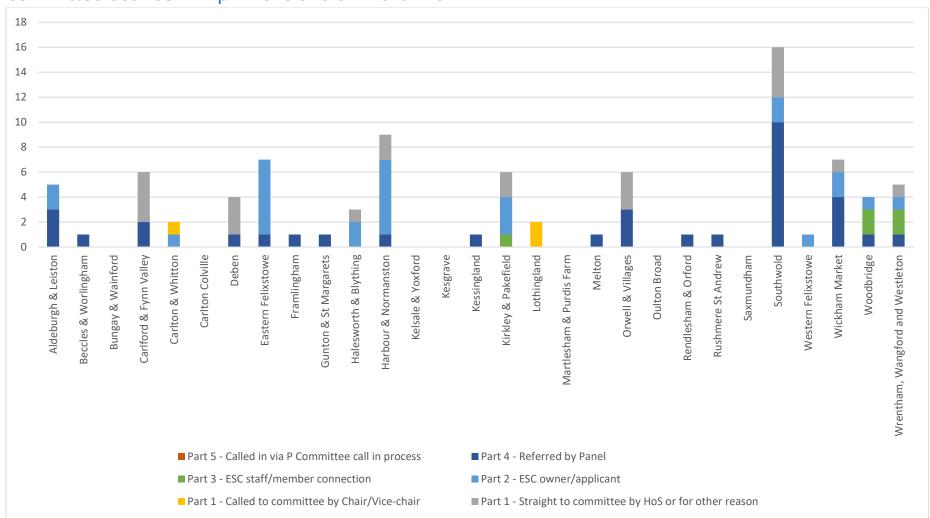
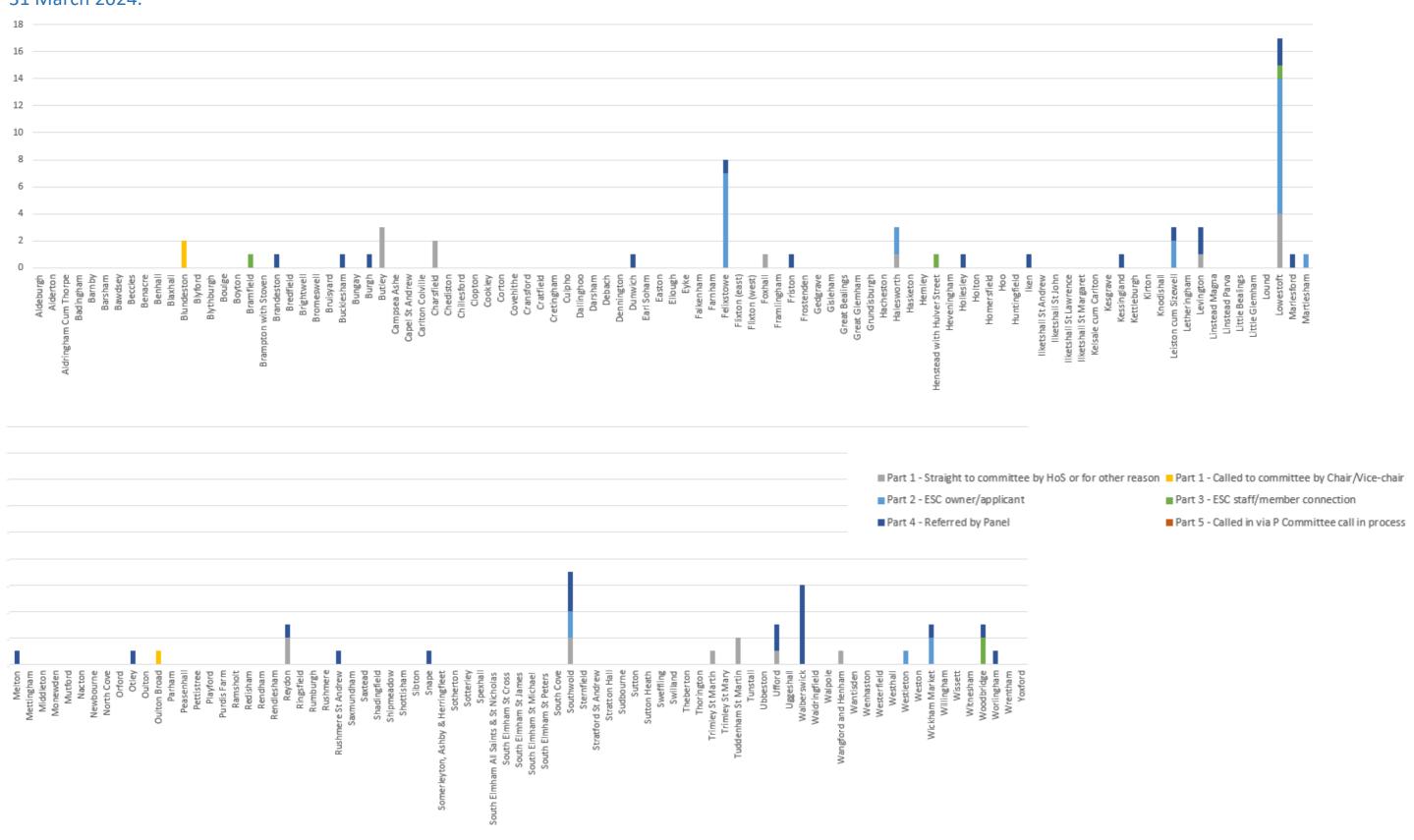


Figure 6: The number of items at Planning committee by Parish with the reasons they could be at Planning Committee for the period between 1 April 2023 and 31 March 2024.





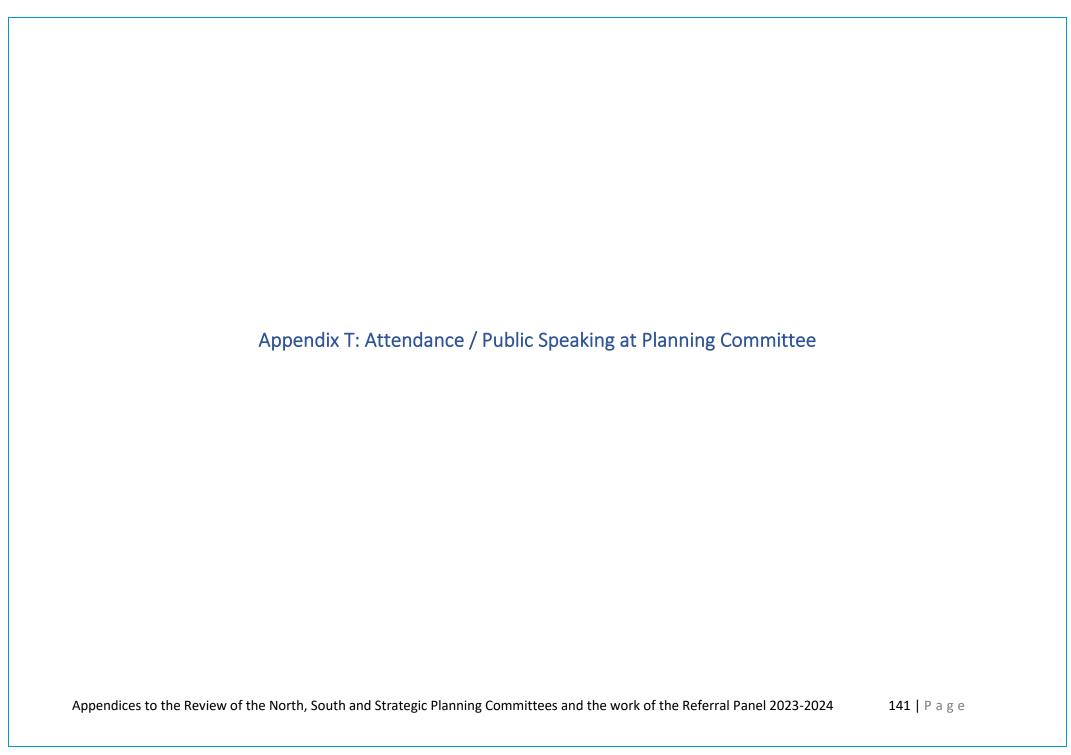


Figure 1: Percentage of Planning Committee items, on which a potential speaker spoke between 1 April 2023 and 31 March 2024

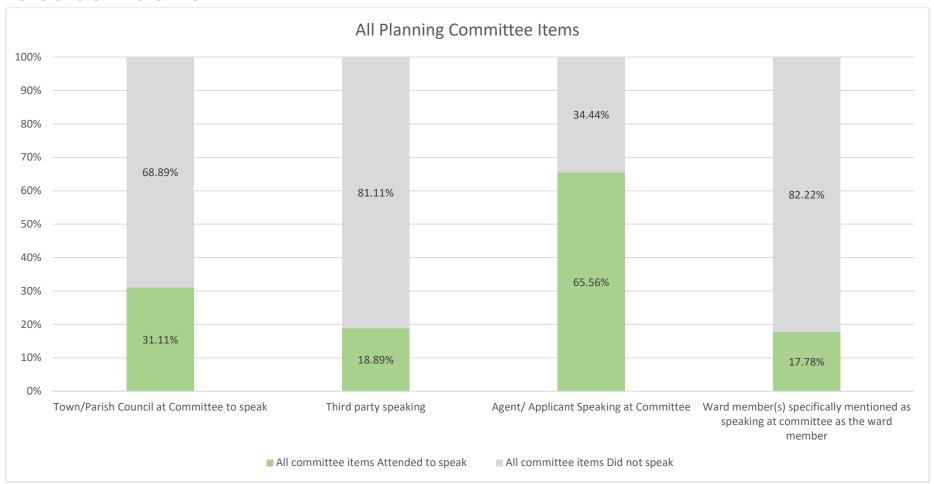


Figure 2: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they had been called straight to Planning Committee by the Head of Service between 1 April 2023 and 31 March 2024

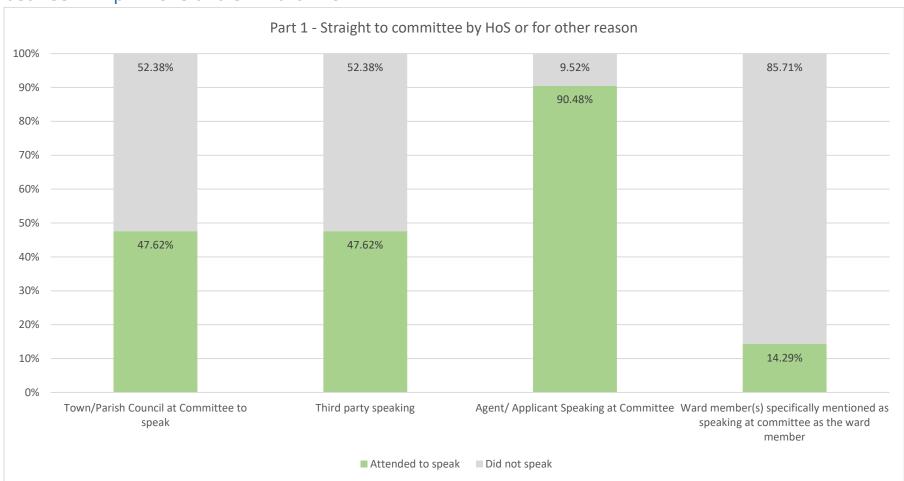


Figure 3: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they had been called straight to Planning Committee by the Chairs/Vice Chairs of Planning Committee between 1 April 2023 and 31 March 2024

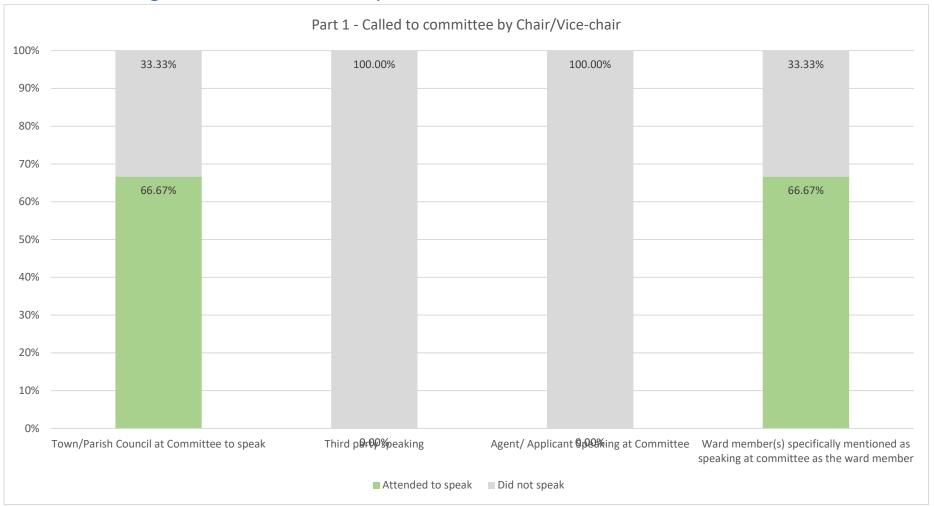


Figure 4: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because ESC were the owners of the land and/or the applicant on the application between 1 April 2023 and 31 March 2024

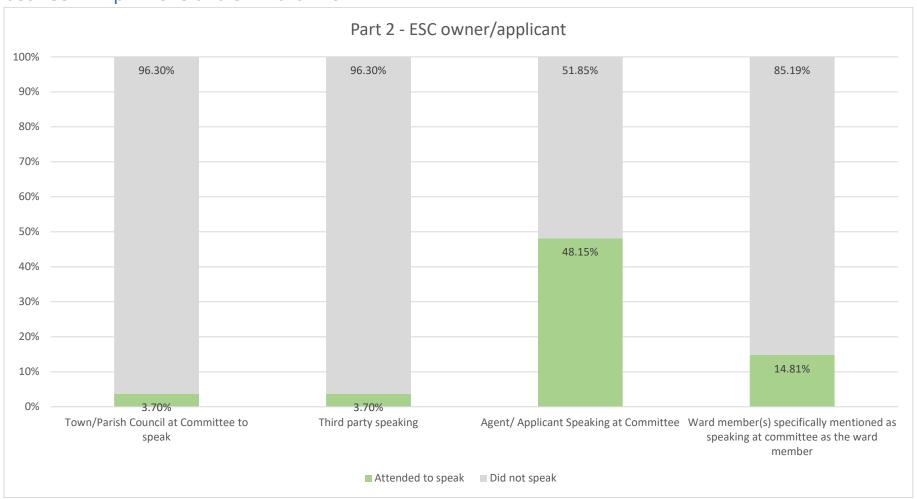


Figure 5: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because there was an ESC Elected Member or member of staff connection between 1 April 2023 and 31 March 2024

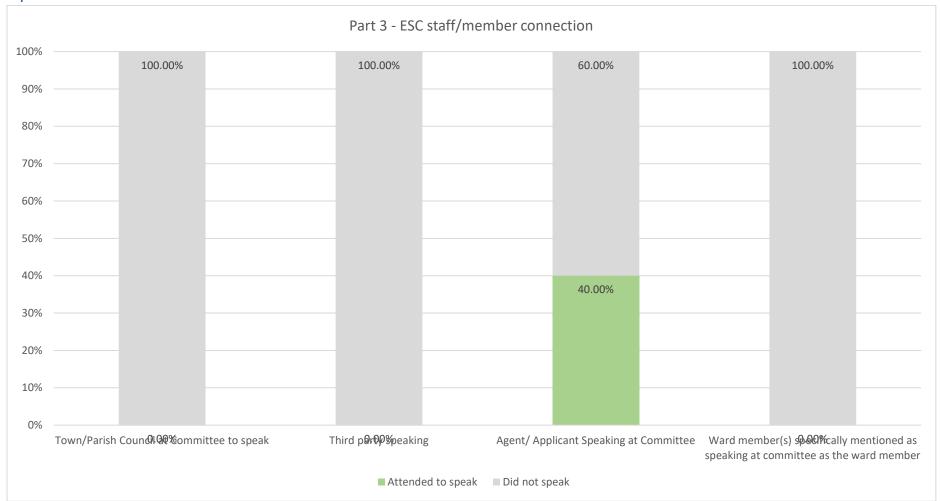


Figure 6: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they had been referred to Planning Committee by the Planning Referral Panel between 1 April 2023 and 31 March 2024

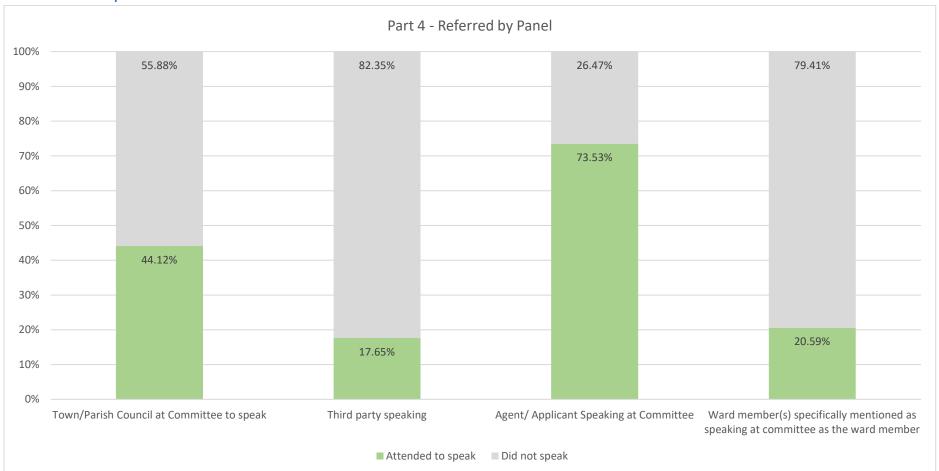
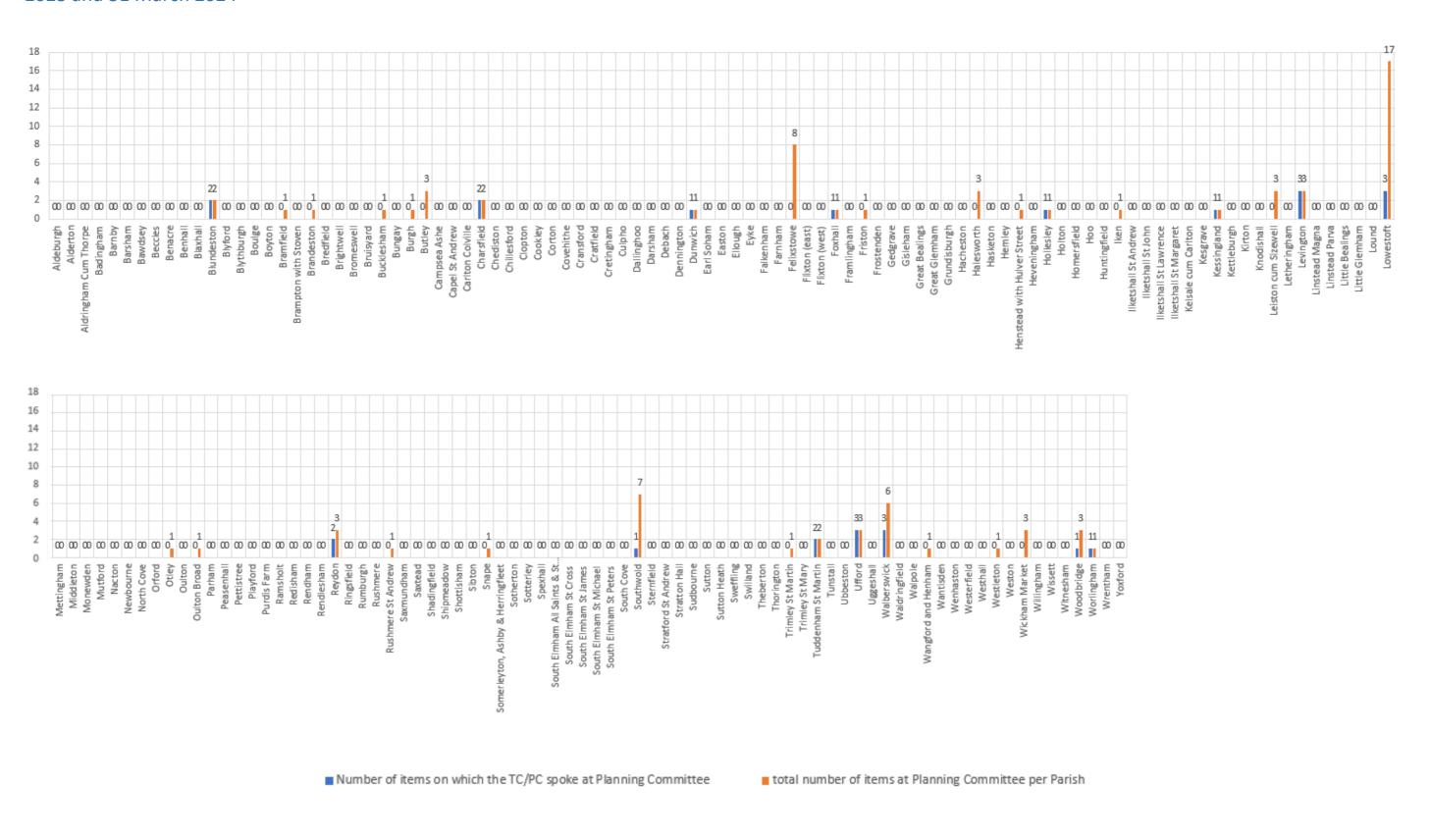


Figure 7: Percentage of Planning Committee items, on which a potential speaker spoke, that were at Planning Committee because they reached planning committed via the Planning Committee Call-in process between 1 April 2023 and 31 March 2024



Figure 8: The number of items at Planning Committee by Parish and the number of items on which the Town/Parish Council attended to speak between 1 April 2023 and 31 March 2024





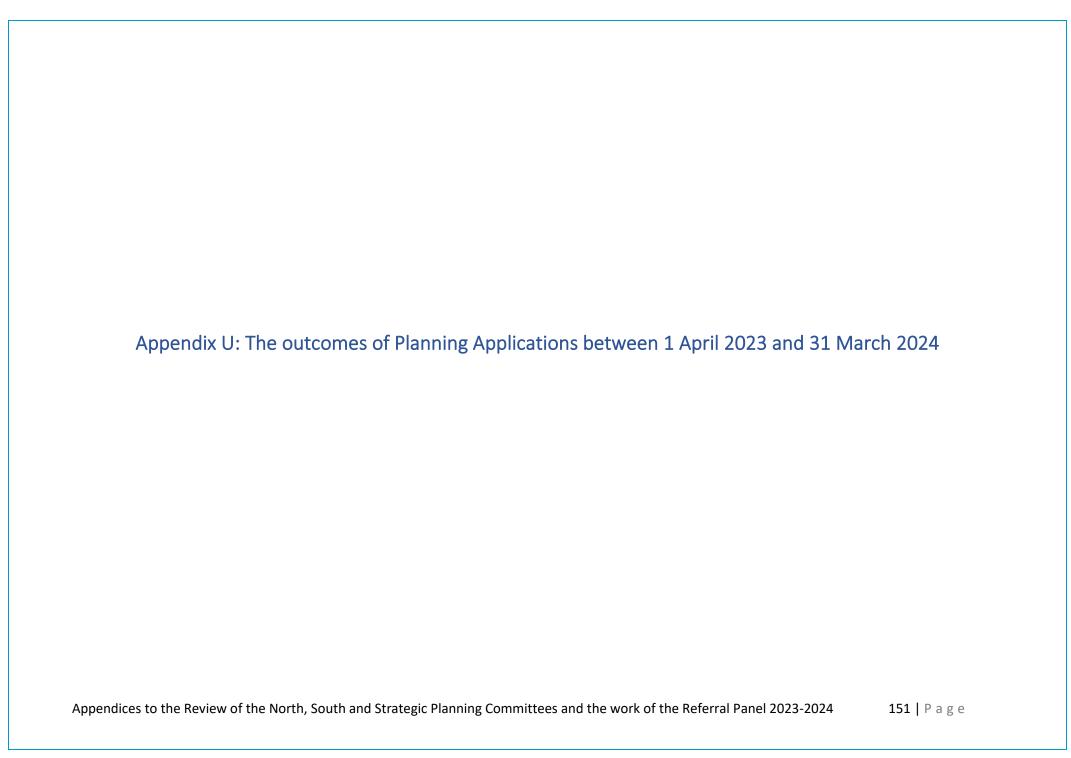


Figure 1: A pie chart showing the proportions of all 'Planning Applications' that were Refused or Approved, between 1 April 2023 and 31 March 2024 (all determination routes)

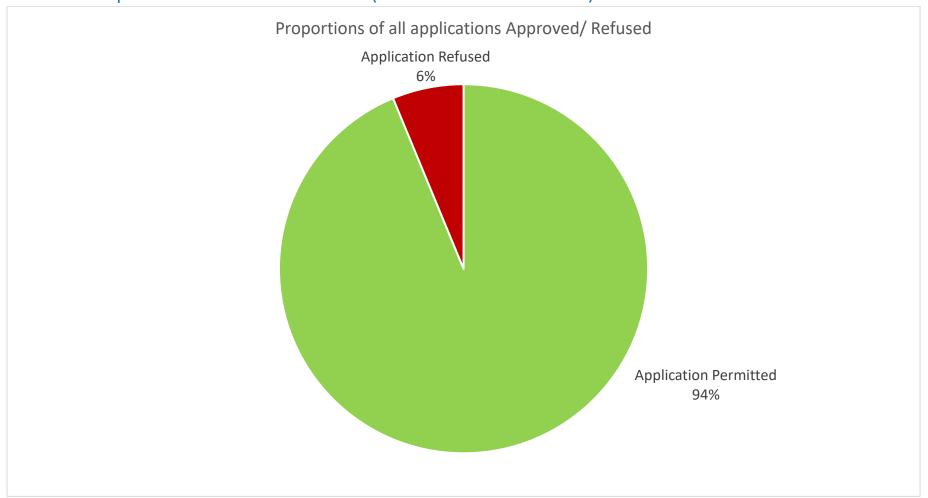


Figure 2: A pie chart showing the proportions of Planning Applications that were Refused or Approved, and determined by officers under the scheme of delegation between 1 April 2023 and 31 March 2024

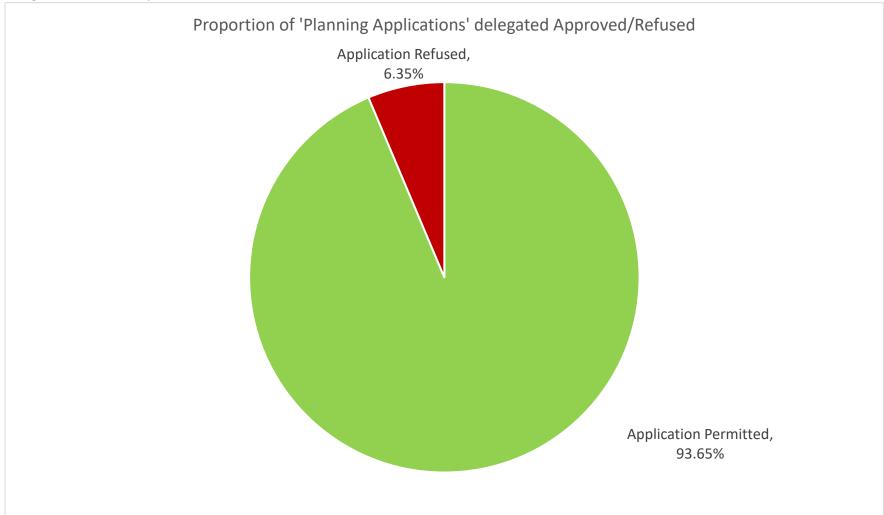


Figure 3: A Pie chart showing the proportion of Planning Applications that were Refused or Approved, following being delegated by the Planning Referral Panel back to officers, between 1 April 2023 and 31 March 2024

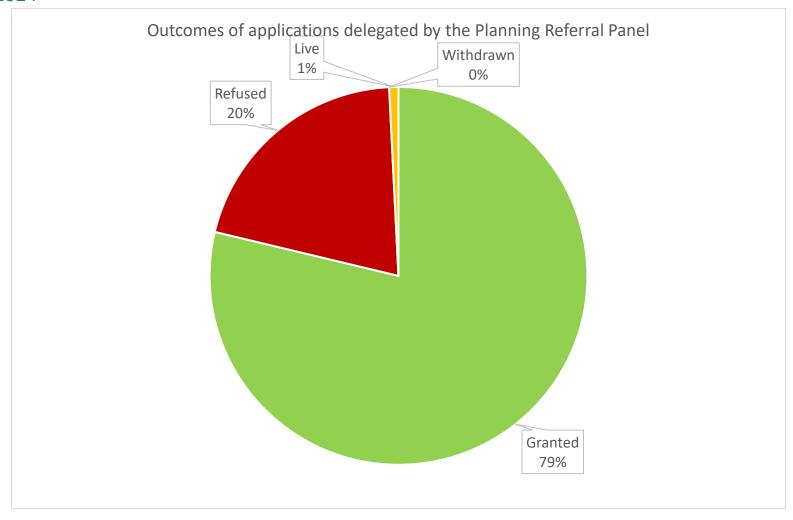


Figure 4: Pie Chart showing the proportion of all Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024.

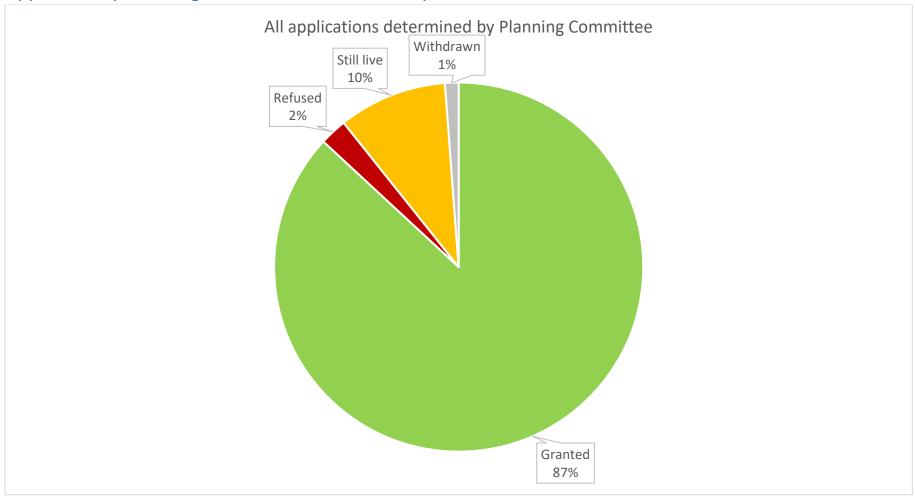


Figure 5: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024, that were called straight to Planning Committee by the Head of Service

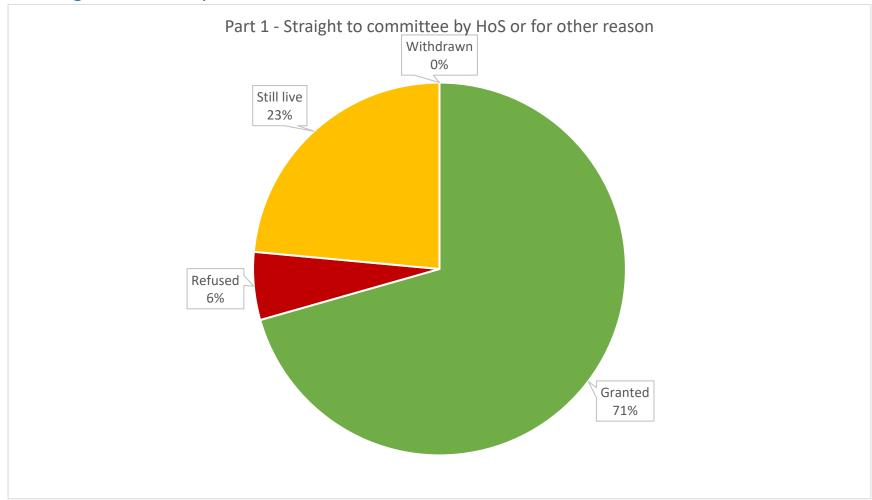


Figure 6: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024, that were called straight to Planning Committee by the Chair or Vice-Chair of Planning Committee

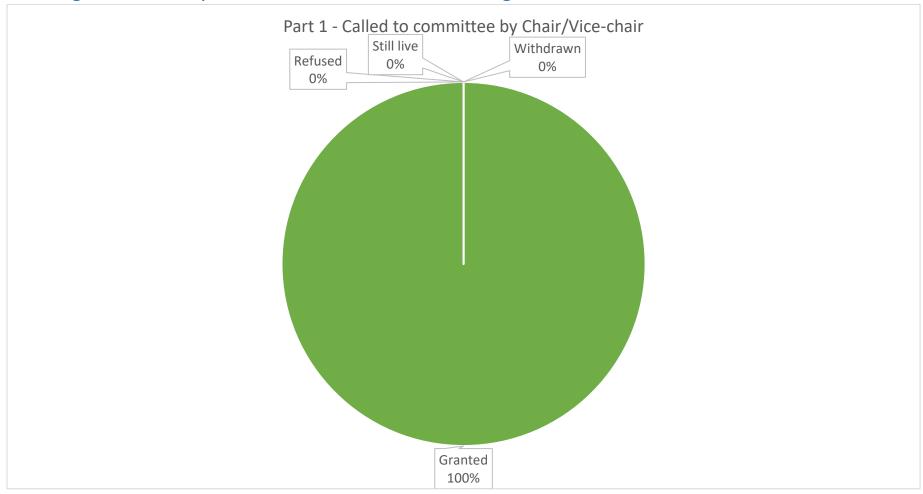


Figure 7: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024, that were at Planning Committee due to East Suffolk Council being either the applicant and/or land owner

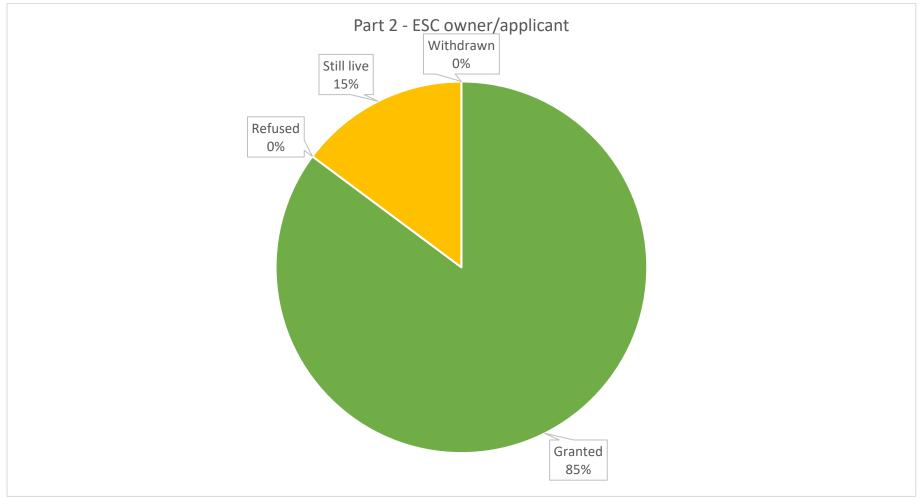


Figure 8: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024, that were at Planning Committee due to the applicant and/or agent being an ESC Elected Member or ESC member of staff or close relative of either

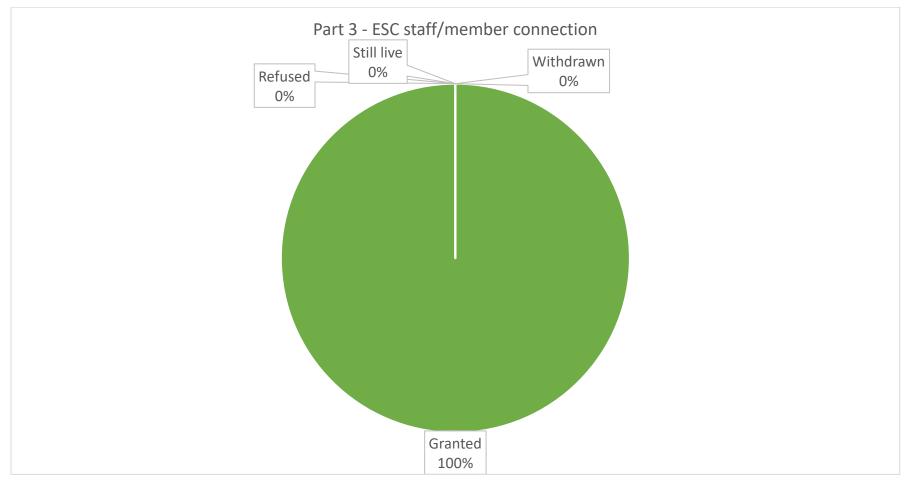


Figure 9: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024, that were at Planning Committee due to being referred by the Planning Referral Panel

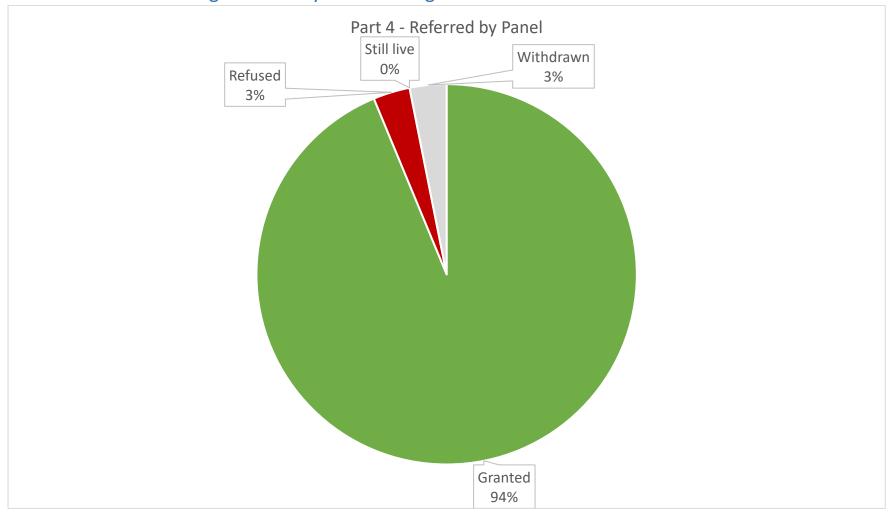


Figure 10: Pie Chart showing the proportion of Planning Applications that were resolved to be Refused or Approved, by Planning Committee, between 1 April 2023 and 31 March 2024, that were at Planning Committee via the Planning Committee Call in Process

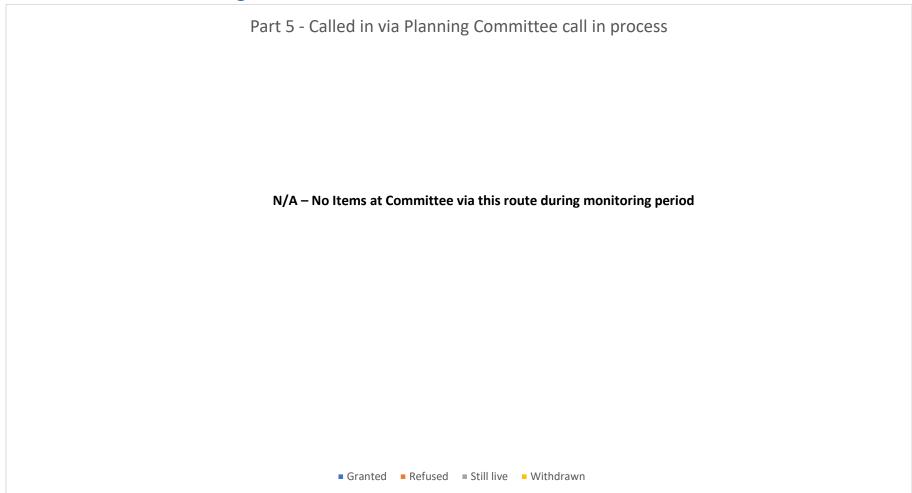


Figure 11: Comparison between the different determination process routes and the outcomes of the applications.



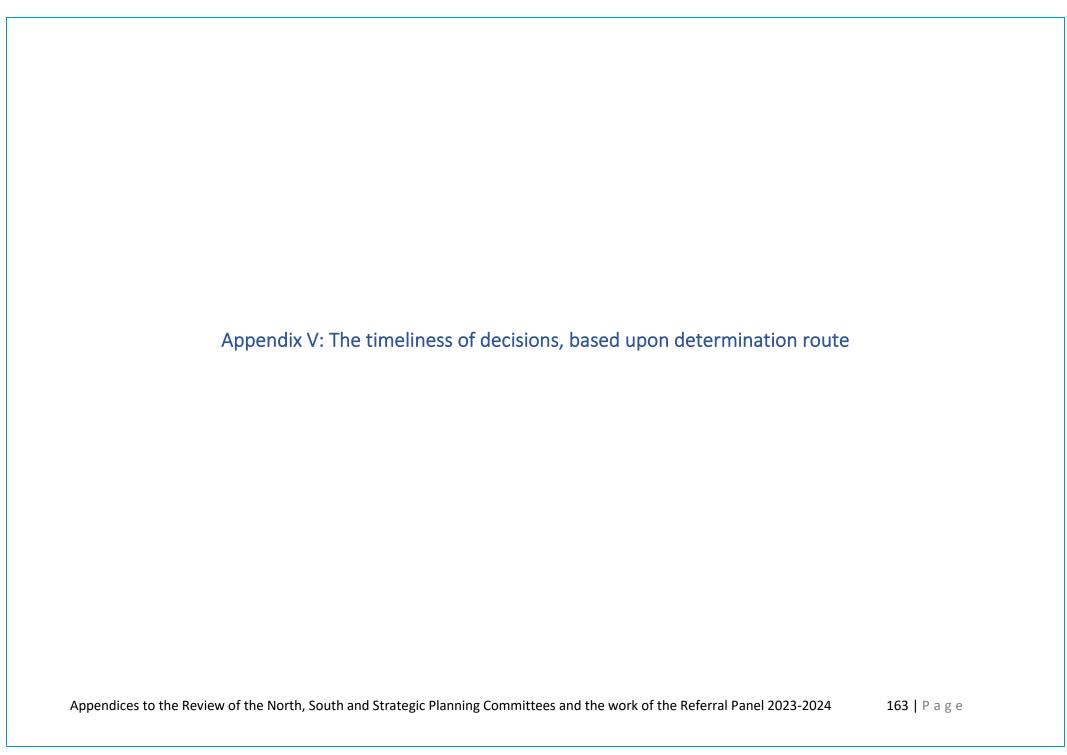


Figure 1: The timeliness of all 'Planning Applications' determined at officer level (including those that were delegated by the Planning Referral Panel) (1 April 2023 – 31 March 2024)

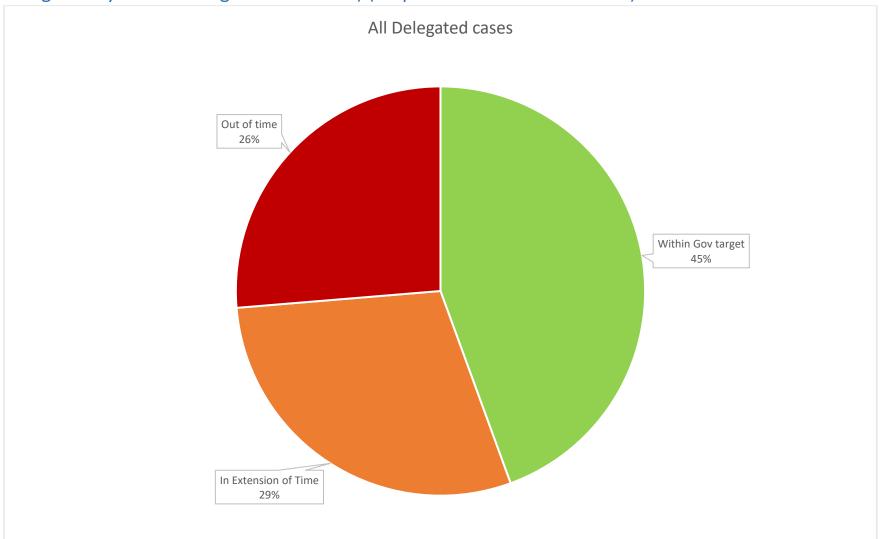


Figure 2: The timeliness of 'Planning Applications' determined at officer level, without triggering the Planning Referral Panel. (1 April 2023 – 31 March 2024)

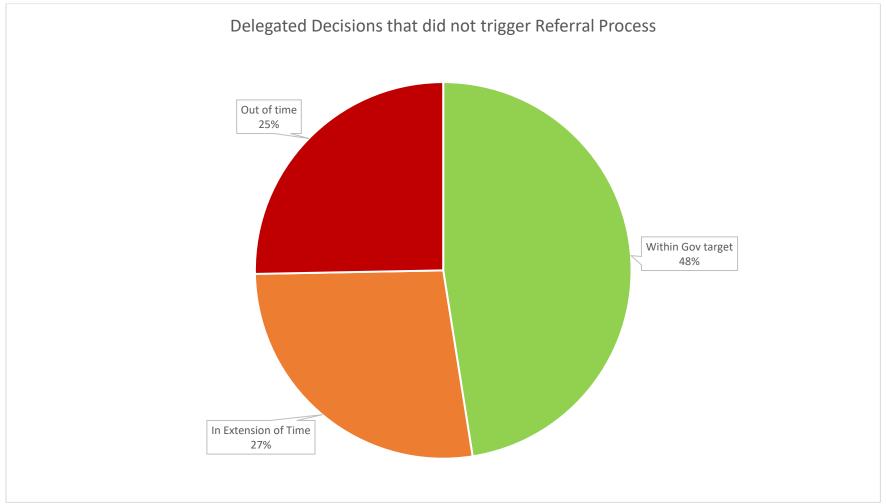


Figure 3: The timeliness of 'Planning Applications' determined at officer level, which triggered the Planning Referral Process and were then delegated back to officers for determination. (1 April 2023 – 31 March 2024)

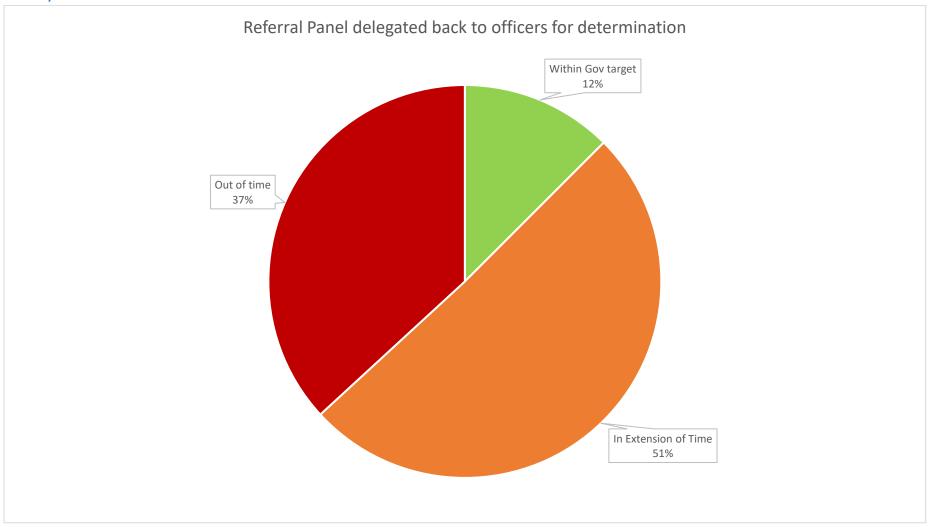


Figure 4: The timeliness of all 'Planning Applications' determined at Planning Committee (no matter their route to committee) (1 April 2023 – 31 March 2024)

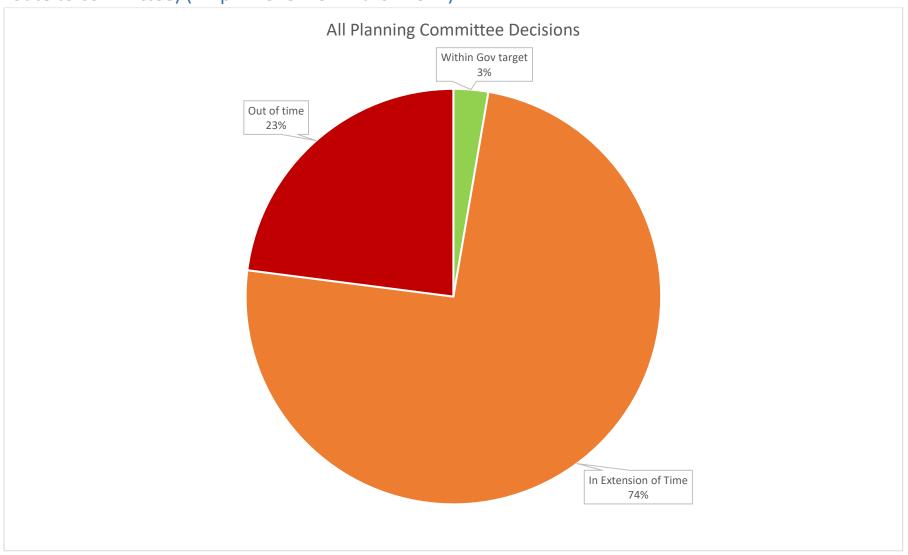


Figure 5: The timeliness of 'Planning Applications' determined at Planning Committee due to being called straight to Committee by the Head of Service (1 April 2023 – 31 March 2024)

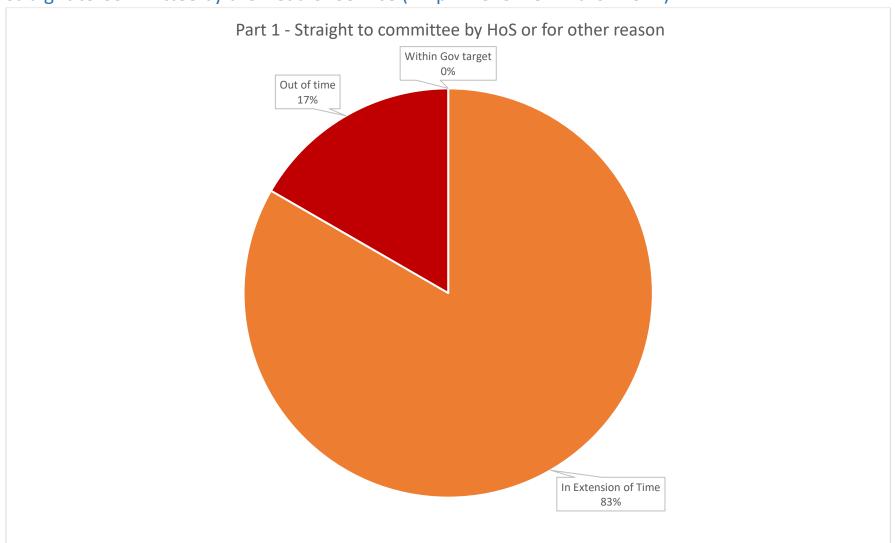


Figure 6: The timeliness of 'Planning Applications' determined at Planning Committee due to being called straight to Committee by the Chair/Vice-Chair of Planning Committee (1 April 2023 – 31 March 2024)

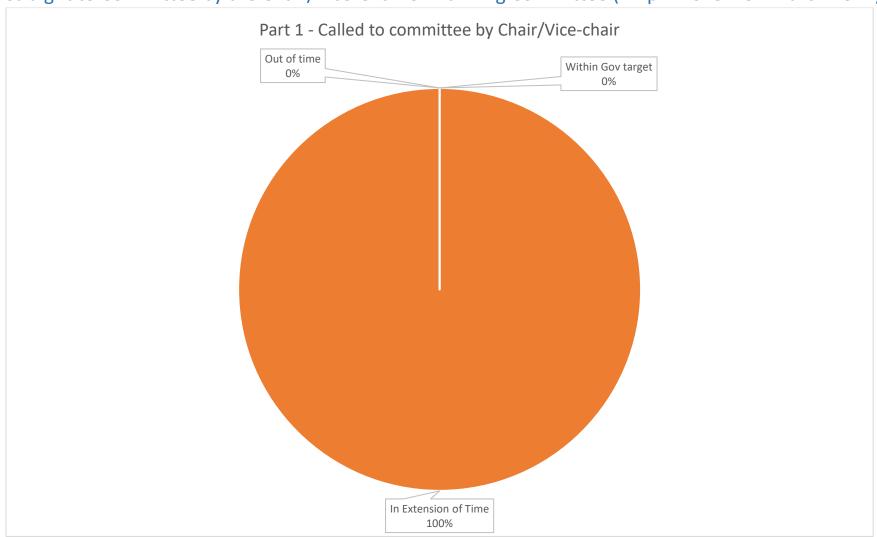


Figure 7: The timeliness of 'Planning Applications' determined at Planning Committee due to East Suffolk Council being either the applicant and/or land owner (1 April 2023 – 31 March 2024)

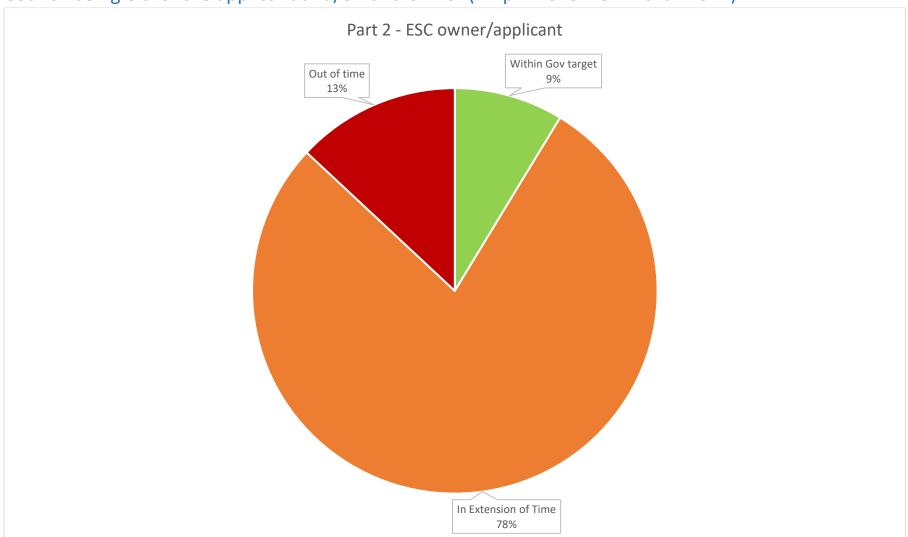


Figure 8: The timeliness of 'Planning Applications' determined at Planning Committee due to the applicant and/or agent being an ESC Elected Member or ESC member of staff or close relative of either (1 April 2023 – 31 March 2024)

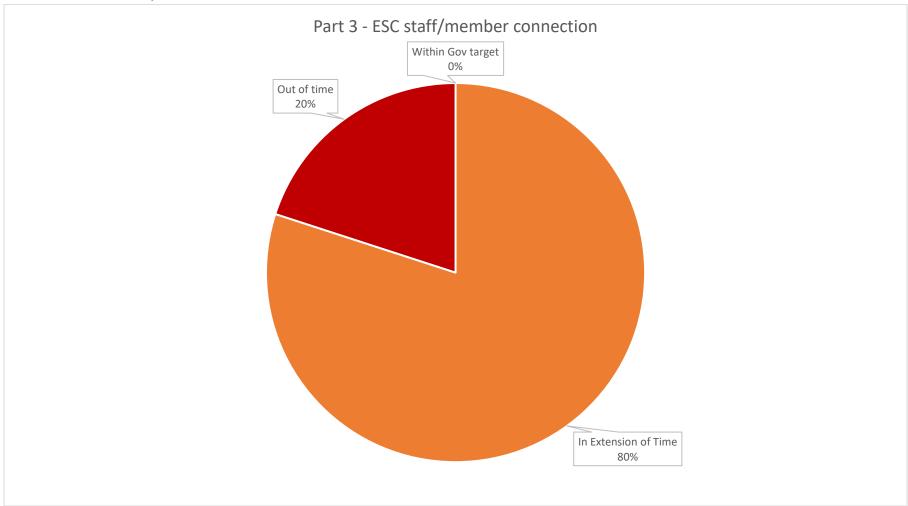


Figure 9: The timeliness of 'Planning Applications' determined at Planning Committee due to being referred by the Planning Referral Panel (1 April 2023 – 31 March 2024)

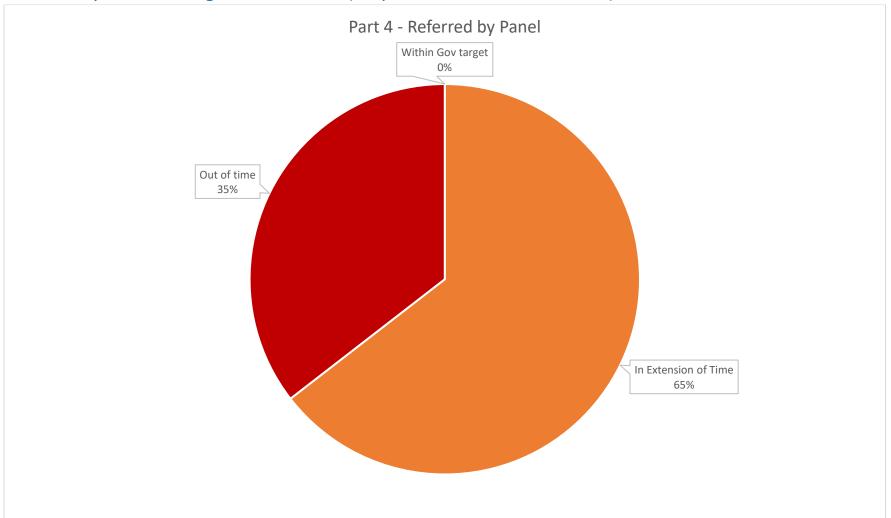
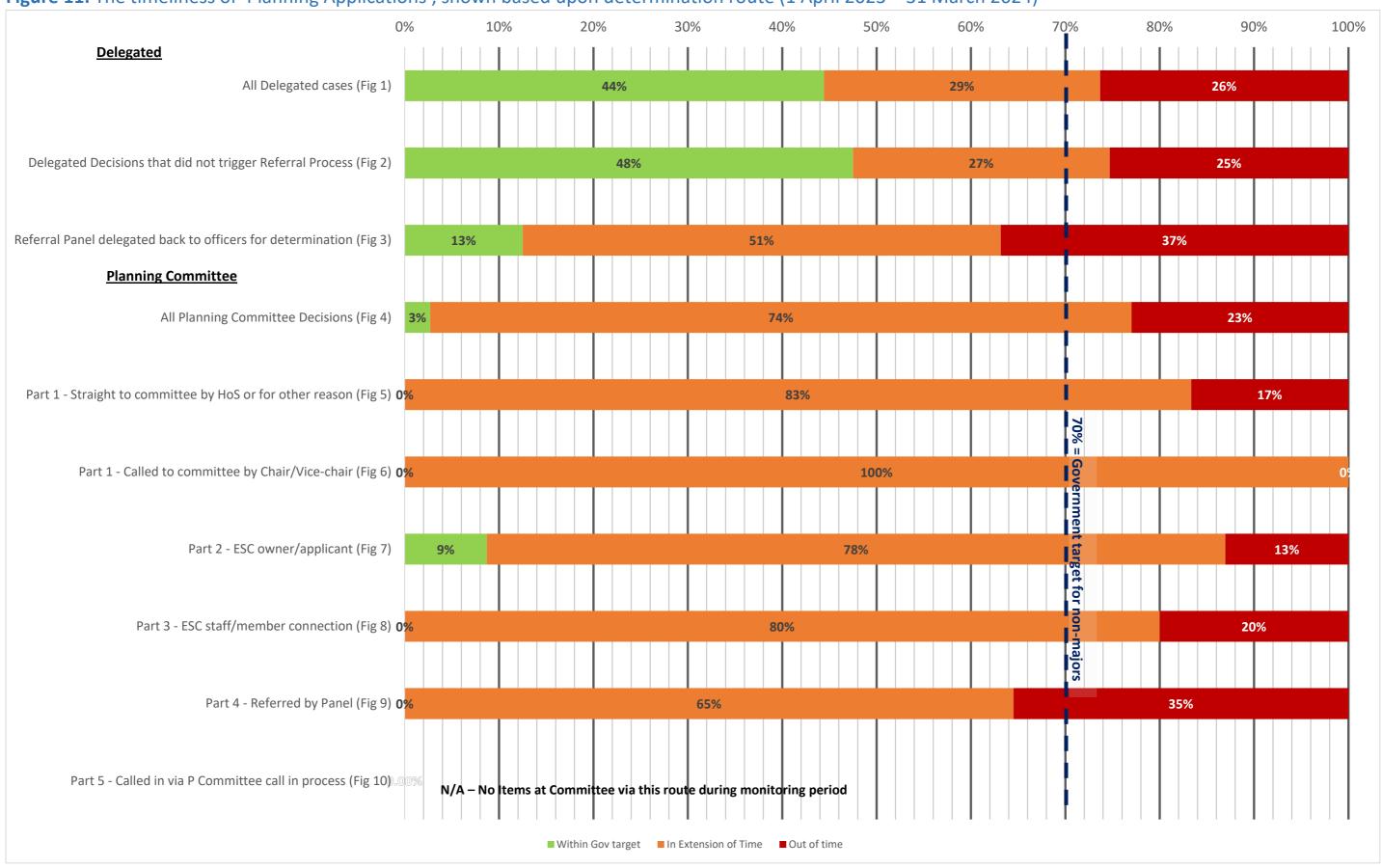


Figure 10: The timeliness of 'Planning Applications' determined at Planning Committee via the Planning Committee Call in Process (1 April 2023 – 31 March 2024)



Figure 11: The timeliness of 'Planning Applications', shown based upon determination route (1 April 2023 – 31 March 2024)





Committee	Strategic Planning Committee	
Date	08/07/2024	
Subject	Enforcement Performance Report – January to March 2024	
Cabinet Member	Councillor Kay Yule	
	Cabinet Member with responsibility for Planning and Coastal Management	
Report Author(s)	Cate Buck	
	Senior Planning & Enforcement Officer	
	cate.buck@eastsuffolk.gov.uk	
Head of Service	Ben Woolnough	
	Head of Planning, Building Control and Coastal Management	
	ben.woolnough@eastsuffolk.gov.uk	
Director	Nick Khan	
	Strategic Director - Strategic Management	
	Nick.khan@eastsuffolk.gov.uk	

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	Not Applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

To provide information on the performance of the enforcement section of the Development Management Team.

Recommendation(s)

That Strategic Planning Committee note the content of the report.

Strategic plan	
How does this proposal	support Our Direction 2028?
Environmental Impact	The statistics presented in this report are not directly appliable to this. However, it is recognised that resolving breaches of planning control can assist in reducing potentially harmful impacts upon the environment.
Sustainable Housing	The statistics presented in this report are not directly applicable to this. However, it is recognised that planning enforcement can be required to ensure that requirements of planning consents are complied with, including those relating to housing size and tenure mix, provision of community facilities areas such as public open space and connecting pathways etc, and the provision of appropriate provisions of renewable energy technology.
Tackling Inequalities	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors, no matter their personal circumstances.
Thriving Economy	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors, including the provision of buildings for employment uses, and supporting uses that add to vitality within district and town centres.
Our Foundations / governance of the organisation	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council, which provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors.

Although Planning Enforcement is technically a discretional function, it is required to ensure that the necessary planning consents are obtained and conditions/requirements of such consents are adhered to. Without an effective planning enforcement service there would be pressure for those within the district to comply with planning regulations, and the benefits to the environment, the economy and communities that arise from the application and consenting process would not necessarily be obtained.

Justification for recommendations

1. Background

1.1 Following the adoption of the new Local Enforcement Plan in March 2019 and the formation of the new East Suffolk Council section it was decided that a report be presented on a quarterly basis from August 2019, to present key statistics relating to the activities of the Planning Enforcement Team.

2. Introduction

- 2.1 This report provides details of key statistics relating to the activities of the Planning Enforcement Team between 1 January 2024 and 31 March 2024.
- 2.2 East Suffolk Council as Local Planning Authority is the authority responsible for the investigation of potential breaches of planning control and taking action (and determination when such action is appropriate).
- 2.3 The Planning Enforcement Team follows the adopted <u>East-Suffolk-Planning-Enforcement-Policy.pdf</u> (<u>eastsuffolk.gov.uk</u>), in terms of the way it priorities cases and the investigation processes it follows.
- 2.4 In determining whether or not there is a breach of planning control and if formal enforcement action should be undertaken, national legislation and regulations are followed.
- 2.5 A breach of planning control occurs when physical works or a change of use constitute 'development' and they are either not Permitted Development, not granted by a planning permission (and in some cases a Listed Building Consent or advertisement consent) and/or are in breach of the requirements of a condition on a planning permission or planning related consent.

3. Proposal

3.1 During this quarter (January to March 2024) there were the following number of Planning Enforcements cases received/logged and closed:

<u>Month</u>	Cases received/logged*	Cases closed
January	28	54
February	36	29
March	38	54
Total	102	137

^{*}Please note all new complaints are logged, site visited and then triaged in accord with the appropriate risk assessment.

3.2 As shown by the above table, a different number of cases were received/logged and closed during this period. It should be recognised that these are unlikely to be the same cases opened and closed during the same quarter due to the length of time that is

required for investigations and processes to resolve and/or close planning enforcement cases. However, the fact that the numbers in and out are broadly level is good, as it indicates that there is an equilibrium, indicating that the total number of cases on the books is not increasing significantly. Although the team is aware that there are a significant number of open older cases which they are continuing to work through to clear.

3.3 During the same quarter, the numbers of cases closed for each reason were:

Reason	<u>January</u>	<u>February</u>	<u>March</u>
No Breach	26	17	16
Compliance/use	8	2	9
ceased			
Planning	13	5	11
Permission Granted			
Permitted	1	0	1
Development			
Other Department	1	1	1
Withdrawn	0	0	0
De Minimus	5	1	4
Duplicate	0	3	1
Historic	0	0	11

- 3.4 It is interesting to note from the table above that during all three months the category with the highest number of closures was 'no breach'. This shows that a significant number of the reports made to the Planning Enforcement Team are not actually breaches of planning control. However, it should be noted that the team still has to investigate these cases, which requires significant time from the Enforcement Team, not only in terms of logging and acknowledging the complaint, but also in terms of direct investigation processes including site history checks, visiting the sites and various letters, emails and phone calls with site owners/operators and complainants. Often in such cases it also appears complainants are unwilling to accept that they are not breaches of planning control and/or that the Local Planning Authority therefore cannot take any action, so there is often further calls and emails after the cases are closed, creating significant additional work for officers.
- 3.5 A significant proportion of the cases were also closed during this quarter once planning permission was granted, which means there was a breach of planning control, but it was resolved by the granting of planning permission.
- 3.6 During the same quarter, the numbers of cases closed within different timescales were:

Time taken to	Cases Closed in	Cases Closed in	Cases Closed in
close cases	<u>January</u>	<u>February</u>	<u>March</u>
1-20 days	7	9	11
21-40 days	8	1	3
41-60 days	1	1	0
61-80 days	4	2	3
81 - 100 Days	3	1	1
<u> 101 – 120 Day</u>	1	2	3
<u>121 + Days</u>	30	13	33
<u>Total</u>	54	29	54

- 3.7 The above figures show that enforcement cases take a variety of time periods to investigate and close, which is to be expected, because every case is different in terms of the issues and complexity.
- 3.8 During this quarter the following notices were served by the Planning Enforcement Team:

Type of Notice	<u>Address</u>	<u>Breach</u>	<u>Compliance</u>
			<u>period</u>
Enforcement	2 Harbour Road,	Unauthorised first	4 months
Notice	Lowestoft	floor rear extension	
Enforcement	88 Bridge Road,	Change of use of the	4 months
Notice	Lowestoft	Residential Dwelling	
		from a single	
		residential unit to two	
		residential units used	
		for holiday letting	
		purposes	
Enforcement	12 Holland Road,	Without planning	4 months
Notice	Felixstowe	permission the	
		erection of a ground	
		floor rear extension	
		and air conditioning	
		unit.	

- 3.9 An appeal has been made to the Planning Inspectorate in relation to the enforcement notice at 88 Bridge Road, Lowestoft. However, we are yet to receive details of a start date or timetable for that appeal.
- 3.10 The enforcement notice at 12 Holland Road, Felixstowe, has also been appealed, and we are also yet to receive details of a start date or timetable for that appeal. However, a separate appeal decision was recently received in relation to the refusal of the planning application for the same development. That appeal was dismissed and is summarised in the Appendix to the Appeal Performance Report also on this meetings agenda. However, the Local Planning Authority is still unable to pursue compliance until the Planning Inspectorate issue their decision in relation to the Enforcement Notice.

4. Financial Implications

- 4.1 Planning Enforcement Notices can be appealed, and through that process the appellant can apply for costs. If the Local Planning Authority incorrectly serves notices, then costs can be awarded against the authority in favour of the appellant.
- 4.2 Therefore, careful consideration is given as to whether it is expedient to take formal planning enforcement action through the serving of notices, and those notices are carefully worded to ensure that they are accurate in their content and reasonable in terms of the requirements they place upon those they are served on.
- 4.3 If Planning Enforcement Notices are not complied with, the Local Planning Authority has to consider legal action to prosecute through the courts. Taking such action obviously has financial implications for the Local Authority. However, these are required in order to have an effective planning enforcement regime.

5. Legal Implications

- 5.1. There are no specific legal implications arising from the statistics presented in this report. However, it should be recognised that planning enforcement sits with the wider planning regulatory framework and those requirements must be accorded with.
- 5.2. Breaches of planning control can result in legal implications for the land/building owner and other parties with an interest in the land.
- 5.3. The Local Planning Authority has to follow certain legal processes in the way it investigates, considered and undertakes action against breaches, including not only the process by which it serves notices, but also ensuring that appropriate and sufficient evidence of the breach has been gathered, and that those in breach have been given sufficient opportunity to resolve the breach prior to formal action being taken.

6. Risk Implications

- 6.1. If the Local Planning Authority fails to investigate and take formal action if/when required, unauthorised development can become immune from enforcement action. However, the time periods for immunity in terms of breaches requiring planning permission are currently 4 years or 10 years (depending upon the breach), and therefore this time reduces the risk of such breaches becoming immune.
- 6.2. The team continues to seek to investigate and resolve or take action (if appropriate) on breaches of planning control as swiftly as possible whilst meeting the requirements of national legislation and according with the East-Suffolk-Planning-Enforcement-Policy.pdf (eastsuffolk.gov.uk).

7. Options

7.1. There aren't any options other than to continue to monitor the quarterly figures, and seek to address any potential issues if or as and when they arise.

8. Recommendations

8.1. That the report concerning Enforcement Team statistics is noted.

9. Reasons for Recommendations

9.1. That the report concerning Enforcement Team statistics be received

10. Conclusions/Next Steps

10.1. Strategic Planning Committee should continue to receive these quarterly monitoring reports.

Areas of consideration comments

Section 151 Officer comments:

The Section 151 Officer has received a copy of the report and has no further comments'

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Safeguarding:

There are no specific implications arising in terms of this matter from the statistics included within this report.

Crime and Disorder:

The majority of breaches of planning control are not criminal offences. However, some breaches such as unauthorised works to Listed Buildings and displaying an advertisement in contravention of the Advertisement Regulations are both a criminal offence. However, it still has to be expedient and in the public interest in order for such matters to be pursued by the Local Planning Authority.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Legal Services support the Planning Enforcement Team and are required in order to assist with and/or undertake elements of formal Planning Enforcement processes including reviewing enforcement notices and the process of prosecution through the courts.

Residents and Businesses consultation/consideration:

Not Applicable to the statistics presented in this report.

Appendices:

None

Background reference papers:		
Date	Туре	Available From
March	East Suffolk Council Local Planning	East-Suffolk-Planning-
2019	Enforcement Plan	Enforcement-Policy.pdf
		(eastsuffolk.gov.uk)



Committee	Strategic Planning Committee					
Date	08/07/2024					
Subject	Enforcement Improvement Action Plan Update					
Cabinet Member	Councillor Kay Yule					
	Cabinet Member with responsibility for Planning and Coastal Management					
Report Author(s)	Katherine Scott					
	Principal Planner (Technical Lead, Development Management)					
	Katherine.scott@eastsuffolk.gov.uk					
Head of Service	Ben Woolnough					
	Head of Planning, Building Control and Coastal Management					
	ben.woolnough@eastsuffolk.gov.uk					
Director	Nick Khan					
	Strategic Director - Strategic Management					
	Nick.khan@eastsuffolk.gov.uk					

Key Decision?	No
Is the report Open or Exempt?	OPEN

Category of Exempt	Not Applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	

Purpose/Summary

To provide an update on progress in relation to the Enforcement Improvement Action Plan.

Recommendation(s)

That the report concerning the Enforcement Improvement Action Plan is noted and that further reports are provided to update the Strategic Planning Committee regarding progress on an annual basis, but in the usual quarterly report any updates on progress will be provided and officers will be happy to take questions on those changes/progress.

That members of Strategic Planning Committee recognise and agree to overseeing the Actions in Appendix A, also being provided to the Audit and Governance Committee on 8th July 2024.

Strategic plan					
Environmental Impact	The information presented in this report are not directly appliable to this. However, it is recognised that resolving breaches of planning control can assist in reducing potentially harmful impacts upon the environment				
Sustainable Housing	The information presented in this report are not directly applicable to this. However, it is recognised that planning enforcement can be required to ensure that requirements of planning consents are complied with, including those relating to housing size and tenure mix, provision of community facilities areas such as public open space and connecting pathways etc, and the provision of appropriate provisions of renewable energy technology.				
Tackling Inequalities	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors, no matter their personal circumstances.				
Thriving Economy	The Planning Service and the determination of planning and planning related applications is a statutory function of the Council. It also provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors, including the provision of buildings for employment uses, and supporting uses that add to vitality within district and town centres.				

Our Foundations / governance of the organisation

The Planning Service and the determination of planning and planning related applications is a statutory function of the Council, which provides a vital mechanism through which improvements to the district can be secured for the benefit of residents, businesses and visitors.

Although Planning Enforcement is technically a discretional function, it is required to ensure that the necessary planning consents are obtained and conditions/requirements of such consents are adhered to.

Without an effective planning enforcement service there would be pressure for those within the district to comply with planning regulations, and the benefits to the environment, the economy and communities that arise from the application and consenting process would not necessarily be obtained.

Justification for recommendations

1. Background

- 1.1. This report provides details on the role and activities of Planning Enforcement at East Suffolk Council, the current situations and actions that are proposed to improve the way in which the service functions, providing an update on progress, since this matter was previously considered by Strategic Planning Committee in October 2022 (CMIS > Meetings).
- 1.2. The key points raised within this report have been identified through an Audit Report produced in 2018/19, comments raised by the Planning Committees, comments raised in the June 2021 Scrutiny Committee, and those raised in Audit Reports in 2022, and in more recent Audit and Governance Committees, and officer consideration of related matters/ways of improvement, both in relation to technical and operational processes.
- 1.3. There has been officer input into the attached Enforcement Improvement Action Plan (Appendix A) by officers in both Planning Services (particularly Planning Enforcement) and the ICT team who will be vital in facilitating a number of the changes proposed to the way in which software etc is utilised.
- 1.4. This report sets out the current position, progress made since 2022 and how we plan to further make improvements.

2. Introduction

2.1 In considering the role and activities of Planning Enforcement at East Suffolk Council, key consideration should be given to paragraph 59 of the NPPF which states:

"Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate."

- 2.2 Therefore, it is important that the enforcement team and its processes are supported with robust and effective processes and tools.
- 2.3 The findings of the Audit Report from 2018/19 were:
 - It remains the case that improvements to the use of software and monitoring, are required primarily the need to use the system software effectively to improve electronic and efficient working, and data quality concerns existed, with specific reference to:
 - o the enforcement module of Uniform is currently underutilised,

- Monitoring against the Enforcement Performance standards is not in place and there is doubt over whether the data inputted is sufficient to be relied upon in quarterly reports to members without manual checks, which means the service is unable to measure its own success,
- The 'access reports' that pull data from the system do not currently pull data for the last day of the month, so require manual adjustments to be made to quarterly reporting to Strategic Planning Committee,
- Accidently created duplicate cases cannot be closed off as such so on the rare occasions these are logged, they cannot be easily identified and/or removed from overall case numbers.
- Lack of formal review/signing off process prior to closer of cases.
 Reasons for closure and reasons for decision options within the uniform system do not align.
- 2.4 The report to Strategic Planning Committee in October 2022 identified and was laid out with 5 areas of action which are updated on below:
 - 1) Caseloads and resources
 - 2) Use of Software and digitisation
 - 3) Signing off Process
 - 4) Reporting of updates on cases to members
 - 5) Questions from members on enforcement cases
- 2.5 Further details on the various elements/steps which will contribute to the above areas of action are provided in **Appendix A.**

Caseloads and resources

- As set out in the Planning Performance Report which is also on this agenda to Strategic Planning Committee, and as illustrated in the graphs in **Appendix G** to that report, the Local Planning Authority continues to receive a significant number of reports of potential breaches of Planning Control, all of which have to be logged and investigated (in most cases including a site visit), even though once investigations have been made, a significant proportion turn out not to be breaches of planning control (**Appendix J** to the Planning Performance Report).
- 2.7 The process of logging every reported case and undertaking even simple investigations such as a site visit to establish what has taken place (or not taken place as the case may be), takes significant officer time. This means that often the process generally takes a few weeks to complete, even if there is no breach and the process runs smoothly, which in turn means that often even the simplest cases often cannot closed within the same month that they are received, and therefore these potentially simpler cases accumulate along with those that are more complex requiring longer investigations, more communication with site owners and complainants etc and potentially leading to formal action, meaning that the number of cases open at any one time is significant greater than the number of cases reported in that particular month.
- 2.8 Therefore, as part of the Enforcement Improvement Action Plan included in **Appendix A**, it is recommended that the current online reporting tool is reviewed and updated/rewritten, with an aim of directing customers to suitable alternative locations for matters that aren't planning enforcement issues, rather than allowing them to log a

complaint for such matters. This should also assist in managing expectations of such customers, rather than giving them false hope that Planning Enforcement can solve matters beyond its control such as civil disputes. Although it must be recognized that however this form is set up some customers will likely still report matters that aren't breaches of planning control, and a balance will need to be struck between the level of information required of customers to filter out the non-planning matters and accessibility of the form, because if the form is too onerous they will likely seek to report such breaches via email or phone, which will defeat the objectives.

- 2.9 Since the report to Strategic Planning Committee in October 2022 (<u>CMIS > Meetings</u>), an additional Assistant Enforcement Officer joined the team in September 2023. This additional team member and assignment to team areas has increased capacity within the Enforcement Team and enabled the alignment of the areas they each cover with Development Management Team Areas, i.e. the North, Central and South Teams.
- 2.10 As noted in the Planning Performance Report also on this meeting's agenda, between 1 April 2023 and 31 March 2024, there were 456 new planning enforcement cases logged and 495 planning enforcement cases were closed. Therefore, the team closed more cases than were received/created during this period. This will have included closing cases received during the previous financial year, but shows that the additional officer has provided additional capacity with the team to investigate and where appropriate close cases.
- 2.11 During the past year, a more proactive approach has been taken in relation to the monitoring and auditing of landscape implementation, with a member of the Landscape Team taking the lead on such matters on major developments by visiting and checking if all elements of approved landscaping schemes have been undertaken and identifying any missing, diseased or damaged planting. This has included an initial officer produced landscape audit followed by a responsive audit with actions being submitted by the developer. A number of such cases have now been resolved with replanting or agreed replanting plans and a programme of ongoing monitoring and this process is working well. This year the process will be better formalised with routine review reminders established.
- 2.12 Although outside Planning Services, it is noted that Legal Services has also filled their litigation lead lawyer position. This will create more capacity within that service area, which is a positive in terms of planning enforcement, as the Legal Services Team are involved in many steps of the process including providing legal advice, reviewing enforcement notices and proceeding with court action where appropriate.
- 2.13 In order to enable the Principal Planner Technical Lead to have more capacity to devote to the various aspects of the attached Enforcement Improvement Action Plan (Appendix A), the two Development Management Officers in her team have transferred to the relevant area teams, reducing her line management and associated responsibilities from 6 officers to 4. This will enable her to have a greater focus on improvements to the way in which the Enforcement Team is able to function, not only in terms of working with the ICT on the technical/software requirements/functionality but also in terms of the practical tasks and processes that have to be undertaken alongside.

- 2.14 Alongside this, changes have been made to the Planning Support Team in 2023 to create the 3 geographical area teams aligning with those for Development Management, and the recruitment of two additional Technical Officers. Those new officers have been trained and have now increased capacity in terms of administrative support for those within Planning Services including the ability to commence support for Planning Enforcement this year.
- 2.15 As set out in the attached Enforcement Improvement Action Plan, the intention is for planning support to undertake similar tasks for Enforcement Officers as they already do for Development Management Officers, such as indexing correspondence and other documents to the Document Management System, and in time once various other improvements have been made to the setup of the uniform software, including the setting up of templates for emails/letters, there may be scope for them to also assist with sending out notifications when cases are closed.
- 2.16 The best way in which to resource the other digital related actions outlined in **Appendix A**, is being explored. Whilst many of these actions can be completed using existing resources, it is likely that additional administrative resources are likely to be required to enable the transfer of historic data into the Idox document management system (DMS).
- 2.17 In order to support the existing team of enforcement officers, it is also appropriate to seek to create an additional Assistant Enforcement or Enforcement Planner level position with a focus on visual amenity and street scene. This would take some lead from the 'East Suffolk's Amazing' campaign and the emerging East Suffolk Environment Impact Plan. They will focus specifically on advertisements and shopfronts, to support the enhancement project within the Historic Action Zones and complement the recent shopfront funding initiative whilst also tackling opportunistic advertisements in the countryside, such as those along the A12, which may well increase with Sizewell C construction. They will also have a second element in supporting and assisting with investigating reports to Building Control of unauthorised building works. This will further our collaborative working across teams in the service.
- 2.18 This new position would reduce the caseloads of the existing officers, allowing them more time to focus on other cases within their geographical patches. However, the usual recruitment processes will need to be followed and a business case made for a new position.
- 2.19 In summary, the addition of a further Enforcement Officer has been beneficial in terms of the overall number of Enforcement cases closed. The Planning Support Team are going to assist Planning Enforcement with indexing documents etc, which will enable documents to be added straight into the DMS, and free up enforcement officer. It is recommended that additional resource is added to the planning service in the form of an additional officer within the enforcement team, who would have a focus on shopfronts and advertisements, but also an overlapping role with Building Control.

Use of Software and digitisation

2.20 The potential benefits of greater utilisation of the uniform and associated software are recognised by officers, and therefore as set out in **Appendix A**, a variety of ways in which

the software can be utilised have been identified, including various aspects of uniform itself, utilisation of the DMS for document storage, and use of enterprise to manage caseloads etc. This is provided in response to the remaining Audit actions and is also being provided to the Audit and Governance Committee on 8th July 2024 recommending that the remaining Audit actions are closed and that Strategic Planning Committee is recognised in overseeing these to conclusion, as per this report.

- 2.21 However, officers also recognise that setting up the means by which these processes can be implemented is likely to require significant work both in terms of technical set up but also in terms of setting up processes outside of the software.
- 2.22 It is also recognised that a number of the action points for increased utilisation of software and digitisation are interlinked and co-dependent so they will potentially need to be undertaken co-currently (although at different rates).
- 2.23 It must also be recognised that whilst better use of uniform and associated software can have significant benefits and potential efficiencies in the longer term, setting these things up will likely take significant officer time.
- 2.24 It is also acknowledged that the benefits will not necessarily show in terms of significant changes in numerical figures for cases opened/closed etc, but will more likely be beneficial in terms of the way in which officers are able to access information, and undertake various tasks including during direct interaction with customers, etc.
- 2.25 Alongside the software related improvements, tablets are currently being trialled for site visits and software for remote site access to plans and application information has been developed. The intention is to roll them out to all Development Management and Planning Enforcement Officers later in the year. Whilst the full potential for enforcement officers will not be realised until the other software and data improvements have been completed, these tablets will still enable enforcement officers to download data on to the tablets so it is accessible to them during their visits. The use of these tablets will therefore enable them to check measurements etc against the approved plans and check planning histories and constraints whilst on site, rather than to either take a paper copy or consult the plans at a later date. The professional impression this will present of Council Officers undertaking their work will be considerably elevated alongside the efficiencies gained.

Signing off Process

- 2.26 In order for the signing off process to function technically, it must be set up so that ensures that case files pass smoothly within the uniform database system from the case officer to a reviewing officer and then on to an officer to send out notifications of the outcome etc, and that the process is set up so that electronic case files cannot go estray, appropriate trigger points/electronic mechanisms for case files to transfer need to be identified, and set up within the software.
- 2.27 Those trigger points and file transfers must be set up in a way that ensures that files follow a correct process route and those triggers do not have knock on effects upon other automated processes within the uniform software, or other aspects of the way the

team has to function. Therefore, they will need to form part of the process mapping identified by officers and set out in the section above, as being required for the whole enforcement case processes in order to assist with ensuring that better use is being made of the uniform and associated software.

- 2.28 Until it is possible to introduce that technical solution within the system, enforcement officers will continue to discuss and agree the outcomes of cases with the Senior Enforcement Officer and/or the Principal Planner (Technical Lead), prior to closing or otherwise proceeding with action on cases.
- 2.29 Such discussions will still continue via teams calls and meetings once we have the technical software solution in place to ensure that we have consistency and agreement of any formal action or closure of cases, but the software solution will provide a formal auditable electronic 'paper trail' alongside.

Reporting of updates on cases to members

- 2.30 It was recognised in the October 2022 report that the way in which "East Suffolk Enforcement Action Case Update" report to Planning Committees was set out, which resulted in the information on some cases stretching across several pages and it wasn't always immediately clear on what the current status and/or latest action on a case was.
- 2.31 Following that report, a new template for Enforcement Action Case Update reports to the North and South Planning Committee's was introduced for the North and South Planning Committees in July 2022 and has been in use since that time. It has a different layout from the previous report template, and is split into sections, each of which relate to applications with a particular status i.e. those we have served notice on that are within the compliance period, those that are the subject of an appeal etc.
- 2.32 It is noted based upon comments from some members at some committee meeting that they would like more information on certain cases. There is a limit as to level of information that can be published or reported in a public forum such as a Planning Committee meeting, as to reveal certain information could prejudice any subsequent formal or legal action and/or mean that others are aware of details relating to an enforcement case prior to the owners/developers of a site.
- 2.33 However, it is recognised that there are ways in which further details can potentially be provided on the potential next steps/process that could following if legal action is deemed necessary and potential timescales for such action if it is deemed necessary, in the form of a 'potential next steps and consequences' summary.
- 2.34 Officers will need to take care to not reveal personal/sensitive information, and they will also need to be carefully worked to ensure that they are not confirming legal action is being taken until that action has actually commenced, because otherwise it would be stated in a public forum that legal action is being taken prior to the landowner/developer being aware, which would be unfair on those individuals. Going forward, Enforcement Update Reports will have direct Legal team contribution in their drafting to ensure opportunities to expand the explanation of progress and process are maximised.

- 2.35 However, if a ward member would like additional information on a particular case, they should contact the enforcement officer for that case (as per the next section of this report). The case officer may be able to provide them with further information in confidence, outside of the public forum of a Planning Committee Meeting.
- 2.36 In summary, the new report template for case summaries was introduced in July 2022, and is working well, but could be improved with more details on what could happen once cases are passed to legal services. Therefore, the intention is to provide a 'potential next steps and consequences' summary as outlined above.

Questions from members on enforcement cases

- 2.37 The October 2022 report to Strategic Planning Committee highlighted that officers had concerns regarding some of the questions that were being asked during Planning Committee meetings, in relation to cases that were under investigation but were not at a point of any formal action and therefore not included on the Enforcement Action Case Update Reports.
- 2.38 As explained in the October 2022 report:
 - whilst the members wish for an update on such cases recognised, the information
 provided in a public forum such as Planning Committee, has to be carefully
 considered in a sensitive manner. In some circumstances, particularly if a case has
 only recently been received/logged, contact with the site or property owner may
 not have been made and therefore they may not be aware that there is a
 potential issue, prior to it being raised in this public forum.
 - Discussing cases that are not in the Enforcement Report could also result in data protection breaches, as details can be revealed that should not be in the public domain, particularly when reference is made to named individuals and/or their addresses. Other potentially sensitive data can also be revealed which should not be discussed in a public forum, on cases at all stages of investigation.
 - It should also be recognised that if certain details are revealed about a case. it can
 potentially affect how any action can proceed, particularly if we reveal that formal
 action is about to take place or that certain legal advice on how to proceed has
 been received. Therefore, officers are limited in what information they can
 provide in such a forum.
- 2.39 As part of the October 2022 a new protocol was introduced for members raising queries on enforcement cases (attached as Appendix B to that report CMIS > Meetings). That was circulated to all members within a few days of that meeting.
- 2.40 Since the introduction of that process, there have been no problems noted. However, requests have been received from Ward Members and Town/Parish Councils for more comprehensive updates on cases in their area. This can create significant challenges, not only in terms of officer time to collate the information, but also on ensuring that the

information shared does not result in data protection breaches and/or a breach of the policy to keep the identity of the compliant confidential (as set out within the adopted East-Suffolk-Planning-Enforcement-Policy.pdf (eastsuffolk.gov.uk) and/or the sharing of information which may prejudice any potential future legal action.

2.41 However, it is recognised that there are potential opportunities for keeping Ward Members and Town/Parish Councils updated on cases. The proposed changes to the uniform and related software (including the DMS) will ensure the data is better organised and more accessible to officers, making it easier for them to provide updates. Officers will produce a template for sharing information on live investigations within a specific area for Members or Town/Parish Councils, ensuring it is informative whilst also protecting the confidentiality and sensitivities of the process.

3. Proposal

3.1 It is recommended that the content of this report and the recommendations outlined in the attached action plan (**Appendix A**) for continued improvements to the Planning Enforcement Service are noted, and support is provided to its implementation.

4. Financial Implications

- 4.1 The resources required for the digital improvements outlined in the plan can largely be covered by the existing teams, with the potential exception of the digitisation of older documents/records.
- 4.2 However, for the additional resources outlined above for the other actions, additional resourcing is likely to be required. A business case will need to be made for all additional resources and budget requirements. That lies outside the scope of the Strategic Planning Committee and will follow the usual organisational processes.

5. Legal Implications

- 5.1. There are no specific legal implications arising from the information presented in this report. However, it should be recognised that planning enforcement sits with the wider planning regulatory framework and those requirements must be accorded with.
- 5.2. Breaches of planning control can result in legal implications for the land/building owner and other parties with an interest in the land.
- 5.3. The Local Planning Authority has to follow certain legal processes in the way it investigates, considers and undertakes action against breaches, including not only the process by which it serves notices, but also ensuring that appropriate and sufficient evidence of the breach has been gathered, and that those in breach have been given sufficient opportunity to resolve the breach prior to formal action being taken.

6. Risk Implications

6.1. If the Local Planning Authority fails to investigate and take formal action if/when required, unauthorised development can become immune from enforcement action.

However, the time periods for immunity in terms of breaches requiring planning permission are currently 4 years or 10 years (depending upon the breach), and therefore this time reduces the risk of such breaches becoming immune.

6.2. The team continues to seek to investigate and resolve or take action (if appropriate) on breaches of planning control as swiftly as possible whilst meeting the requirements of national legislation and according with the East-Suffolk-Planning-Enforcement-Policy.pdf (eastsuffolk.gov.uk).

7. Options

- 7.1. One option would be to only undertake the actions required in order to meet the findings of the original audit report. However, this would result in a piecemeal type approach and would be a wasted opportunity. Such limited actions/changes would be of limited benefit in the longer term in terms of the way in which the Enforcement Team is able to utilise the software and the way it can function in order to register, investigate, service notices when required and/or close cases as no breach etc as appropriate.
- 7.2. The additional changes identified by officers and added to the Enforcement Improvement Action Plan would enable various improvements including potential benefits related to some of the issues raised by members in committee meetings since the initial audit process from 2018/2019 (i.e. those which are not part of the formal audit action points).
- 7.3. Therefore, the only realistic option is to progress with the Enforcement Improvement Action Plan, including the various matters that go beyond the scope of the findings of the previous Audit.

8. Recommendations

- 8.1. That the report concerning the Enforcement Improvement Action Plan is noted and that further reports are provided to update the Strategic Planning Committee regarding progress on an annual basis, but in the usual quarterly report any updates on progress will be provided and officers will be happy to take questions on those changes/progress.
- 8.2. That members of Strategic Planning Committee recognise and agree to overseeing the Actions in **Appendix A**, also being provided to the Audit and Governance Committee on 8th July 2024.

9. Reasons for Recommendations

9.1. That the report concerning Enforcement Improvement Action Plan be received.

10. Conclusions/Next Steps

10.1. Strategic Planning Committee should note the report regarding the Enforcement Improvement Action Plan and allow officers to progress with the continued development and implementation of the various action points identified within it.

Areas of consideration comments

Section 151 Officer comments:

The Section 151 Officer has received a copy of the report and has no further comments'

Monitoring Officer comments:

The Monitoring Officer has been consulted on this report and has no additional comments.

Equality, Diversity and Inclusion/EQIA:

There are no specific implications arising in terms of this matter from the information included within this report.

Safeguarding:

There are no specific implications arising in terms of this matter from the information included within this report.

Crime and Disorder:

The majority of breaches of planning control are not criminal offences. However, some breaches such as unauthorised works to Listed Buildings and displaying an advertisement in contravention of the Advertisement Regulations are both a criminal offence. However, it still has to be expedient and in the public interest in order for such matters to be pursued by the Local Planning Authority.

Corporate Services implications:

(i.e., Legal, Finance, Procurement, Human Resources, Digital, Customer Services, Asset Management)

Legal Services support the Planning Enforcement Team and are required in order to assist with and/or undertake elements of formal Planning Enforcement processes including reviewing enforcement notices and the process of prosecution through the courts.

Residents and Businesses consultation/consideration:

Not Applicable to the information presented in this report.

Appendices:

Appendix A | Enforcement Improvement Action Plan

Background reference papers:				
Date	Туре	Available From		
March 2019	East Suffolk Council Local Planning	East-Suffolk-Planning-		
	Enforcement Plan	Enforcement-Policy.pdf		
		(eastsuffolk.gov.uk)		

10 October	Proposals to Improve the Delivery and	CMIS > Meetings
2022	Performance Monitoring of Planning	
	Enforcement at East Suffolk Council	
	(Strategic Planning Committee)	
10 October	Minutes	CMIS > Meetings
2022	(Strategic Planning Committee)	

Appendix A: Enforcement Improvement Action Plan

	Action	What this involves	Resource required	Date for completion	How we will know this is complete	Risks of not delivering this action
A	Improvement of data held within the uniform system:	This will involve both reviewing existing data within the system, and ensuring that new data added to the system is added appropriately, with sufficient detail and kept up to date etc.	This is a change in process which also requires a degree of awareness of the cases being reviewed. It will need to be led by existing enforcement officers so will impact time available for investigations and action on cases. In the longer term this will be beneficial to officer time.	December 2025	All current and historic cases will be stored in the same way.	Risk of data inconsistency and quality and longer term impacts on officer time.
В	Use of Idox DMS to store all documents linked to enforcement cases	This will require the indexing of a significant number of documents held elsewhere into the DMS so that they are all accessible/held together.	Subject to system changes, the new process can be utilised within 6 months through existing officers. For historic cases, well informed data processing resource to be secured.	June 2025	For all new cases, comparable function in respect of all document access will exist for enforcement records to match that of planning applications.	Risk of data inconsistency and quality and longer term impacts on officer time.
С	Creation of templates to produce documentation from within uniform	Templates can be created within the uniform system for various commonly used document such as letters and notices. They can be set to automatically complete with data held within the database e.g. site address, case reference number, description of potential breach etc, and once these templates are set up and in use, they would speed up the production/ drafting of such documents, assisting staff.	These will need to be produced collaboratively between enforcement officers, the digital team, planning support and legal.	December 2024	Templates of notices and letters will generate through Uniform with ease.	Increased officer time and inconsistency in the quality of documents produced.
D	Use of Idox Enterprise to manage workflow and case management	The Enterprise software is integrated with uniform, so it can be set to display lists of various tasks in order of priority based upon variables such as number of days to a deadline or since an event occurred (i.e. trigger points). However, prior to being about to utilise this software the trigger points will need to be determined, and they are reliant upon a change in process in the way in which the uniform software is currently being utilised	Not a significant resource requirement but it depends upon Action A	December 2025	The enterprise function of Uniform will be populated and usable by enforcement officers.	Poorer performance and delays in enforcement decision making.

Appendix A: Enforcement Improvement Action Plan

E	Use of Idox Enterprise linked tools to produce statistical information and managerial reports	The Enterprise software linked tools can be set to automatically extract and collate data on cases stored within the uniform system, in order to produce statistic information, which can then be analysed as part of monitoring caseload levels of the team, and the 'performance' data currently manually extracted and included in the quarterly reports to Strategic Planning Committee.	This depends on Action A and requires focussed resource from the digital team.	December 2025	Reports will be available on demand to officers and managers	A reduced ability to appraise workloads and efficiency. Lower fulfilment for officers in achieving targets. Poorer service outcomes.
F	Use of Idox Public Access to publish statutory registers	The Statutory Register includes copies of all notices served in the district, and is currently held in paper form in secure storage. The Public Access system currently used to publish planning applications on the ESC website can be utilised to publish such documents.	This depends on Action A. It may be possible to populate the Statutory Register through this new method for current/recent cases first and therefore a phased introduction may be possible.	June 2025- December 2025	Statutory registers will all be accessible through Public Access and linked with property history.	Increased officer time and inconsistency in the quality of public data. Risk of legal challenge
G	Use of Idox Mobile App to allow off site working and access to case documents	These tablets will enable enforcement officers to access constraints data that could affect permitted development rights (i.e. see if a site is a Conservation Area or other designation) and download copies of relevant plans etc from previous relevant planning applications, and have them on hand on the tablet to refer to when looking at potential breaches of planning control onsite.	The resource demands are largely concluded but it is in testing stage requiring the time of users and the Digital team to ensure optimal functioning. Early use will require manager attention to ensure officers maximise the benefits of this tool.	December 2024	Officers will have tablets and full access to cases whilst on site.	Poor access to data in the field. Customer impression of professionalism. Wasted officer time