

## East Suffolk House, Riduna Park, Station Road, Melton, Woodbridge, Suffolk, IP12 1RT

# Strategic Planning Committee

#### **Members:**

Councillor Debbie McCallum (Chairman)

Councillor Paul Ashdown (Vice-Chairman)

Councillor David Beavan

Councillor Stuart Bird

Councillor Chris Blundell

Councillor Norman Brooks

Councillor Jenny Ceresa

Councillor Tony Cooper

Councillor Linda Coulam

Councillor Tom Dalv

Councillor Mike Deacon

Councillor Andree Gee

Councillor Colin Hedglev

Councillor Mark Newton

Councillor Malcolm Pitchers

Councillor David Ritchie

Councillor Craig Rivett

Councillor Kay Yule

Members are invited to a **Meeting of the Strategic Planning Committee** to be held in the Deben Conference Room, East Suffolk House, on **Monday, 13 December 2021** at **10.30am** 

This meeting is being held in person in order to comply with the Local Government Act 1972. In order to comply with East Suffolk Council's coronavirus arrangements and guidance, the number of people at this meeting will have to be restricted to only those whose attendance is reasonably necessary.

Ordinarily, East Suffolk Council encourages members of the public to attend its meetings but on this occasion would encourage the public to watch the

# livestream, via the East Suffolk Council YouTube channel instead at https://youtu.be/nhEpLJVMm-U

If you do believe it is necessary for you to be in attendance we encourage you to notify Democratic Services, by email to <a href="mailto:democraticservices@eastsuffolk.gov.uk">democraticservices@eastsuffolk.gov.uk</a>, of your intention to do so no later than 12 noon on the working day before the meeting so that the meeting can be managed in a COVID secure way and the Team can endeavour to accommodate you and advise of the necessary health and safety precautions.

However, we are not able to guarantee you a space/seat and you are advised that it may be that, regrettably, we are not able to admit you to the meeting room.

An Agenda is set out below.

#### Part One - Open to the Public

**Pages** 

#### 1 Apologies for Absence and Substitutions

#### 2 Declarations of Interest

Members and Officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests 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.

3 Minutes 1 - 16

To confirm as a correct record the Minutes of the Meeting held on 4 October 2021

#### 4 Energy Projects Update

To receive a presentation from the Deputy Leader and Cabinet Member with responsibility for Economic Development on Energy Projects within East Suffolk

#### 5 Authority Monitoring Report 2020/21 ES/0967

**17 - 147** 

Report of the Cabinet Member with responsibility for Planning and Coastal Management

#### 6 Planning Policy and Delivery Update ES/0968

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Report of the Cabinet Member with responsibility for Planning and Coastal Management

## 7 Enforcement Performance Report - July to September 2021 ES/0969

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Report of the Cabinet Member with responsibility for Planning and Coastal Management

8 Planning Performance Report - July to September 2021 ES/0970

160 - 168

Report of the Cabinet Member with responsibility for Planning and Coastal Management

9 Appeals Performance Report - 20 September to 1 December 2021 16ES/0971

169 - 181

Report of the Cabinet Member with responsibility for Planning and Coastal Management

10 Strategic Planning Committee's Forward Work Programme

To consider the Committee's Forward Work Programme

#### Part Two - Exempt/Confidential

**Pages** 

There are no Exempt or Confidential items for this Agenda.

#### Close

Stephen Baker, Chief Executive

#### Filming, Videoing, Photography and Audio Recording at Council Meetings

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#### **Unconfirmed**



Minutes of a Meeting of the **Strategic Planning Committee** held in the Deben Conference Room, East Suffolk House, on **Monday, 4 October 2021** at **10.30am** 

#### Members of the Committee present:

Councillor Paul Ashdown, Councillor David Beavan, Councillor Stuart Bird, Councillor Chris Blundell, Councillor Norman Brooks, Councillor Jenny Ceresa, Councillor Tony Cooper, Councillor Linda Coulam, Councillor Mike Deacon, Councillor Andree Gee, Councillor Malcolm Pitchers, Councillor David Ritchie, Councillor Craig Rivett, Councillor Kay Yule

#### **Other Members present:**

Councillor Peter Byatt, Councillor Russ Rainger

**Officers present:** Sarah Carter (Democratic Services Officer), Karen Cook (Democratic Services Manager), Bethany Rance (Graduate Planner, Energy Projects), Philip Ridley (Head of Planning and Coastal Management), Desi Reed (Planning Policy and Delivery Manager), Grahame Stuteley (Senior Energy Projects Officer), Anthony Taylor (Senior Planner), Ben Woolnough (Planning Development Manager)

#### 1 Apologies for Absence and Substitutions

Apologies for absence were received from Councillors Daly, Hedgley, McCallum and Newton.

Councillor Fisher attended the meeting as a substitute for Councillor Daly.

In the absence of the Chairman, the Vice-Chairman Councillor Paul Ashdown chaired the meeting.

#### 2 Declarations of Interest

There were no Declarations of Interest.

#### 3 Declarations of Lobbying and Responses to Lobbying

Councillor Ashdown declared that he had been lobbied on Item 5 - DC/21/1001/FUL - Land to the North and South of New Road, Parham. He had made no response.

Councillor Beavan declared that he had been lobbied on Item 5 - DC/21/1001/FUL - Land to the North and South of New Road, Parham. He had made no response.

Councillor Bird declared that he had been lobbied on Item 5 - DC/21/1001/FUL - Land to the North and South of New Road, Parham. He had made no response.

Councillor Deacon declared that he had been lobbied on Item 5 - DC/21/1001/FUL - Land to the North and South of New Road, Parham. He had made no response.

Councillor Pitchers declared that he had been lobbied on Item 5 - DC/21/1001/FUL - Land to the North and South of New Road, Parham. He had made no response.

#### 4 Minutes

#### **RESOLVED**

That the minutes of the meeting held on 7 June 2021 be agreed as a correct record and signed by the Chairman.

## 5 DC/21/1001/FUL - Land to the north and south of New Road, East of Silverlace Green, Parham

The Committee considered report ES/0903 which gave details of the planning application for the construction and operation of a solar farm together with associated works, equipment and necessary infrastructure on land to the north and south of New Road, East of Silverlace Green, Parham. The proposed solar farm consisted of ground mounted photovoltaic (PV) panels which would cover six fields with a total land area of 73.95 hectares currently in agricultural use. The propose solar farm would generate up to 49.9MW of electricity which equated to the power consumption of approximately 16,581 homes and would result in a saving of approximately 11,210 tonnes of CO2 per annum.

The Senior Energy Projects Officer advised that the application was before Committee because of the scale of the development proposed, the strategic nature of the proposal and the importance of low carbon and renewable energy for East Suffolk. There had been significant public interest in the site which bordered Framlingham and Wickham Market and included the parishes of Parham, Great Glemham and Marlesford. His presentation covered:

- Site location plan, including district ward and parish boundaries.
- The proposal and development zones.
- Baseline environment, landscape designs and public rights of way.
- Visual context from four different viewpoints including photomontage of baseline, year 1 and year 15.
- Artist's impressions of the solar panels, inverters and transformers.
- Location of DNO and Customer substation buildings on-site, security fencing and CCTV

#### cameras.

- The cable connection route.

The Senior Energy Projects Officer explained in detail the material planning considerations including the landscape visual impact, biodiversity, ecology, heritage and conservation, archaeology, surface water drainage and flood risk, highways/access/traffic generation, and noise and residential amenity. He highlighted the need case and principle of development and the fact that the UK Government had made a legally binding target of net zero by 2050 within the Climate Change Act 2008. The principle of low carbon and renewable energy development was well established within both National and Local Planning Policy and Guidance. Applications for renewable energy schemes within East Suffolk should be supported in line with Local Plan policy requirements for low carbon and renewable energy projects. Appropriate weight had therefore been given to the positive contribution that the development would make and approval was therefore being recommended.

The Chairman invited questions.

Members sought clarification of the route of the cable from the site to the main grid, if the land would be used for grazing once developed, any increase in biodiversity and views of the panels from nearby villages. The Senior Energy Projects Officer displayed slide 13 of the presentation which gave an indication of the cable route and he confirmed the gap between the panels and the perimeter fence would allow livestock to graze. There would be no lighting at night. There would be some partial views of the panels once installed but the opinion of the Landscape Officer was that there would be no visual impact after 7-10 years.

The Chairman invited public speakers to address the Committee.

As an objector, Mr B Pearson advised that he lived less than 200m from the north eastern boundary and was the closest resident to the proposed development. Having moved to the area for the countryside and tranquillity, he was devastated to find such a large development on an upward slope was being proposed. The 3m panels would be much higher than necessary, looking like a military parade of straight lines. The pole mounted CCTV and fencing was unnatural in the landscape and the area of development should be reduced to lessen the impact and reduce the noise. Consideration should also be given to reducing the height of the panels in line with the existing solar farm so that if it went ahead, impacts were minimal.

On behalf of the Applicant, Mr J Hartley-Bond advised that mediation had taken place to try and resolve concerns and, in his opinion, that had been undertaken satisfactorily. They had worked with local residents and would be planting more landscaping to help reduce any impact on the low number of affected residents. There had been only three objections and one supporter and 67% positive views had been expressed through the consultation undertaken. Parham Parish Council supported the proposal and Great Glemham had removed its holding objection. If approval was granted, it was hoped to have a good working relationship for the next 40 years. With the current climate and energy crises, this proposal addressed both issues. Mr Hartley-Bond asked that the Committee supported the officer's recommendation and approve the application.

Members asked questions relating to:

- The height of the panels being reduce to 1.8m from 3m.
- The cement being used for the development.
- Location of the cable connections.
- Grazing on the site.
- If the angle of the panels were variable.

Mr Hartley-Bond advised that 3m would allow optimisation of the site and therefore maximise the power produced from the site. Cement would only be used on the converters and the lampposts as the panels would be driven directly into the ground with the cables inside the solar farm being buried. The proposal would maximise the areas of green space and therefore allow grazing. The angle would not be variable as tracker panels were not deployed in the UK.

During debate, Members commented on the proposed height of the panels and a reduction would reduce the effect on the landscape. Whilst there was a need to produce renewable power in the country, the environment should be respected. Whilst supporting solar power because of the Government's target to reduce CO2 and the Council's declared statement on climate emergency, Members recognised the need to ensure minimal impact on the environment and residents.

Following a proposal for approval which was duly seconded, it was

#### **RESOLVED**

That planning permission be granted, subject to the following conditions:

1. The development to which this permission relates shall be begun no later than three years from the date of this planning permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

2. The development hereby permitted shall be completed in all respects in accordance with the submitted drawings ref: SP-01 Rev 06 - Site Location Plan; SD-17 Rev 01 - Panel Arrangement; SD-16 Rev 01 - Inverter Floor Plan; SD-15 Rev 01 - Customer Substation Floor Plan; SD-08 Rev 02 - Inverter Elevations and Dimensions Plan; SD-04 Rev 02 - Security Fence and CCTV; SD-03 Rev 01 - Indicative CCTV Post; SD-02 Rev 02 - Customer Substation Elevations and Dimensions Plan; SD-01 Rev 02 - DNO Substation Elevations and Dimension Plan; SD-01 Rev 01 - DNO Substation Floor Plan; PLE-02 Rev 03 - Layout Plan External; PLE-01 Rev 10 - Layout Plan External; DZ-01 Rev 13 - Development Zone Plan, noting that the precise layout is not yet fixed and will be agreed post-development by condition, being governed by the agreed parameters within each development zone/parcel.

Reason: To secure a properly planned development based on development parcels/zones which allow for flexibility in the precise layout within the agreed parameters for each development parcel.

3. The planning permission is for a period from the date of this permission until the

date occurring 40 years after the date of commissioning of the development. Written confirmation of the date of commissioning of the development shall be provided to the Local Planning Authority no later than 1 calendar month after that event.

Reason: To ensure this permission is a temporary development on the landscape, having an operational life of 40 years.

4. If the solar farm hereby permitted ceases to operate for a continuous period of 6 months, then unless otherwise agreed in writing by the Local Planning Authority, a scheme for the decommissioning and removal of the panels and any other ancillary equipment, shall be submitted to and agreed in writing by the Planning Authority within 3 months of the end of the cessation period. The scheme shall include details for the restoration of the site. The scheme shall be implemented within 12 months of the date of its agreement by the Local Planning Authority.

Reason: To remove the non-operational development from the landscape.

5. At the end of the operational lifespan (40 years), the solar panels and other infrastructure will be removed, and the site restored back to full agricultural use.

Reason: The decommissioning and restoration process intends to restore the land to the same quality as it was prior to the development taking place.

#### **Archaeology Conditions**

6. Part 1 - No development shall take place within the area indicated [the whole site] until a programme of archaeological work has been secured and implemented, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording;
- b. The programme for post investigation assessment;
- c. Provision to be made for analysis of the site investigation and recording;
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation;
- e. Provision to be made for archive deposition of the analysis and records of the site investigation;
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation;
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.
- Part 2 The solar farm shall not be brought into operation until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Part 1 of this condition, and the provision made for analysis, publication and dissemination of results and archive

deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy SCLP11.7 of Suffolk Coastal Local Plan (2020) and the National Planning Policy Framework (2019).

INFORMATIVE: The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

7. Part 1 – Prior to any development on site commencing, a detailed site plan including Archaeological Exclusion Zones will be submitted to and approved by the Local Planning Authority. Following the approval and completion of the archaeological evaluation referred to in Condition 6, and prior to the commencement of development, a final detailed site layout plan with full details of the final locations, design and materials to be used for the panel arrays, inverters, customer switchgear, substations, CCTV cameras, fencing, foundations and cabling will be submitted for approval.

Should the archaeological evaluation identify any significant archaeological deposits, the final detailed site layout plan will define archaeological exclusion zones within which below and above ground development will be excluded or provide sufficient design mitigation including but not limited to the use of above ground cables, concrete shoes or other means to avoid any impact on archaeological deposits if required.

The final detailed site layout plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the County Council's Lead Archaeologist. Subsequently the development shall be carried out in accordance with the approved details.

Part 2 - If there are archaeological areas to be preserved in situ, a management plan will be produced for any archaeological areas to be preserved in situ, setting out the methodology to secure the ongoing protection of these areas both during construction, operation and decommissioning of the solar farm.

Reason: To ensure that trial trenched evaluation is undertaken at the earliest opportunity post consent to establish the archaeological potential of the site in order that any mitigation requirements can be defined at an early stage.

INFORMATIVE: This condition is in accordance with the National Planning Policy Framework Paragraph 205 (formerly 199), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

#### **Highways Conditions**

8. No part of the development shall be commenced until details of the improved accesses as indicatively shown on drawing numbers B17SF\_SPPSA1, B17SF\_SPPSA1R, B17SF\_SPPSA2R (including the position of any gates to be erected)

have been submitted to and approved in writing by the Local Planning Authority. The approved accesses shall be laid out and constructed in their entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form unless agreed in writing by the Local Planning Authority.

Reason: To ensure that the accesses are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

9. Before the development is commenced, details shall be submitted to and approved in writing by the Local Planning Authority showing the interim means to prevent the discharge of surface water from the development onto the highway during the construction process. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form. The longer term drainage solution will be approved and implemented in accordance with details submitted, agreed and implemented for condition 18.

Reason: To prevent hazards caused by flowing water or ice on the highway.

10. Before the development is commenced, details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long-term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

11. All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

12. Before the improved accesses are first used, visibility splays shall be provided as shown on Drawing Nos. B17SF\_VSPSA1 and B17SF\_VSPSA2 with an X dimension of 2.4m and a Y dimension of 160m and thereafter retained in the specified form, with the exception of the visibility splays for VSPSA1, that can be provided via temporary traffic signals, the details of which will have been previously approved in writing by the Planning Authority. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6

metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.'

#### **Noise Conditions**

13. Operational Noise: Prior to commencement of development, a noise assessment shall be submitted to the East Suffolk Council for approval in writing to include all proposed plant and machinery and in accordance with BS4142:2014+A1:2019. A noise rating level (LAr,T) from the scheme of at least 5dB below the typical background sound level (LA90,T) should be achieved at noise sensitive receptors. Where the noise rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise rating level should be identified and justified. This full assessment should inform any noise mitigation that may be needed.

#### The assessment shall include:

- a. Details of background sound level surveys at, or representative of noise sensitive receptors. This should include capturing the typical background sound levels at the end of the night-time between 05:00 and 07:00 hours. Ideally these surveys should take place on a number of days. The assessment report should include observations and descriptions of the sound climate during these surveys;
- b. Derivation of predicted noise rating levels at noise sensitive receptors to include for any acoustic character corrections such as tonality;
- c. Initial estimate of the noise impact by comparing the predicted noise rating level with typical background sound levels at noise sensitive receptors.

Reason: Once the proposed plant has been chosen, the submission of a Noise Impact Assessment that demonstrates that the operational rating noise levels (including character corrections as per BS4142 guidance) from the proposed solar farm plant installations would not exceed typical background sound levels for the relevant times of operation at nearby residential properties. This full assessment should be used to inform any noise mitigation that may be needed.

#### Surface Water Drainage Conditions

14. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained.

15. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and

maintenance of the disposal of surface water drainage.

16. Within 28 days of practical completion, a surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/

17. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction.

The approved CSWMP shall include Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- Temporary drainage systems;
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses;
- iii. Measures for managing any on or offsite flood risk associated with construction;

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater

https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/

INFORMATIVE: Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991. Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution.

#### **Ecological and Landscape Conditions**

18. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Preliminary Ecological Appraisal (PEA) (AECOM, February 2021); the Ornithological Survey Report (AECOM, August 2021); the Bat Survey Report (AECOM, August 2021) and the Ecology Surveys Technical Note (AECOM, August 2021) as submitted with the planning

application and agreed in principle with the local planning authority prior to determination. Further surveys for Otter and Water Vole as set out in the Further Ecology Surveys Technical Note (AECOM, Aug 2021) must be undertaken if 'HDD methods underneath the watercourse' are required for the cabling route between the development site and point of connection.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

19. No removal of hedgerows, trees or shrubs, or works to areas that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

20. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details for the control and management of noise and dust during the construction phase, and with respect to noise shall have due consideration of the guidance within BS 5228:2009+A1:2014. The CEMP will be adhered to by the contractor throughout the construction process, as outlined in the Environmental Statement Volume II (Technical Appendices) Appendix 3B: Draft Outline Construction Environmental Management Plan.

The CEMP shall include the following:

- a. Risk assessment of potentially damaging construction activities;
- b. Identification of "biodiversity protection zones";
- c. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- d. The location and timing of sensitive works to avoid harm to biodiversity features;
- e. The times during construction when specialist ecologists need to be present on site to oversee works;
- f. Responsible persons and lines of communication;
- g. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
- h. Use of protective fences, exclusion barriers and warning signs;
- i. Details for the control and management of noise and dust during the construction phase;
- j. Shall have due consideration of noise guidance contained within BS 5228:2009+A1:2014.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in

writing by the local planning authority.

Reason: To ensure that ecological receptors are adequately protected as part of the development. To also mitigate noise and dust impacts in particular to receptor locations during the construction phase.

- 21. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following:
- a. Description and evaluation of features to be managed;
- b. Ecological trends and constraints on site that might influence management;
- c. Aims and objectives of management;
- d. Appropriate management options for achieving aims and objectives;
- e. Prescriptions for management actions;
- f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g. Details of the body or organisation responsible for implementation of the plan;
- h. Ongoing monitoring and remedial measures;
- i. Details of seed mixtures to be sown in 'cover crop' areas;
- j. Details of appropriate management of cover crops to include;
- k. Details of stocking densities (if sheep are to be used to manage grassland areas);
- I. Details of maximised grassland margins to increase likelihood of providing nesting Skylark habitat;
- m. Details of proposed planting specifications;
- n. Details of landscaping and biodiversity net gain areas;
- o. Details of who will manage and maintain these areas once operational.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure that the long-term ecological value of the site is maintained and enhanced and to ensure that the proposed vegetation contributes to the agricultural character of the wider area and successfully screens solar farm infrastructure in views.

22. Prior to the any construction activity (including vegetation clearance or site preparation) within 50m of the River Ore, an Ecological Mitigation Method Statement will be submitted to and approved in writing by the Local Planning Authority. The Method Statement will be based upon suitably up to date ecological surveys undertaken by a suitably qualified ecologist. Mitigation measures described in the Statement will be implemented as approved unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that ecological receptors are adequately protected.

#### 6 Energy Projects Update

Councillor Rivett, the Deputy Leader and Cabinet Member with responsibility for Economic Development, gave a presentation to the Committee on Energy Projects within East Suffolk.

In summary, the presentation gave updates on the status of current and forthcoming projects and particularly highlighted Sizewell C DCO and next steps, EA1N and ES2 DCOs, Nautilus and Eurolink projects, and outlined other energy projects including Five Estuaries, North Falls and SCD1/South East Anglia Link which were all at the preapplication stage.

In addition, Councillor Rivett provided details of the Offshore Transmission Network Review (OTNR), Draft National Policy Statements (NPS), initial observations on the Revised NPS EN-1 and EN-2 to EN-5, and ongoing consultations. With regard to next steps, he confirmed that the Council would be responding to the consultation on the Nautilus MPI and review the draft NPSs before providing a response to the consultation. The Council would continue to engage with the OTNR and provide formal comments as required.

Councillor Rivett responded to Members' questions relating to sulphur hexafloride which was still used in the electricity industry to make switchgear safe and cool powerlines; obviously the powerlines from overhead pylons did not need cooling. It was understood that the Inspector's report on windfarms, due in the next few days would not be available; it was to be for the Secretary of State only.

It was proposed that, on behalf of the Committee, thanks be recorded to Councillor Rivett for a very informative update and also to the officers for their input and work behind the scenes.

Members noted that the presentation would be uploaded onto the website and be available to view with the Agenda papers.

#### 7 Draft Development Briefs for Housing and Commercial Site Allocations

The Planning Policy and Delivery Manager introduced Anthony Taylor, Senior Planner, from her Team who proceeded to give the Committee a presentation that had been requested by Members at their last meeting.

The Senior Planner gave a detailed presentation outlining the what and why of Development Briefs, the process used to prepare a Development Brief, work completed so far, an example of the Residential Development Brief for Land north of Union Lane, Oulton, and plans going forward.

The Chairman expressed thanks for a very clear and good presentation and invited questions.

Comment was made that it would have been beneficial to have been aware of the content of the presentation prior to the meeting and Members sought clarification on the selection of sites for preparing Development Briefs. The Senior Planner confirmed that the sites were selected from sites adopted in the East Suffolk Local Plans, focusing on those where a planning application had not yet been submitted. The purpose of preparing the briefs was to expand upon the Local Plan policies, providing further guidance and highlighting solutions for developing sites, not to use more land. Discussions were always undertaken with the Parish Council, County Council and landowner.

The Chairman expressed thanks for a such a clear explanation of Development Briefs. Members noted that the presentation would be uploaded onto the website and be available to view with the Agenda papers.

#### 8 Enforcement Performance Report - April to June 2021

The Committee received report ES/0906 which provided information on the performance of the Enforcement Section of the Development Management Team for the period April to June 2021.

The Cabinet Member with responsibility for Planning and Coastal Management advised Members that it had been a busy three months and the majority of closed cases were due to no breach, compliance or use ceased and planning permission granted. There being no specific questions, it was

#### **RESOLVED**

That the Enforcement Performance Report - April to June 2021 be noted.

#### 9 Planning Performance Report – April to June 2021

The Committee received report ES/0907 which provided an update on the planning performance of the Development Management Team in terms of timescales for determining planning applications during the period April to June 2021.

The Cabinet Member with responsibility for Planning and Coastal Management confirmed that decisions were made in a timely manner with both major and minor applications ahead of the national target but slightly below the stretched target. Other Developments came in at 76% just slightly below the national target. There had been a large number of applications during the period and the Council was still maintaining a high approval rate across all types of applications.

The Planning Development Manager confirmed that he had been in post since June and further opportunities were being taken up to expand the team including the recruitment of a third Principal Planner. A recent report from the Government on national statistics showed a 45% increase in the number of applications in 2021 while still working with the same resources. In addition, the Planning Development Manager displayed a slide showing the number of applications received, denied and granted

during the period 2005 to 2021 and the pre-pandemic comparison showed an 18.3% increase in applications received.

There being no questions or matters raised, it was

#### **RESOLVED**

That the Planning Performance Report - April to June 2021 be received and noted.

#### 10 Appeals Performance Report – 13 May to 21 September 2021

The Committee received report ES/0908 which provided 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 following refusal of planning permission by the Council.

The Cabinet Member with responsibility for Planning and Coastal Management advised that 17 planning appeal decisions and one enforcement appeal had been received during the period 13 May to 21 September 2021. He referred to the statistics in paragraph 2 of the report and drew particular attention to the circumstances in respect of 1 Hall Cottages, Reydon, where the Inspector had applied a Principal Residence Restriction by condition and Carlton Meres Country Park where the Inspector's view was that any harm to the environment was outweighed by the economics of the scheme.

The Planning Development Manager advised that the Council was one of the most successful authorities for defending appeals for 5+ homes, being supported by robust and up to date Local Plans and the required 5 year housing land supply.

Members expressed thanks to the officers for their work and there being no further discussion, it was

#### **RESOLVED**

That the content of the Appeals Performance Report -13 May to 21 September 2021 be noted.

#### 11 Planning Policy and Delivery Update

The Committee received report ES/0909 which provided an update on key elements of the current work programme, including preparing Supplementary Planning Documents (SPDs), strategies on specific topics such as cycling and walking, the delivery of infrastructure to support growth through Community Infrastructure Levy (CIL) collection and spend, Neighbourhood Plans and housing delivery.

Updates were provided with regard to Neighbourhood Plans and the plan for Southwold which was now with the Inspector; and Supplementary Planning Documents. Some 800 responses had been received on the initial consultation on the Cycling and Walking Strategy and work was continuing on the CIL Charging

Schedule. The Cabinet Member with responsibility for Planning and Coastal Management expressed thanks to Councillor Cooper for leading the CIL Working Group. There were good figures for housing delivery in the period April to June 2021 with 146 being completed which included 46 affordable homes. Whilst professional responses had been given to the Planning White Paper consultation, current indications were that there would likely be a delay on the publication of the expected Government response which had been due in the Autumn.

In response to Members' questions regarding the draft Cycling and Walking Strategy, draft Sustainable Construction Supplementary Planning Document and draft Affordable Housing Supplementary Planning Document, the Planning Policy and Delivery Manager advised that they were expecting consultation to start in early November. Consultation on the draft CIL Charging Schedule was also due to commence shortly.

In addition to those referred to in the report, the Team would also be preparing a further Supplementary Planning Document. The Planning Policy and Delivery Manager advised that it would be in relation to Local Plan policies SCDLP5.4 and WLP8.7 relating to housing in clusters in the countryside and small scale residential development in the countryside respectively. Whilst the policies were different, they did have the common intent of supporting rural sustainability. Clarification was required over the interpretation of the policies and the proposal was for a short and focussed document which would be consulted upon at the appropriate time.

As Chairman of the Scrutiny Committee, Councillor Bird made reference to Scrutiny's recent meeting during which they had looked at various aspects of housing. That Committee was making a recommendation to Cabinet to prepare a business case for Council houses to be increased from 50 to 100 per annum.

There being no further discussion, it was

#### **RESOLVED**

That the content of the Planning Policy and Delivery Update report be received and noted.

#### 12 Strategic Planning Committee's Forward Work Programme

The Head of Planning and Coastal Management advised that, at the present time, he was not expecting any additional items to come forward for the meeting in December. He did not anticipate there would be any planning applications.

The Chairman drew attention to the two items on the Work Programme that were unallocated and shown as reports to come before the Committee on a date to be confirmed: Annual Monitoring of the work of the Planning Committees and Review of Member Training in Planning Matters. The Head of Planning and Coastal Management advised that the appropriate time would be at the end of the municipal year and these items could, therefore, be added to the Work Programme for March 2022.

The meeting concluded at 12.22pm.
Chairmar



# STRATEGIC PLANNING COMMITTEE Monday, 13 December 2021

Subject	Authority Monitoring Report 2020/21
Report of	Councillor David Ritchie
	Cabinet Member with responsibility for Planning and Coastal Management
Supporting	Adam Nicholls
Officers	Principal Planner (Policy & Delivery)
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Is the report Open or Exempt?	OPEN
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Category of Exempt	Not applicable
Information and reason why it	
is <b>NOT</b> in the public interest to	
disclose the exempt	
information.	
Wards Affected:	All Wards

#### Purpose and high-level overview

#### **Purpose of Report:**

- 1. The Authority Monitoring Report (AMR) is produced annually to provide information on the progress of producing and implementing the Council's Local Plans.
- 2. The Council monitors planning applications throughout the year to provide a basis on which to judge the implementation and effectiveness of policies contained within Local Plans and Neighbourhood Plans. Monitoring data collected by the

Council is used alongside information collected from other sources such as Suffolk Observatory, Office of National Statistics and Natural England.

3. The 2020/21 AMR covers the monitoring period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021.

#### **Options:**

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

#### Recommendation/s:

- 1. That the Council publishes the East Suffolk Authority Monitoring Report covering the period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021.
- 2. That authority be delegated to the Head of Planning and Coastal Management Service, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, to make any necessary minor typographical or presentational changes to the document prior to formally publishing it.

#### **Corporate Impact Assessment**

#### Governance:

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

#### ESC policies and strategies that directly apply to the proposal:

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

#### **Environmental:**

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

#### **Equalities and Diversity:**

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

#### Financial:

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

#### **Human Resources:**

No impact.

#### ICT:

No impact.

#### Legal:

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

#### Risk:

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

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

Select the priorities of the <u>Strategic Plan</u> which are supported by this proposal: (Select only one primary and as many secondary as appropriate)			Secondary priorities	
T01	Growing our Economy			
P01	Build the right environment for East Suffolk	$\boxtimes$		
P02	Attract and stimulate inward investment			
P03	Maximise and grow the unique selling points of East Suffolk		$\boxtimes$	
P04	Business partnerships			
P05	Support and deliver infrastructure			
T02	Enabling our Communities			
P06	Community Partnerships			
P07	Taking positive action on what matters most			
P08	Maximising health, well-being and safety in our District			
P09	Community Pride		×	
T03	Maintaining Financial Sustainability			
P10	Organisational design and streamlining services			
P11	Making best use of and investing in our assets			
P12	Being commercially astute			
P13	Optimising our financial investments and grant opportunities		×	
P14	Review service delivery with partners			
T04	<b>Delivering Digital Transformation</b>			
P15	Digital by default			
P16	Lean and efficient streamlined services			
P17	Effective use of data		×	
P18	Skills and training			
P19	District-wide digital infrastructure			
T05	Caring for our Environment			
P20	Lead by example		⊠	
P21	Minimise waste, reuse materials, increase recycling			
P22	Renewable energy		⊠	
P23	Protection, education and influence			
XXX	Governance			
XXX	How ESC governs itself as an authority			
How	How does this proposal support the priorities selected?			

The Authority Monitoring Report collates and analyses a wide range of environmental, social and economic data and information of relevance to East Suffolk, especially in relation to the implementation of the policies of the two Local Plans.

### **Background and Justification for Recommendation**

1	Background facts
1.1	The Council produces the Authority Monitoring Report (AMR) each year to show progress on producing and implementing the Local Plans. This report covers East Suffolk as a whole and provides specific information relating to the Suffolk Coastal Local Plan, Waveney Local Plan and Neighbourhood Plans.
1.2	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires key pieces of information to be covered by an Authority Monitoring Report, such as:
	<ul> <li>Progress on the Local Plan against the timetable in the Local Development Scheme;</li> </ul>
	<ul> <li>Details of any Neighbourhood Plans or Neighbourhood Development Orders that have been 'made' (adopted);</li> </ul>
	<ul> <li>Any action taken under the Duty to Co-operate;</li> </ul>
	<ul> <li>Details of any policies not being implemented;</li> </ul>
	<ul> <li>Net amount of additional affordable housing; and</li> </ul>
	<ul> <li>Total housing (and affordable housing) completed against annual requirements.</li> </ul>
1.3	This AMR covers the monitoring period 1 <sup>st</sup> April 2020 to 31 <sup>st</sup> March 2021 and provides monitoring information against indicators in the Local Plans, such as housing completions, town centre uses, tourism applications, environmental designations and the planning applications that the Council received.
1.4	The Local Plan covering the former Suffolk Coastal area was, for the first half of 2020/21 year, made up of various documents (Core Strategy and Development Management Policies, Site Allocations and Area Specific Policies, Felixstowe Peninsula Area Action Plan). These were all superseded upon adoption of the Suffolk Coastal Local Plan on 23 <sup>rd</sup> September 2020. The bulk of the monitoring has been undertaken on the current Local Plan, albeit as there are only about six months' results, relatively little on the implementation of the Plan can be gleaned from analysing the data.
1.5	The Local Plan covering the former Waveney area was adopted in March 2019.  This is therefore the second monitoring report covering the adopted Waveney Local Plan.
1.6	The previous individual local authorities have a long and established history of producing the AMR. Suffolk Coastal District Council and Waveney District Council both first published an AMR in December 2005 to cover the monitoring period 2004/05.

2	Current position
2.1	In accordance with the regulations and examples of best practice, the Authority Monitoring Report for East Suffolk (see Appendix A) includes sections which focus on specific aspects of the Local Plan process.
2.2	Chapter 1 introduces the document, with Chapter 2 outlining the content and structure of the report.
2.3	Chapter 3 provides information in relation to the progress of the Local Plan documents against the milestones outlined in the Local Development Schemes which guide the production of the Local Plan.
	<ul> <li>Suffolk Coastal Local Plan – Local Development Scheme adopted in October 2015 (and amended in June 2020) and milestones for the examination of the Local Plan by the Planning Inspectorate, and it's subsequent adoption by the Council, were met within the monitoring period.</li> </ul>
	Waveney Local Plan – As the Local Plan was adopted in March 2019, there were no milestones for this monitoring period.
2.4	Many other Neighbourhood Plans progressed their production during 2020/21.
2.5	Chapter 5 relates to the Community Infrastructure Levy. The Council is required to produce an annual Infrastructure Funding Statement (IFS), which details developer contribution income, allocations and spending as well as the Infrastructure List; the list or projects that developer contributions may fund to support the local plan growth. The <a href="https://doi.org/10.200/21 IFS">2020/21 IFS</a> was approved in principle by Cabinet in September 2021 and contains financial reports relating to CIL and Section 106 contributions, which no longer need to be reported in the AMR. However, the headline figures (which are included in the AMR) for 2020/21 show significant increases on the figures for the previous year (2019/20):  CIL received in the monitoring period was £6.6m  CIL Demand Notices (for development commenced in the period) totalling
	• CIL Demand Notices (for development commenced in the period) totalling £9.2m  • CIL Liability Notices (issued on the grant of CIL chargeable development) totalling £15.6m
	<ul> <li>Total s106 contributions received by East Suffolk Council was £5.4m (other contributions, for highways works or Education (for example) were made to direct to Suffolk County Council). Any contributions directly received by other bodies will be reported in their Infrastructure Funding Statement in line with the CIL Regulations.</li> </ul>
	<ul> <li>The Council is also preparing a single CIL Charging Schedule for the whole of East Suffolk (to replace the current Suffolk Coastal and Waveney Charging Schedules), with the formal consultation ending on 23<sup>rd</sup> December 2021.</li> </ul>
2.6	Under the Localism Act 2011, local planning authorities are required to engage constructively, actively and on an on-going basis in relation to strategic cross-boundary planning matters and East Suffolk Council regularly engages with neighbouring authorities and other prescribed bodies to ensure co-operation on various matters throughout the production and implementation of Local Plan documents.

- 2.7 Chapter 7 details how the Suffolk Coastal and Waveney Local Plans have been implemented, performed and delivered over the monitoring period. The chapter is split into sub sections that are outlined below:
  - Planning appeals a slight decline in appeals (total 99 compared to 119 in 2019/20) but the dismissal rate remains high (about 70%), which shows that the Council is generally making correct decisions. Very few "costs awards" were made by inspectors because of "unreasonable" behaviour by the Council in defending appeals.
  - Employment overall there has been a relatively small decline in employment floorspace across East Suffolk, in both Suffolk Coastal and Waveney. Of particular note is an increase of 7,500m² in rural areas of Suffolk Coastal and the demolition of the six-storey former BT office (20,000m²) in Felixstowe (although this site will be re-developed for other employment use).
  - <u>Retail</u> the number of vacant units in the town centres changed relatively little overall. The inability of landlords to evict tenants during Covid (due to the national ban) is likely to have played a significant role in this. However, Bungay saw an increase of four units and has, along with Lowestoft, the highest proportion of vacancies, with both at about 21%.
  - Housing 712 new homes completed during the monitoring period (511 in Suffolk Coastal and 201 in Waveney); in terms of affordable homes, a total of 132 were completed (90 in Suffolk Coastal and 42 in Waveney). The Council has a housing land supply of 6.52 years in Suffolk Coastal and 5.74 years in Waveney. The Housing Delivery Test for the period 2017/18-2019/20, published in January 2021, showed 109% delivery in East Suffolk as a whole. An update to the Housing Action Plan was published in August 2020, and again in August 2021.
  - <u>Transport</u> applications received generally in conformity with the Suffolk County Council guidance on parking standards. Local Plan policies seek to further increase use of sustainable modes of transport.
    - Community Facilities and Assets Eight new Assets of Community
       Value have been successfully listed this year. A number of gains and
       losses proposed by planning consents for community facilities are
       noted in the AMR, with some of the gains (such as a new childcare
       nursery in Carlton Colville and the refusal of permission to re develop Southwold Police Station for housing) being particularly
       noteworthy. In addition, eight applications permitted either new, or
       enhancements to existing, open spaces.
  - <u>Climate Change</u> No planning applications have been approved in the monitoring period against Environment Agency advice on flood risk. In addition, the Council:
    - published its <u>Environment Guidance Note</u> in November 2020, which contains much information and good practice on measures to help drive up the environmental performance of buildings
    - had the initial consultation on the <u>Sustainable Construction</u>
       <u>Supplementary Planning Document</u> (SPD) (and <u>the draft SPD</u> is out for consultation until 13<sup>th</sup> December 2021) which will provide clear guidance for how developers can comply with the two Local Plan policies on methods of sustainable construction
    - undertook the <u>initial consultation on the East Suffolk Cycling & Walking Strategy</u>, which attracted over 800 representations (<u>a</u>

	further consultation on this document is running until 10 <sup>th</sup> January 2022)
	<ul> <li>has continued work (with Great Yarmouth Borough Council, North Norfolk District Council and the Broads Authority) on the preparation of a single Coastal Adaptation SPD, with the <u>initial</u> <u>consultation running in September and October 2020</u></li> </ul>
	<ul> <li>Natural Environment – no instances of nitrogen dioxide above the national objective level of 40μg/m³ and air quality actually improved slightly (due to much lower traffic as a result of Covid). One of the two Air Quality Management Areas remain (at Woodbridge) has been under the limit for some years and the process of de-designating it has begun. The other AQMA, at Stratford St Andrew, has seen improvements too and it is hoped that it will continue to stay below the 40μg/m³ limit, which could lead to the de-designation process eventually too.</li> </ul>
	<ul> <li>Historic Environment – key points are:</li> </ul>
	<ul> <li>Work on the <u>Historic Environment SPD</u> reached a conclusion (it was formally adopted in May 2021, just outside the monitoring period)</li> <li>South Lowestoft Heritage Action Zone (HAZ) and North Lowestoft HAZ work continued and the <u>North Lowestoft HAZ Design Guide</u> was adopted in July 2020</li> </ul>
	<ul> <li>North Lowestoft Conservation Area continues to be considered "at risk" by Historic England, due to some unsympathetic works to various buildings</li> </ul>
	<ul> <li>Changes to the Woodbridge and Yoxford Conservation Areas and four replacement Conservation Area appraisals were approved</li> </ul>
	<ul> <li>Health – communities in the former Suffolk Coastal area generally have better health and life expectancy than communities in the former Waveney area. Rates of physical activity are below the national average and obesity rates for both adults and children (Yr 6, age 10/11) remain worryingly high. Anxiety levels have increased; they are now above the national average in the former Waveney area.</li> </ul>
	<ul> <li>Site Allocations – this section provides a summary of site allocations with planning permission as at 31<sup>st</sup> March 2021. It also includes the site allocations identified in the various 'made' Neighbourhood Plans.</li> </ul>
2.8	Chapter 8 relates to the Sustainability Appraisals that support the Local Plan documents. Tables provide a summary of potential significant effects (positive and negative) identified in the Council's Sustainability Appraisals. Monitoring of these enables the potential significant effects to be assessed and any remedial action to be taken if required.
2.9	The document also includes four appendices to provide further detail, justification and information in respect of the details included in the AMR.
2.10	The AMR for the monitoring period 2020/21 shows that the policies in the Local Plans and Neighbourhood Plans across the district are generally performing as expected. The policies are all evidence based and examples of best practice. They provide consistency of decision making for those wishing to bring forward applications and certainty for the local communities in respect of the future development and infrastructure requirements across the District.
•	·

3	Relationship To Housing Land Supply
3.1	The Authority Monitoring Report largely reports on progress on the implementation of the Local Plans over the past monitoring year (in this case 2020/21). The Council also has a duty to annually update its housing land supply position, to set out its supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement.
3.2	The housing land supply position as at 31 <sup>st</sup> March 2021 was published in October 2021, and is:  Suffolk Coastal Local Plan area: 6.52 years
	Waveney Local Plan area: 5.74 years
3.3	As both of the Council's Local Plans are less than five years old, the supply is measured against the housing requirements in the Local Plans (where plans are over five years old the assessment is made against housing need calculated using the Government's standard methodology). Account is also taken of any shortfall in delivery over the plan period and an appropriate buffer is then added on top as required by the National Planning Policy Framework (for East Suffolk this is 5% this year).
3.4	The five-year supply is made up of many sites of a range of sizes, including most sites with full planning permission, some sites with outline permission and some allocations in Local Plans and Neighbourhood Plans. To be included, sites must meet the definition of 'deliverable' as set out in the National Planning Policy Framework. For some categories of site, including allocations without permission and larger sites with outline permission, to be included clear evidence must be provided to demonstrate that housing completions will begin on site within five years. An allowance is also made for windfall development – these are developments that are not yet known however reflects that the Local Plans contain policies to support appropriate development coming forward that isn't allocated (for example development within Settlement Boundaries and affordable housing on exception sites).
3.5	A large number of dwellings also sit outside the five-year supply period, where there is insufficient evidence that completions will take place during the next five years. This includes many dwellings on allocated sites as well as dwellings with outline consent (especially the largest sites, which can have long lead-in times). However, it is anticipated that as time goes on progress will be made and these sites would feature in the five-year supply, just as sites currently being developed will eventually drop out of the supply and be recorded as completions in future AMRs.
3.6	The Council also has a Housing Action Plan which it updates each year and which contains actions to support the delivery of housing. These actions will, by supporting appropriate housing development coming forward, contribute towards the maintenance of a five-year supply.

# 4.1 In order to publish the AMR for the monitoring period 2020/21, the Council's Constitution outlines that Strategic Planning Committee is required to review and monitor the operational impact of the Council's planning policies and development management activities.

### **Appendices**

Appendices:
Appendix A E East Suffolk Authority Monitoring Report 2020/21

Background reference papers:			
Date	Type	Available From	
October 2021	Statement of Housing Land supply as at 31 <sup>st</sup> March 2021, and Appendices	www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/	
August 2021	Housing Action Plan	www.eastsuffolk.gov.uk/planning/housing- action-plan/	

# DRAFT East Suffolk Author Draft Suffolk Author Draf

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

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

Published December 2021



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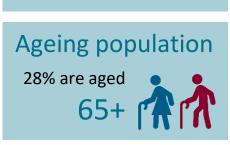
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Whilst every effort is made to ensure the accuracy of data in this report, it cannot be guaranteed free of errors.

## About East Suffolk



**56%** of people are aged 16-64











# Key statistics 2020/21





81% market homes 19% affordable homes

#### **Neighbourhood Plans**

O Plans 'made'



O Areas designated (affected by Covid)



**Housing Land** Supply

**6.52** years former Suffolk Coastal area

**5.74** years former Waveney area

### Community Infrastructure Levy



£6.5.m collected

£15.6m total 'billed'

£5.4m non-CIL developer contributions received

#### 0.39 hectares



**Employment** land delivered (net)

Source: About East Suffolk - Office for National Statistics population estimates 2020; Valuation Office Agency Council Tax Stock of Properties 2021; Business Register and Employment Survey 2019. Key statistics 2020/21 - see Appendix 1 Indicators and sources

## 1 Introduction

- 1.1 Authority Monitoring Reports (AMRs) provide an assessment on the progress of the preparation of Local Plans and monitor the effectiveness of polices and the delivery of allocations in the Local Plans.
- 1.2 This Authority Monitoring Report covers the monitoring period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021 and includes any significant progress that has been made or milestones achieved in this monitoring period.
- 1.3 Monitoring plays an important role in the successful delivery of Local Plans. The AMR is the main mechanism for assessing the effects of the Local Plan and the performance of its policies. The results of monitoring will feed into any future review or revision of policies that may be required. The AMR therefore performs an important role by assessing performance and informing the review of outdated or redundant planning policies.
- 1.4 East Suffolk Council was created on 1<sup>st</sup> April 2019, covering the former districts of Suffolk Coastal and Waveney. East Suffolk Council is the Local Planning Authority for the District (other than the part that lies within the Broads Authority area).
- 1.5 Both former Councils have produced an AMR each year since 2004/05. This is the third AMR for East Suffolk. The Broads Authority produces its own monitoring report to cover that part of East Suffolk that lies within the Broads Authority area.
- 1.6 The East Suffolk Waveney Local Plan was adopted on 20<sup>th</sup> March 2019, and the East Suffolk, Suffolk Coastal Local Plan was adopted on 23<sup>rd</sup> September 2020, superseding the respective adopted planning policies and site allocations for the two formerly separate councils. It is therefore the effectiveness of these adopted Local Plan policies covering the two former districts that will be reflected in this Authority Monitoring Report.

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

# 2 Content and structure of the report

- 2.1 There are key pieces of information that must be covered by an Authority Monitoring Report:
  - progress on the Local Plan against the timetable in the Local Development Scheme;
  - details of any neighbourhood plans or neighbourhood development orders that have been adopted;
  - any Community Infrastructure Levy receipts;
  - any action taken under the duty to cooperate;
  - details of any policies not being implemented;
  - · net amount of additional affordable housing; and
  - total housing (and affordable housing) completed against annual requirements.
- 2.2 This report covers the monitoring period 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021, and is structured as follows:
  - Section 3 reports on the progress of the Suffolk Coastal and Waveney Local Plans against their respective Local Development Scheme key milestones
  - Section 4 reports on Neighbourhood Plans / Neighbourhood Development Orders across East Suffolk
  - Section 5 reports on Community Infrastructure Levy receipts and payments for the former Suffolk Coastal and Waveney areas
  - Section 6 reports on the way in which the authority has continued to fulfil the requirements under the Duty to Cooperate associated with Local Plans covering the former Suffolk Coastal and Waveney areas
  - Section 7 reports on the implementation, performance and delivery of the Local Plans in East Suffolk
  - Section 8 monitors the predicted Sustainability Appraisal significant effects of the Local Plans in East Suffolk
- 2.3 Section 7 is broadly arranged to reflect the Local Plan chapters in the Suffolk Coastal and Waveney Local Plans. In addition, a section on Health is included to reflect the theme of enabling communities which is central to the East Suffolk Business Plan and a cross cutting theme in the Local Plans. The Council seeks to support healthy communities and promote healthy lifestyles through Local Plan

- policies that respect the varied demographics across the District, including policies for new or improved sporting facilities, and extra care / care homes to support the ageing population.
- 2.4 Each Local Plan has a Monitoring Framework setting out how the performance of the policies they contain will be monitored. Many of these indicators are similar for both areas. A Sustainability Appraisal was carried out for each Local Plan which identified additional indicators to monitor any potential significant positive or negative effects of the Plans.
- 2.5 Whilst some indicators are monitored annually by the Council or external bodies, others are monitored less frequently (for example through the national Census or specially commissioned studies). Results for some indicators change near-constantly or regularly such as housing completions, employment figures or the number of vacant shops in town centres; such indicators can have information on timescales ranging from monthly to quarterly. Others, such as health, education and many environmental indicators, will show changes and trends over a longer timescale. This means it is not always possible, practical or useful to report on every indicator every year. Also, for the 2021/21 monitoring period some data for a number of indicators is not available due to the Covid-19 pandemic such as school closures impacting on the data gathering for the National Child Measurement Programme and bathing water sample gathering.
- 2.6 A list of indicators common to both the Waveney Local Plan 2019 and the Suffolk Coastal Local Plan 2020 have been used to provide the basis for monitoring and reporting in this AMR. The analysis and commentary provided for the data presented has focused on the main findings and will assist in providing a baseline for future monitoring of the new Local Plans. See Appendix 1 for full list of indicators and data sources.
- 2.7 Where appropriate or available, data for East Suffolk is presented. Unless stated, data is for the 2020/21 monitoring period.
- 2.8 Where relevant, an assessment of the performance of policies and objectives against the indicators is given for each adopted Local Plan.
- 2.9 More detailed information for a number of indicators such as housing completions, retail and employment land surveys are available to view and download in the form of spreadsheets or shapefiles from the Council's open data portal at <a href="http://data-eastsuffolk.opendata.arcgis.com">http://data-eastsuffolk.opendata.arcgis.com</a>.
- 2.10 Section 8 reports on the Sustainability Appraisal indicators to monitor potential significant effects of the Local Plans.

2.11 Further planning information can be found on East Suffolk Council's webpages:

Planning Policy and Local Plans <a href="https://www.eastsuffolk.gov.uk/localplan">www.eastsuffolk.gov.uk/localplan</a>

Open Data Portal <a href="http://data-eastsuffolk.opendata.arcgis.com">http://data-eastsuffolk.opendata.arcgis.com</a>

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

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

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

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

Planning Applications <a href="https://www.eastsuffolk.gov.uk/planning-applications">www.eastsuffolk.gov.uk/planning-applications</a>



# 3 Progress of Local Plan against Local Development Scheme milestones

#### Suffolk Coastal Local Plan

3.1 The Suffolk Coastal <u>Local Development Scheme</u> was adopted on 16<sup>th</sup> October 2015 and amended in June 2020 to take account of the latest Local Plan examination timescale. Whilst the examination of the Local Plan ended up taking longer than originally expected (due to a variety of reasons), the key milestones (taking matters up-to-date to the adoption of the Local Plan) were:

August/September 2019 Examination Hearing

Late summer-early autumn 2020 Receipt of Inspector's report

Adoption of Local Plan By December 2020

3.2 These milestones were met, with the Local Plan adopted on 23<sup>rd</sup> September 2020.

#### Waveney Local Plan

3.3 The Waveney <u>Local Development Scheme</u> was adopted and came into effect on 28<sup>th</sup> September 2018. There are no milestones for this monitoring period as the Local Plan was adopted by (the nowformer) Waveney District Council on 20<sup>th</sup> March 2019.

# 4 Neighbourhood Plans / Neighbourhood Development Orders

- 4.1 Neighbourhood Plans are optional plans prepared by the local community which set out detailed planning policies and proposals for their specific area e.g. a parish. Once 'made,' they form part of the Development Plan against which planning applications must be determined.
- 4.2 A Neighbourhood Plan allows communities to create a vision and planning policies for the use and development of land for their area, for example, where new homes should be built and what they should look like.
- 4.3 Neighbourhood Development Plans must be in general conformity with the strategic policies in the Council's adopted Local Plans.
- 4.4 With a Neighbourhood Development Order, communities can grant planning permission for development they want to see go ahead in a neighbourhood, for example allowing home extensions to be built without the need to apply for planning permission.

Neighbourhood Planning 2020/21	Neighbourhood Plan	Date
Neighbourhood areas designated	-	-
Neighbourhood Plan	Bredfield	September 2019 – July 2020
Examinations	Kesgrave	March – June 2020
	Reydon	April – July 2020
Neighbourhood Plans 'made'	-	-
Housing allocations in made	-	-
Neighbourhood Plans to meet		
minimum indicative		
requirements		
Neighbourhood Development	-	-
Orders		

4.5 Covid restrictions have impacted on the preparation of neighbourhood plans. However, examinations for Bredfield, Kesgrave and Reydon neighbourhood plans were completed and the plans underwent referendum on 6 May 2021. Following successful referendums, all three

- neighbourhood plans were 'made' by Council on 26 May 2021 and form part of the development plan for the District and carry statutory weight in making planning decisions.
- 4.6 Beccles Town Council submitted their neighbourhood plan to East Suffolk Council and the Broads Authority ahead of it being submitted for independent examination. East Suffolk Council publicised the plan and invited representations between 14 December 2020 and 8 February 2021. Although outside of the monitoring period, the Examiner's report was published in May 2021 and subject to modifications able to proceed to Referendum on 16 September 2021.
- 4.7 A number of 'made' neighbourhood plans allocate sites for specific purposes such as housing, employment or mixed use. Section 7 reports on the progress and delivery of these sites along with those allocated in the Local Plans.
- 4.8 Further information on Neighbourhood Planning including information on all designated neighbourhood areas, 'made' Neighbourhood Plans and guidance notes can be found at <a href="https://www.eastsuffolk.gov.uk/neighbourhoodplanning.">www.eastsuffolk.gov.uk/neighbourhoodplanning.</a>

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

- Information on the amount of money raised and (as appropriate) distributed through Community Infrastructure Levy (CIL) and Planning Obligations (S106 legal agreements) must be published in the Infrastructure Funding Statement (IFS). The 2020/21 IFS which includes the CIL Report, the S106 Report and the Infrastructure List has been published.
- 5.2 Community Infrastructure Levy receipts are distributed as follows:
  - 15%<sup>1</sup> is passed to the relevant Town/Parish Council. For areas covered by a 'made' Neighbourhood Plan or Neighbourhood Development Order, 25% is passed to the Town/Parish Council
  - 5% is retained by the Council to cover administration expenses associated with setting, collecting, monitoring and spending CIL
- 5.3 The remaining Levy amount, known as District CIL, is retained by the Council to be spent on infrastructure to support development in the Local Plan and in Neighbourhood Plans. The allocation of District CIL to different required infrastructure projects is made through an annual process, in consultation with infrastructure service providers, and is agreed by the Council's CIL Spending Working Group, in line with the principles set out in the Council's CIL Spending Strategy.
- 5.4 Changes to the CIL legislation in 2019 now require the production of annual Infrastructure Funding Statements (IFS). The annual IFS must set out which projects are to be funded by CIL in the future, as well as how much CIL has been collected, what it has been spent on and how much has been passed to parish councils. Similar information is also required to be published in relation to Section 106 legal agreements (planning obligations).
- 5.5 The Council has published its second (2020-21) Infrastructure Funding Statement, which can be found at <a href="https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/">https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/</a>. As a result, the contents are not duplicated in this AMR, other than the summary figures

<sup>&</sup>lt;sup>1</sup> Subject to a cap of £100 (indexed) per council tax dwelling

below for 2020/21 (and see also the Council's CIL Reporting webpage for more details: <a href="https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-reporting/">https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-reporting/</a>):

CIL received	£6,554,000
CIL Demand Notices issued	£9,200,000
CIL Liability Notices issued	£15,624,000
Total developer contributions (S106 legal agreements & RAMS habitat mitigation)	£5,382,000
received (inc affordable housing contributions)	

5.6 The Council is preparing a single CIL Charging Schedule for East Suffolk, which on adoption (currently scheduled for summer 2022) will replace the existing two CIL Charging Schedules. Further information on Community Infrastructure Levy in East Suffolk can be found at <a href="https://www.eastsuffolk.gov.uk/CIL">www.eastsuffolk.gov.uk/CIL</a>.

### 6 Duty to Cooperate

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

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

#### Suffolk Growth Partnership

- 6.2 Suffolk Growth is funded by Suffolk Public Sector Leaders (SPSL). Suffolk Growth is a partnership organisation that brings together local authority teams to develop and deliver our shared inclusive growth agenda. The partnership works closely with New Anglia Local Enterprise Partnership (NALEP), Suffolk Chamber of Commerce, the University of Suffolk, Suffolk Constabulary, and wider public sector teams, including communities and health.
- 6.3 Suffolk Growth is leading in the delivery of a number of projects related to enabling growth, including the Suffolk Design project and associated guidance. Covid-19 has impacted the progress of Suffolk Design however work on Suffolk Design for Streets is continuing and will be finalised and published in early 2022. The Suffolk Design Management Process is reaching its final stages of production and is currently going through a process of engagement with housebuilders, led by the Suffolk Design officer group. Further information can be found at <a href="https://www.suffolkdesign.uk">https://www.suffolkdesign.uk</a>
- 6.4 Suffolk Growth leads the economy and business response and recovery to Covid-19 in Suffolk. This includes details of the local and national funding support available to all businesses which is regularly updated, including the Suffolk Inclusive Growth Investment Fund. Local surveys have been carried out to assess the impact of Covid-19 on the economy and businesses and links provided to the Government's latest guidance and legislation to support businesses operating safely. Suffolk Local Authorities distributed over £326m in grants to 67,164 local business between March 2020 and September 2021.
- 6.5 Further details on the work of the Suffolk Growth Partnership including Suffolk's Framework for Growth can be found at <a href="https://www.suffolkgrowth.co.uk/suffolks-growth-framework">https://www.suffolkgrowth.co.uk/suffolks-growth-framework</a>

#### **Coastal Zone Management**

6.6 East Suffolk Council, along with other coastal authorities, co-operate in relation to strategic cross-boundary matters relevant to the management of the coast. East Suffolk Council, along with the Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority signed a Statement of Common Ground in relation to

Coastal Zone Planning in September 2018. This sets out a series of shared aims and an agreed approach in relation to working together on coastal planning issues. The Statement of Common Ground can be viewed at <a href="https://www.coasteast.org.uk/plans-and-policies/local-plans/">https://www.coasteast.org.uk/plans-and-policies/local-plans/</a>

6.7 The day to day management of the coast in the district is covered by Coastal Partnership East, a partnership which brings together the coastal management resources and expertise from Great Yarmouth Borough Council, North Norfolk District Council and East Suffolk Council.

#### <u>Ipswich Strategic Planning Area</u>

- 6.8 The Ipswich Strategic Planning Area (ISPA) comprises the geographic area of the former Suffolk Coastal District, along with Ipswich Borough and Babergh and Mid Suffolk Districts. The authorities within this area have a long-established history of working together on cross-boundary planning matters, including through the former Ipswich Policy Area Board.
- 6.9 The ISPA Board, which evolved from the Ipswich Policy Area Board, comprises a councillor representative from each of these authorities and also from Suffolk County Council. The Terms of Reference for the Board were produced in March 2018 and updated in July 2019, and identify the function of the Board as being to provide a forum in which the five local authorities can work together to develop, promote and deliver their vision for the Ipswich Strategic Planning Area; to cooperate on the preparation and monitoring of local plans; and to provide a mechanism to ensure that all partners and stakeholders work together to deliver the housing and employment growth requirements for the area and coordinate the delivery of the necessary infrastructure.
- 6.10 The local planning authorities within the ISPA are committed to the production of joint or aligned Local Plans through their Local Development Schemes and have subsequently worked together on the production of evidence and the identification of appropriate outcomes to address cross-boundary planning matters.
- 6.11 As advocated by the National Planning Policy Framework (paragraph 27), this work has been documented through the production of a Statement of Common Ground. The Statement of Common Ground covers the following cross-boundary matters:
  - Alignment of timetables;
  - Strategic Policies and Vision for the Ipswich Strategic Planning Area;
  - Agreeing the approach to the delivery of the housing requirement;
  - Impact of bordering strategic housing developments;
  - Defining the functional economic market area and objectively assessed need;
  - Impact of bordering strategic employment land developments;
  - Enhancement and regeneration of retail centres;
  - Strategic Infrastructure Priorities;

- Identification of cumulative / cross border infrastructure requirements resulting from planned growth, and mitigation measures;
- Mitigation of potential impacts upon internationally protected sites.
- 6.12 The Statement of Common Ground has been updated and evolved to respond to the progression of the production of Local Plans, the production and updating of evidence and changes in national policy and guidance. The Statement of Common Ground was updated twice during the 2020/21 monitoring period. Version 6 was signed and published alongside the Submission of the Ipswich Local Plan in June 2020. Version 7 was signed and published to accompany the submission of the Babergh and Mid Suffolk Joint Local Plan in March 2021.
- 6.13 Much of the work on joint evidence to inform the local plans in the Ipswich Strategic Planning Area was undertaken prior to the 2020/21 monitoring period and is documented in the Statement of Common Ground. During the monitoring period, in progressing Local Plans the Councils co-operated further on the production of the following evidence:
  - Transport modelling a number of iterations of transport modelling work have been undertaken to model the cumulative impacts of growth identified through local plans in the ISPA on the highways network. In the 2020/21 monitoring period, further modelling was undertaken as part of the preparation of adjoining authorities' Local Plans.
- 6.14 The Statement of Common Ground documents outcomes in relation to agreements on strategic cross-boundary planning matters. These are set out in the Statement of Common Ground and include:
  - That the standard method will form the starting point for calculating housing need and that each local planning authority will plan to meet its own housing need;
  - The identification of baseline jobs growth and land requirements, and the roles of strategic scale employment sites within the respective authorities of the ISPA;
  - That Local Plans will recognise the regional role of Ipswich town centre;
  - The strategic infrastructure projects that are identified as being priorities;
  - Cross-boundary infrastructure requirements related to growth being planned for in Local Plans, including the production of a transport mitigation and funding strategy, to identify funding and delivery mechanisms related to modal shift;
  - The role of the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) in mitigating the cumulative impacts of recreational disturbance on protected European sites from growth in the ISPA;
  - The Statement of Common Ground further identifies land at Humber Doucy Lane as a crossborder housing allocation involving land within Ipswich Borough and the former Suffolk Coastal area which has been progressed through the production of Local Plans for the two areas.

6.15 Action Notes from Ipswich Strategic Planning Area Board meetings, the Terms of Reference and the signed Statement of Common Ground (March 2021) can all be viewed on the ISPA website at <a href="https://www.ipswich.gov.uk/content/ipswich-strategic-planning-area">www.ipswich.gov.uk/content/ipswich-strategic-planning-area</a>.

#### The Norfolk and Suffolk Broads

- 6.16 The Norfolk and Suffolk Broads is a National Park that include Britain's largest protected wetlands and third largest inland waterway. The National Park covers parts of East Suffolk, South Norfolk, Great Yarmouth, Broadland, Norwich and North Norfolk and is managed by the Broads Authority<sup>2</sup> (which was set up 1989). The Broads overlaps the northernmost part of East Suffolk along the River Waveney and Oulton Broad and takes in parts of Bungay and Beccles. Under the Duty to Cooperate a 'Memorandum of Understanding' with the Broads Authority was signed by all the Authorities that border the Broads Authority area.
- 6.17 The 'Memorandum of Understanding' notes the statutory purposes imposed by the Norfolk and Suffolk Broads Act 1989 (as amended) including:
  - Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
  - Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
  - Protecting the interests of navigation.
- 6.18 The 'Memorandum of Understanding' states the Broads Authority will not have a strategic housing target or the need to deliver a particular quantum of housing or employment development. The Districts will assess, for planning purposes the housing and employment needs for their administrative areas and deliver wholly outside of the Broads area. The 'Memorandum of Understanding' was last updated in 2012 as part of a Statement of Common Ground to support the examination of the Broads Local Plan.
- 6.19 A Statement of Common Ground was signed in 2018 and confirmed the housing agreement between the Broads Authority and former Waveney District Council. The Broads' Objectively Assessed Need forms part of the Waveney Housing Market Area. The Broads Authority agreed to report any housing completions in their area to the former Waveney District Council to be counted towards housing delivery targets. The Broads Local Plan was adopted in May 2019 and the housing completions are now reported to East Suffolk Council.
- 6.20 The 'Memorandum of Understanding' and 'Statement of Common Ground' with the Broads
  Authority are reproduced in the Appendices of the 'Duty to Cooperate Statement for the Waveney
  Local Plan' which can be viewed at <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Final-Draft-Local-Plan/Duty-to-Cooperate-Statement.pdf">www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Duty-to-Cooperate-Statement.pdf</a>. A review of the Broads Local Plan

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<sup>&</sup>lt;sup>2</sup> www.broads-authority.gov.uk

commenced in early 2021 and will require a review of both the 'Memorandum of Understanding' and 'Statement of Common Ground'.

#### **Great Yarmouth Borough Council**

- 6.21 The former Waveney area and Great Yarmouth Borough Council area share similar characteristics, economies, regeneration plans, and aims to attract offshore energy investment. Despite their similarities the two areas have their own separate Housing Market Areas and Functional Economic Areas. Great Yarmouth Borough Council and the former Waveney District Council signed a 'Memorandum of Understanding' in 2014 agreeing to work on strategic planning matters. These priorities include:
  - The homes and jobs needed in the Housing Market Areas;
  - Retail, leisure and other commercial development;
  - Infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy;
  - Health, security, educational, community, cultural and green infrastructure and other local facilities; and
  - Climate change mitigation and adaptation, habitat impact mitigation, conservation and enhancement of the natural and historic environment including landscape.
- 6.22 The two areas have an extensive history of working together on a range of strategic planning and cross boundary issues including the production of evidence base studies to support the development of Local Plans, Area Action Plans and Supplementary Planning Documents. The 'Memorandum of Understanding' is kept under review and regular meetings continue to be held between Great Yarmouth and East Suffolk Councils.
- 6.23 The 'Memorandum of Understanding' with Great Yarmouth Borough Council is reproduced in the Appendix of the 'Duty to Cooperate Statement for the Waveney Local Plan' which is available to view at <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Final-Draft-Local-Plan/Duty-to-Cooperate-Statement.pdf">www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Final-Draft-Local-Plan/Duty-to-Cooperate-Statement.pdf</a>.

## 7 Implementation, performance and delivery of the Suffolk Coastal and Waveney Local Plans

#### Appeal decisions

7.1 Appeal decisions provide a useful indicator as to how individual planning policies are performing, the overall performance of the development strategy and where they may need to be updated for example if they no longer reflect national policy or are not being interpreted as intended.

Appeal decisions	Suffolk Coastal	Waveney
Dismissed	51	20
Allowed with conditions	13	4
Allowed without conditions	8	1
Withdrawn	0	0
Partially Allowed	1	1
Total determined	73	26

- 7.2 The number of appeal decisions fell slightly from 2019/20, when the total determined appeals were 89 in Suffolk Coastal and 30 in Waveney.
- 7.3 In both the former Waveney and Suffolk Coastal area, none of the appeals decisions referenced any challenges to policies or inconsistencies with national planning policy.
- 7.4 Decisions where permission was refused partly or fully on design grounds were also robustly upheld in most cases; design remains a significant consideration for applications and appeals.
- 7.5 The high dismissal rate (about 70% for the former Suffolk Coastal area and 80% for the former Waveney area) shows that the Council was, overall, continuing to make 'correct' decisions on planning applications. Even in cases where appeals were allowed, it does not automatically mean that the Council got these decisions 'wrong' in many such cases, the Inspector simply reached a different planning judgment on the overall balance.

#### Local Plan policies not being implemented

- 7.6 Regulation 34 of the Local Planning Regulations 2012 requires local authorities to identify which of their policies are not being implemented, to state the reasons why, and identify the steps (if any) being taken to rectify this. Such policies may need to be amended or replaced, for example if they no longer reflect national guidance or are no longer relevant to the local area.
- 7.7 As Local Plans are spatial plans, policies are implemented partly through the determination of planning applications but also through other actions, for example supporting new infrastructure delivery (determined through Nationally Significant Infrastructure Projects) such as the Lake Lothing Third Crossing or provision of school places.
- 7.8 The Suffolk Coastal and Waveney Local Plans have only been in place for a relatively short period of time and there is currently no evidence of policies not being implemented as adopted.

  Supplementary Planning Documents are being prepared to add further detail on the implementation of a number of policies such as Historic Environment (adopted June 2021), Affordable Housing, Sustainable Construction and Coastal Adaptation. In addition, Residential Design Briefs are being prepared for a number of Local Plan allocations. Future AMRs will identify any policies not being implemented and actions required to address any issues.

#### **Employment**

- 7.9 This section provides information on the delivery of new employment land, the types of uses on existing employment areas and contextual data on employment, unemployment, earnings and qualifications.
- 7.10 Major changes were made to the Use Classes Order in September 2020, with the new Class E encompassing the former B1 use classes (offices, R&D and low-impact industrial processes), as well as various forms of retailing (formerly A1-A3), clinics and day centres (formerly D1) and gyms and indoor recreation (formerly D2). For the purposes of this AMR, employment and retail and leisure completion figures are reported against the use classes prior to the change as these are the use classes that the permissions were consented for, however, the new use class has been referenced for information. It is likely that a change to the reporting format will be in place for the next AMR. The reporting of results from the employment land and retail and town centres survey have been revised and are reported against the current (September 2020) use classes.
- 7.11 The employment and retail and town centres surveys were undertaken during May 2021. Some Covid restrictions were still in place during this time such as hospitality venues only able to serve people outdoors or as a takeaway service and continued closure of indoor venues such as cinemas and children's play areas. However, it was noted during the surveys a number of closed businesses were displaying notices setting out when they expected to re-open.

#### **Employment Land**

negative figures in the table below indicates a loss of floorspace/land area, normally due to redevelopment to a different use

Indicator	Use Class	Suffolk Coastal	Waveney	Link to
				further
				information
Amount and type of	B1a / E(g)(i)	0.27	0.31	East Suffolk
employment uses land	B1b / E(g)(ii)	0	0	Open Data
area completed within	B1c / E(g)(iii)	-0.02	-0.03	<u>Portal</u>
local plan area (net	B2	-0.70	-1.16	
figure, hectares)	B8	0.49	0.27	
Amount and type of	B1a / E(g)(i)	-17,175	1,541	East Suffolk
employment uses	B1b / E(g)(ii)	0	0	Open Data
floorspace completed	B1c / E(g)(iii)	-205	-434	<u>Portal</u>
within local plan area	B2	-7,012	-4,563	
(net figure, m <sup>2</sup> )	B8	6,896	2,974	
Percentage of uses	E(g)(i)	22.8%	7.8%	East Suffolk
within existing	E(g)(ii)	0.5%	0%	Open Data

Indicator	Use Class	Suffolk Coastal	Waveney	Link to further information
employment areas / allocations.	E(g)(iii) E(g) Unspecified	4.1% 8.7%	6.3% 3.8%	<u>Portal</u>
	B2 B8 Other uses Uncategorised	10.5% 18.2% 30.2% 4.9% (total of 21 sites)	22.4% 30.8% 28.9% 0% (total of 35 sites)	
Percentage of vacant units within existing employment areas / allocations.	Employment uses: E(g)/B2/B8 All uses	3.0% (18 of 609) 8.7% (53 of 609)	10.8% (82 of 760) 14.3% (109 of 760)	East Suffolk Open Data Portal

Employment use classes: B1a / E(g)(i) business office; B1b / E(g)(ii) research and development; B1c / E(g)(iii) light industrial; B2 general industrial; B8 storage or distribution

E(g) Unspecified category includes units unable to be distinguished between B1b / E(g)(ii) and B1c / E(g)(iii) uses from site surveys

Regarding the 'Uncategorised' use class, within the former Suffolk Coastal area it has not been possible to identify a use for a number of vacant units during site surveys.

The Port of Felixstowe covers an area of approximately 470 hectares - the employment land survey covers approximately 100 hectares. Bentwaters Park (Rendlesham) covers an area of approximately 382 hectares – the area to the north of the runway is surveyed and the majority of the land to the south of the runway is used for film/tv production. Adastral Park is the headquarters for BT and approx. 150 ICT companies and is not surveyed.

#### Suffolk Coastal Local Plan

7.12 In respect of employment land needs in the former Suffolk Coastal area, the Council worked with neighbouring authorities to compile a comprehensive evidence base focusing on the Ipswich Economic Area. The Ipswich Economic Area Sector Needs Assessment (2017) identified a growth of 7,940 new jobs over the period 2014-2036. Considering the jobs forecast and the past trends in take up of employment land, the study identifies a need for 14.4 hectares of new employment land to meet needs. The Local Plan recalculates these requirements to the plan period 2018-2036 and also includes land allocations which significantly over-provide to enable key economic activities to maintain and enhance their role and contribution to the national and local economies over the plan period.

- 7.13 Within the former Suffolk Coastal area, employment land is identified in towns and villages as well as a number of dispersed airfields. The mix of land allocated provides for a variety of functions to take place. The identification of employment land in rural locations complements the offer provided in the towns and significant areas of employment such as the Port of Felixstowe, Adastral Park and the edge of Ipswich. It is important to maintain a supply of employment land to facilitate investment and enterprise. This needs to be balanced against over-provision, restricting potential to meet other commercial or housing needs.
- 7.14 Within the former Suffolk Coastal area, 10,642m² of employment floorspace has been completed of which almost 7,000m² is for storage or distribution (Yew Tree Court, Framlingham and Deben Mill, Wickham Market). Employment floorspace losses total 28,138m² therefore the net loss of floorspace is 17,496m². Anzani House, a six-storey office building located within the Port of Felixstowe, has been demolished having been vacant for several years. The site will remain in employment use and is to be re-developed as a storage and distribution facility. 7,600m² floorspace (B2) has been demolished at Otley and the site is being re-developed for 35 dwellings and up to 900m² of business (B1/E(g)) floorspace.
- 7.15 As at 31<sup>st</sup> March 2021, full and outline planning consents permit 267,423m<sup>2</sup> floorspace (53 hectares) for employment uses, and losses of 9,317m<sup>2</sup> floorspace (1.9 hectares). None of the proposed losses are on protected existing employment areas.
- 7.16 Within the existing employment areas and allocated employment sites, almost a quarter of all units are use class E(g)(i) offices with storage or distribution uses (B8) accounting for 20% of units. However, (within the areas surveyed) the Port of Felixstowe, Bentwaters Park at Rendlesham and Martlesham Heath all have a high proportion of storage or distribution uses, given their good connectivity to rail and/or roads.
- 7.17 Neighbourhood Plans can allocate land for employment uses. Neighbourhood plans for Framlingham, Leiston, Martlesham and Melton include policies that allocate land either for standalone employment uses or as part of mixed-use employment development, albeit in relatively small quantities.

#### Waveney Local Plan

7.18 The Waveney Employment Land Needs update (2017) identified a growth of 5,000 new jobs over the period 2014-2036. Around 500 net new jobs will be in sectors requiring employment premises such as offices, factories and warehouses. Considering the jobs forecast and the past trends in take up of employment land, the study identified a need for 43 hectares of new employment land development and the Local Plan allocates enough land to deliver 53.6 hectares within the plan period. Policy WLP8.12 identifies existing employment areas and protects premises in employment uses (B1 (now E(g)), B2 and B8) from conversion and redevelopment to other uses.

- 7.19 This monitoring year, 5,696m² of employment floorspace has been completed, of which just over 3,560m² is on existing employment land. Employment floorspace losses this year³ (6,183m²) include the demolition of the former Ingate Ironworks in Beccles (approx. 2,700m²) for the construction of a retirement community including care home. There have also been a number of changes of use of small employment units within residential areas to dwellings. Although a net loss of 487m² employment uses floorspace is reported this year, this is an improvement on the net losses reported over the previous two years: 5,342m² (2019/20) and 1,764m² (2018/19).
- 7.20 As at 31<sup>st</sup> March 2021, full and outline planning consents permit 60,488m<sup>2</sup> floorspace (11.5 hectares) for employment uses, and losses of 1,882m<sup>2</sup> floorspace (0.5 hectares). None of the proposed losses are on protected existing employment areas.
- 7.21 Meeting the jobs forecast will be challenging but sufficient land has been allocated in the Local Plan and existing employment areas are protected. Policy WLP8.13 supports new employment development within existing employment areas and on adjacent land. In the rural areas, Policy WLP8.14 supports the conversion of rural buildings for employment use. Kessingland Neighbourhood Plan (2017) includes a requirement of up to 500m² B1 floorspace suitable for start-up businesses alongside residential development (Policy SA1).

#### **Employment Land Summary**

A net loss of 17,496m<sup>2</sup> employment floorspace has occurred in the former Suffolk Coastal area. Within the existing employment areas and allocated employment sites a net loss of 18,500m<sup>2</sup> is recorded; however, this equates to just under a hectare of employment land. E(g) light industrial uses make up over a third of uses within existing employment areas and allocated sites.

Across the former Waveney area, a net loss of 482m<sup>2</sup> employment floorspace has occurred. However, within existing employment areas and allocated employment sites a net gain of 831m<sup>2</sup> has completed. Within existing employment areas and allocated sites, 70% of units are occupied by employment uses, with B8 storage or distribution uses occupying almost a third of all units.

#### **Next steps**

- Improve intelligence and monitoring of jobs and job creation
- Work with landowners and the Economic Development team to ensure delivery of adequate amounts of employment land
- Explore funding opportunities to help deliver new employment land

<sup>&</sup>lt;sup>3</sup> Losses reported this year include 2,025m<sup>2</sup> B2 general industrial building demolished in 2019 (although the site remains in employment use) and not previously reported.

#### Employment, earnings and qualifications of working age population

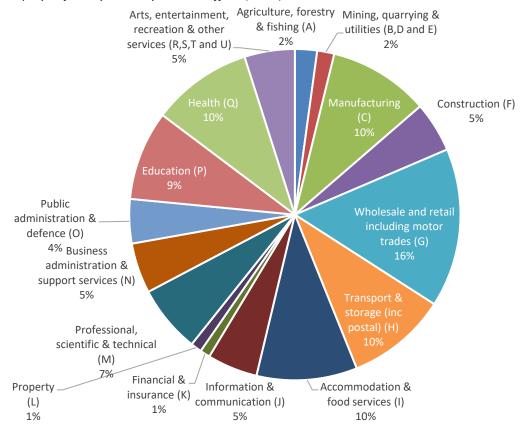
Indicator	East Suffolk	Link to further
		information
Jobs density <sup>4</sup> (2019)	0.79	NOMIS Official Labour
Employee jobs by industry (2019)	see chart below	Market Statistics
Employment by occupation (2021)	see chart below	<u>website</u>
Earnings Full time workers (median)	Residence: £30,181	
by residence and workplace (2020)	Workplace: £29,198	
Employment	95,200 (72.2%)	
(Apr 2020-Mar 2021)		
Unemployment	4,800 (4.6%)	
(Apr 2020-Mar 2021)		
Qualifications of working age	see chart below	
population (2020)		

Employment - numbers are for those aged 16 and over, % are for those aged 16-64

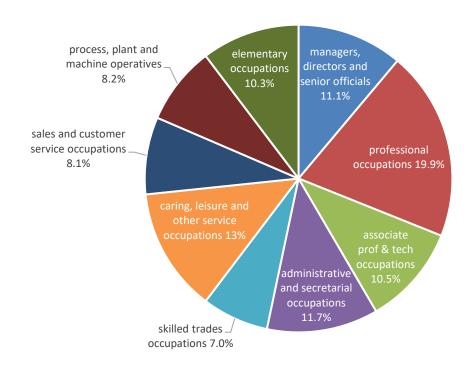
 $\underline{\text{Unemployment}}\text{-} \text{ numbers and } \% \text{ are for those aged 16 and over. } \% \text{ is a proportion of those economically active}$ 

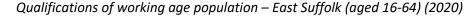
<sup>&</sup>lt;sup>4</sup> defined as the number of jobs in an area divided by the resident population aged 16-64 in that area. For example, a job density of 1.0 would mean that there is one job for every resident aged 16-64

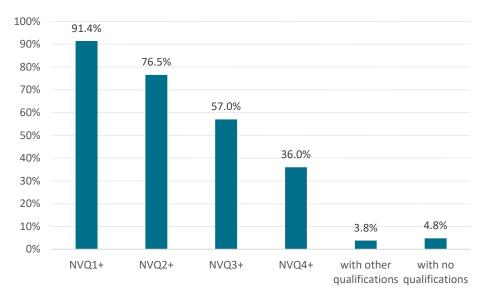
#### Employee jobs by industry – East Suffolk (2019)



Employment by occupation – East Suffolk (April 2020-March 2021)







- 7.22 The data above provides further economic contextual information. The largest employee jobs sector is wholesale and retail sale at 16% followed by manufacturing and transportation and storage the next largest sectors both at 10%. The majority of manufacturing businesses are located in the former Waveney area and transportation and storage business are related to the Port of Felixstowe in the former Suffolk Coastal area. East Suffolk figures on employment by occupation show a decrease of 2.2% of those employed as managers, professionals and associate professionals from the previous year and an increase of 6.67% of those employed in caring, leisure and retail sectors.
- 7.23 East Suffolk workplace (£29,198) and resident (£30,181) average earnings for full time workers are broadly similar. Both figures are marginally higher than for Suffolk and just below regional and national averages.
- 7.24 The unemployment rate in East Suffolk (4.6%) is similar to the East of England at 4.3%, and the national figure of 4.9%.
- 7.25 Freeports are designed to stimulate economic activity by offering tax benefits. In March 2021 the Port of Felixstowe alongside Harwich International Port were successful in their bid to become a designated freeport (Freeport East), becoming one of just eight freeports in the UK. The designation of Felixstowe Port as a freeport has the potential to provide economic and employment opportunities to east Suffolk.
- 7.26 The proposed development of Sizewell C nuclear power station would if permitted lead to enormous opportunities in construction, engineering and the related supply chains (although some of the negative impacts are also recognised), with thousands of jobs expected to be generated during the construction period, and hundreds of jobs during the operational phase. More information on this is available in the section on Nationally Significant Infrastructure Projects below.

#### Employment, earnings & qualifications Summary

East Suffolk has double the proportion of jobs in the transportation sector compared to the regional and national averages and above average for the manufacturing sector. Earnings are marginally higher than for Suffolk county and the unemployment rate just above the East of England figure.

Qualifications of the working age population in East Suffolk is comparable to Suffolk as a whole. Those with the highest level of qualifications (NVQ4+) at 36% is slightly lower than the England average of 43%.

#### **Next steps**

- Encourage inward investment to the district to encourage the take-up of allocated employment land in the two Local Plans for businesses to develop and grow successfully
- Encourage opportunities for training initiatives and apprenticeship schemes in locations well related to key employment sectors
- Encourage better paid jobs to be created across the district
- Continue to promote the District's involvement in the growing offshore renewable energy industry
- Continue to explore and promote the potential employment benefits of Sizewell C

#### Retail and Leisure

- 7.27 Town centres nationally are continuing to experience increasing competition from out-of-town retail and, in particular, from online shopping. This has led to reduced demand for retail floorspace within town centres, which in turn has led to a decline in many town centres. Town centres are rapidly changing from, primarily, places to shop to places where people spend leisure and recreation time. Many town centres are experiencing greater demand for food and drink premises and other leisure activities such as craft businesses. The Covid-19 pandemic has clearly impacted shopping and leisure habits, boosting the demand for online retailing further, but it is too early to say how this may alter land use patterns in town centres in the longer-term.
- 7.28 It is important for town centres to be able to address the continued changes in the retail and leisure sectors and to provide (or continue to provide) an offer/destination which makes them unique. East Suffolk Council has been, and is, responding to these pressures by working with local businesses and other stakeholders to better understand the pressures facing town centres and their communities through initiatives such as Felixstowe Forward (now completed), Leiston Together and Lowestoft Rising.
- 7.29 A new Use Class Order was introduced on 1st September 2020 by the Government, which amalgamated the A1 (Shops), A2 (Financial and professional services), A3 (Restaurants and cafes) and B1 (Business) use classes into a new use class, Class E. Class E also includes some D1 (Nonresidential institutions) and D2 (Assembly and leisure) uses. By amalgamating these previously distinct uses into one use class, it allows free movement of use changes within this new class without needing planning permission (subject to securing the necessary licencing for the business to operate, where applicable). In contrast to this, A4 (Drinking establishments) and A5 (Hot food takeaways), which are also considered 'town centre' uses, have been reclassified as 'sui generis' to provide greater planning control over their distribution. The stated intention of this is to increase flexibility to create a mix of uses and enable changes of use within town centres to take place more easily in response to changing trading conditions (without the need for planning permission). For the purposes of this AMR, retail and leisure completion figures are reported against the use classes prior to the change as these are the uses classes that the permissions were consented for, however, the new use class has been referenced for information. It is likely that a change to the reporting format will be in place for the next AMR. The reporting of results from the retail and town centres survey has been revised and are reported against the current (September 2020) use classes.
- 7.30 The retail and town centres surveys were undertaken during May 2021. Some Covid restrictions were still in place during this time such as hospitality venues only able to serve people outdoors or as a takeaway service and continued closure of indoor venues such as cinemas and children's play areas. However, it was noted during the surveys a number of closed businesses were displaying notices setting out when they expected to re-open.

- 7.31 The proportion of retail units occupied by charity shops can, to some extent, be an indicator of the retail 'health' of a town centre. Across the District's eleven town centres, 7% of retail units are occupied by charity shops. Halesworth town centre has the lowest percentage figure at 3.6% and Leiston the highest at 10%. These rates have not changed significantly over the past few years.
- 7.32 The Council, working in partnership with Lowestoft Town Council, Lowestoft Vision, Suffolk County Council and Suffolk Chamber of Commerce, have prepared the Lowestoft Town Centre Masterplan will help to support future opportunities for funding bids. The Lowestoft Town Investment Plan was submitted to Government in October 2020 and has been successful in securing £24.9 million to support regeneration projects over the next five years.

Indicator	Use Class	Suffolk Coastal	Waveney	Link to further information
Amount and type of retail and leisure development completed within local plan area (net figure, m <sup>2</sup> )	A1 / E (a) A2 / E (c) A3 / E (b) A4 / SG A5 / SG D2 / various	-462 504 48 -1,214 0 674	-2,086 163 63 0 256 -197	East Suffolk Open  Data Portal
Amount and type of retail and leisure development completed within town centres (net figure, m <sup>2</sup> )	A1 / E (a) A2 / E (c) A3 / E (b) A4 / SG A5 / SG D2 / various	-61 0 170 -611 0	-476 -142 213 0 0 -197	East Suffolk Open  Data Portal
Percentage of uses (at ground floor) within town centres	See charts below	v		East Suffolk Open  Data Portal
Percentage of vacant units (at ground floor) within town centres (as % of all units in commercial uses)	All uses (excluding C2 and C3 residential uses)	8.2% (65 of 795) (6 town centres ranging from 7.0% to 10.2%)	14.8% (133 of 896) (5 town centres ranging from 7.0% to 21.5%)	East Suffolk Open Data Portal

<u>Town Centres:</u> Aldeburgh; Felixstowe; Framlingham; Leiston; Saxmundham; Woodbridge; Lowestoft; Beccles; Bungay; Halesworth and Southwold

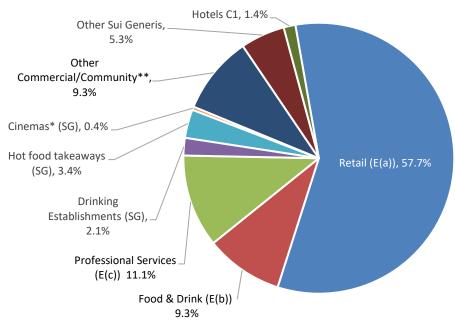
<u>Town centre uses:</u> retail (E(a)); financial and professional services (E(c)); food and drink (E(b)); drinking establishments (SG); hot food takeaway (SG); leisure (SG cinema; concert halls; bingo halls; dance halls).

Indicator	Use Class	Suffolk Coastal	Waveney	Link to further
				information

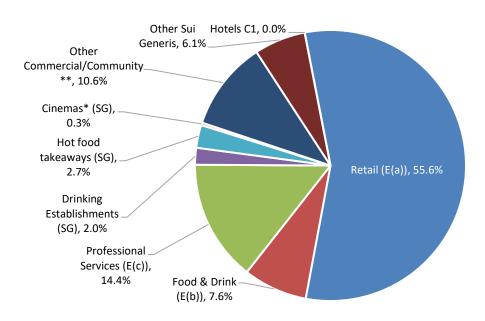
Other commercial/community uses includes B2 General Industrial, B8 Storage and Distribution, and remaining class Commercial, Business and Service (E uses) and Local Community and Learning (F use class).

<u>Other Sui Generis uses</u> - certain uses not falling within any use class e.g., bookmaker; beauty salon; tattoo studio; car sales; car repairs; veterinary surgery

Suffolk Coastal – percentage of units by use within town centres



Waveney – percentage of units by use within town centres

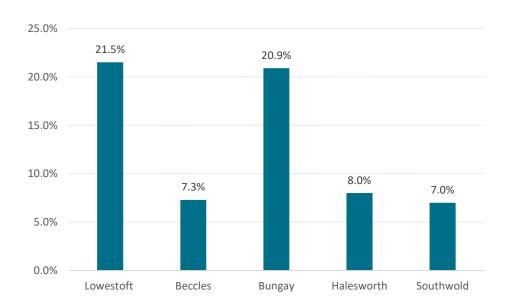


- \*Cinemas; concert halls; bingo halls; dance halls
- \*\*This includes use classes B2, B8, and remaining class E uses and F use class

#### Suffolk Coastal – vacancy rates in town centres



#### Waveney – vacancy rates in town centres



7.33 The People and Places Partnership Ltd were commissioned to help understand the issues being faced by East Suffolk's town centres. The aim of the research was to help identify strategic priorities and initiatives for the towns and inform future partnership work between East Suffolk Council and local stakeholders. The East Suffolk Towns Initiative (ESTI) is now developing and delivering town centre economic development solutions in line with the People and Places research through a set of agreed action plans. From these action plans, funding is being awarded to local groups for activity and projects that support the towns to become economically vibrant and achieve long term sustainability both for the local community, businesses and visitors. East Suffolk Council is also

working in partnership with local town centre organisations and businesses to provide support in the wake of the Covid-19 pandemic and developing a Digital Towns programme providing investment in businesses' digital skills as well as town centre infrastructure.

#### Suffolk Coastal Local Plan

- 7.34 The Council's updated evidence (Retail and Commercial Leisure Town Centres Study 2017) for the Ipswich Borough Council and former Suffolk Coastal area shows that by 2036, there will be a need for approximately 5,000sqm of convenience goods development and approximately 13,000sqm of comparison goods development with the most significant forecasts seen at Woodbridge and in areas east of Ipswich. It is anticipated that the floorspace growth is most likely to be met in Felixstowe, Ipswich and Woodbridge over the plan period as these are locations which are considered to have demand for additional retail capacity. The Council's approach is to support and monitor retail and town centre development and present a clear and comprehensible range of policies to support a balance of retail and services including commercial leisure in town centres.
- 7.35 The town centres are popular with tourists and visitors from nearby areas within and beyond the district. The towns have varying functions that benefit from a blend of shopping and leisure facilities supported by national retailers and chains alongside many specialist and artisan shops. The Suffolk Coastal Local Plan seeks to provide a balanced mix of town centre shops and services alongside out-of-centre retail destinations such as Martlesham and the neighbouring county town of Ipswich. Through policies which seek to secure retail activities and other town centre activities in appropriate locations, the Local Plan provides clear direction to enable town centres to evolve over the plan period.
- 7.36 Just over 1,900m² floorspace of town centre uses has been completed within the Suffolk Coastal local plan area this year, however, 2,377m² floorspace has been lost to other uses. The loss of drinking establishments floorspace accounts for half of all losses including the White Horse, Framlingham (change of use to 2 dwellings and the erection of 3 new dwellings) and the Three Tuns, Pettistree (change of use to dance studio and café).
- 7.37 Vacancy rates have slightly decreased in all town centres with the exception of Felixstowe which has seen an increase from 6.3% in October 2020 to 7.0% in May 2021. Leiston town centre had the highest vacancy rate during the reporting period at 10.2%, followed by Saxmundham, which had a vacancy rate of 9.3%. These high percentages suggest that Leiston and Saxmundham have the greatest issues with vacancy rates. Woodbridge and Felixstowe have a higher number of vacant units but these are a lower percentage of the overall number of town centre commercial units, suggesting that vacancies are less of a problem in these two town centres.
- 7.38 The table below shows the proportion of units in retail use in each town centre.

Town Centre	Number of units - all units (excluding C2 and C3 residential)	Number of units in retail use (E(a))	% of units in retail use
Aldeburgh	86	46	53.5%
Felixstowe	227	138	60.8%
Framlingham	94	51	54.3%
Leiston	88	45	51.1%
Saxmundham	97	51	52.6%
Woodbridge	203	128	63.1%

#### Waveney Local Plan

- 7.39 The Waveney Retail and Leisure Needs Assessment (2016) estimates that by 2032, there will be a need for at least another 2,197sqm of food store development and 11,063sqm of non-food types of retail development. However, the study states that forecasts of need beyond five years need to be treated with caution due to the uncertainties in expenditure growth forecasts and market share beyond this time-frame. The study forecasts need based on population growth and forecasts of expenditure on food and non-food products. It takes into account the amount of online shopping and the leakage to other centres such as Norwich. In the five-year period there is no need for new non-food retail and only a need for 850sqm of food store development.
- 7.40 1,160m² floorspace of town centre uses has been completed within the Waveney local plan area this year, however, 2,961m² floorspace has been lost to other uses. Most losses have occurred within the retail sector (2,300m²). Within the town centres the net loss is 600m² floorspace.
- 7.41 The Waveney Local Plan has a target of no more than 10% vacant units in any town centre or local shopping centre. Site surveys in May 2021 reveal vacancy rates above 10% in Bungay (20.9%) and Lowestoft (21.5%) town centres, which is an increase on the figures recorded in 2020. The Council has prepared a town centre master plan to help guide regeneration within Lowestoft town centre. More detailed work is ongoing to create concept statements for specific parts of the town centre, including the Station Quarter and the Cultural Quarter, which is located in the area around the former Battery Green car park and the Marina Theatre. Regeneration of Lowestoft town centre will provide new uses and reduce vacancy rates over time, through increasing footfall. Halesworth has seen a 4% decrease and now has a vacancy rate of 8%. The vacancy rates in Beccles and Southwold have also had a small decrease to 7.3% and 7% respectively.
- 7.42 The table below shows the proportion of units in retail use in each town centre.

Town Centre	Number of units - all	Number of units in	% of units in retail use
	units (excluding C2	retail use (E(a))	
	and C3 residential)		
Lowestoft	368	176	48%
Beccles	218	129	59%
Bungay	110	69	63%
Halesworth	100	60	60%
Southwold	100	64	64%

#### **Retail and Leisure Summary**

The town centre surveys show that within the former Suffolk Coastal area town centres there has been an increase in retail and office uses and but a small contraction of cafes/restaurants. Pubs and hot food takeaways have remained the same.

Within the former Waveney area town centres there has been an increase in retail and cafes/restaurants, but a small contraction of office use. Pubs and hot food takeaways have also remained the same. Vacancy rates within Lowestoft and Bungay are double the target maximum vacancy rate of 10% identified in the Waveney Local Plan.

#### **Next steps**

- Improve town centres as destinations
- Provide support for the People and Places Town Centre Project
- Provide support for the area-based initiatives such as Leiston Together and Lowestoft
   Place Board
- Work with the Economic Development Team to develop regeneration strategies such as the North Lowestoft Heritage Action Zone for parts of town centres that suffer from high vacancy rates and poor-quality environment
- Implement the Lowestoft Town Centre Masterplan in cooperation with the local community and other stakeholders including Suffolk County Council Highways, Waveney Chamber of Commerce, East Suffolk Building Preservation Trust, Lowestoft Town Council and Lowestoft Vision

#### **Tourism**

- 7.43 Tourism is an important part of the East Suffolk economy, and the District has many types of visitor destinations and attractions. Alongside the natural and environmental attractions such as the Heritage Coast, Area of Outstanding Natural Beauty and historic market towns, events such as hosting stages of the Tour of Britain/Women's Tour cycling road races, Latitude Festival and the First Light Festival draws visitors from both within and outside of the district. Trips within the district and from neighbouring districts for shopping and leisure purposes may also be considered as tourism. The overlap with town centre and retail policies is demonstrated in a growing emphasis on leisure and the experience of town centre users.
- 7.44 Clearly the Suffolk tourism market was heavily affected in 2020/21 by the effects of the Covid 19 pandemic, but anecdotal evidence is that the 2021 summer season was very much better.

Indicator	Suffolk Coastal	Waveney	Link to further information
Applications permitting new / loss of	37 New	15 New	-
tourist accommodation &	0 Loss	1 Loss	
development			

#### Suffolk Coastal Local Plan

- 7.45 The Suffolk Coastal Local Plan includes policies which seek to encourage and protect tourism uses across the district, including a strategic policy (Policy SCLP6.2) which supports tourism destinations that contribute to the broad appeal, accessibility and year-round nature of tourism across the district. This policy seeks to provide general support to the wider range of tourism facilities and destinations that are found in the district. The Suffolk Coastal Local Plan also contains area specific policies which focus on the Felixstowe Seafront (Policies SCLP12.11 to SCLP12.15).
- 7.46 Within the former Suffolk Coastal area, the majority of consents for new tourism uses propose single units of self-catering accommodation of which a number are for the conversion of barns or outbuildings into new uses. Two permissions, one at High Lodge, Darsham, the other at Kesgrave Hall will result in an addition 170 holiday lodges and 27 new hotel rooms respectively. A further 14 permissions are for upgrading/replacement or additional facilities to existing tourism sites, intensification by increasing the number of units / pitches or changes to the occupancy period.

#### Waveney Local Plan

7.47 Within the former Waveney area, consents for new tourism uses are for self-catering accommodation (including barn conversions) and camping sites mainly in the rural areas, with one application in Ellough for 35 holiday lodges. The Royal Court Hotel in Kirkley has been vacant for a number of years and this year permission was granted for change of use to a café (retaining a

commercial frontage within the district shopping centre) and 15 self-contained flats representing a tourism loss.

#### **Tourism Summary**

It is recognised that tourism is a key contributor to the local economy and supports a high proportion of employment opportunities. The Local Plans provide support for new tourism activities in sustainable locations to ensure that tourism opportunities are retained, protected, enhanced and encouraged in a plan led manner. A variety of new and updated tourism uses across a number of locations across the whole of East Suffolk show that tourism continues to play a significant role in the district's economy and development and construction sectors. The Council is welcoming of tourism activities and will continue to facilitate tourism activities with partners.

#### **Next steps**

- Continue to monitor the impact of tourism and its contribution to the district's economy
- Safeguard and retain tourism uses
- Support the work of place-based initiatives such as Leiston Together and Lowestoft
   Rising
- Provide support for the Council's programme to deliver seafront projects along Lowestoft South Beach

#### Housing

7.48 This section reports on progress on delivery against the Council's housing targets including net housing completions, the location of new housing in relation to the settlement strategy, affordable housing and Gypsy and Traveller sites.

#### **Housing completions**

Indicator	Suffolk Coastal	Waveney	East Suffolk	Link to further information
Net additional homes completed	511	201	712	East Suffolk Open Data Portal
Affordable homes completed (subset of net additional homes completed)	90	42	132	East Suffolk Open Data Portal
Gypsy and Traveller pitches permitted / completed (subset of net additional homes completed)	0 permitted 0 completed	0 permitted 0 completed	0 permitted 0 completed	-
Total housing delivered within plan period (plan period date)	1,759 (2018-2036)	1,473 (2014-2036)	N/A	East Suffolk Open Data Portal

#### Suffolk Coastal Local Plan

7.49 The Suffolk Coastal Local Plan (September 2020) identifies a need for at least 9,756 new homes over the plan period (2018-2036). Housing completions this monitoring year totalled 511, a drop of 150 dwellings on the previous year, and likely a symptom of the difficulties within the building trade caused by the pandemic in particular during the early part of the monitoring year. However, over the first three years of the plan period the average number of dwellings completed is 586, above the requirement of 542 per year.

Suffolk Coastal housing completions 2018-21

2018/19	2019/20	2020/21
588	660	511

7.50 A total of 90 affordable homes were completed during the monitoring year, accounting for almost 18% of all housing completions. 23% of all housing completed between 2018-21 is affordable

housing (412 of 1,759 new homes). All new housing developments of 10 or more dwellings or on sites of 0.5ha or more must make provision for 1 in 3 of the total dwellings to be affordable.

Suffolk Coastal affordable housing completions 2018-21

2018/19	2019/20	2020/21	
125	197	90	

7.51 The provision of housing for older people within residential institutions (C2) can be included in housing land supply and housing delivery figures. The contribution is based on the accommodation released in the housing market<sup>5</sup>. The figures below are in addition to the housing completions reported above.

Suffolk Coastal care homes completions (equivalent dwellings) 2018-21

2018/19	2019/20	2020/21
6	0	-4

7.52 The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) identifies a requirement for 15 pitches over the period 2016 – 2036. No additional pitches have been permitted or completed during the monitoring period however this is reflective of planning applications not being submitted.

#### Waveney Local Plan

7.53 The Waveney Local Plan identifies a need for 8,223 new homes over the plan period, 2014-2036. This equates to an annual requirement of 374 new homes per year; however, delivery has only averaged 211 dwellings per year. This is a shortfall of 1,145 homes over the period 2014-2021.

Waveney total housing completions 2014-21

2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
136	135	264	284	297	156	201

NB 2020/21 completion figure revised from 159 as reported in last year's AMR to account for loss of 3 dwellings due to demolition

7.54 27% of all housing completed between 2014-21 is affordable housing (401 of 1,473 new homes). All new housing developments of 11 or more dwellings must make provision for a proportion of the total dwellings to be affordable. The provision ranges from 20% to 40%, based on defined affordable housing areas (Policy WLP8.2 Affordable Housing).

<sup>&</sup>lt;sup>5</sup> The ratio applied is 1.8 to 1 i.e. for every 1.8 bed spaces in an institution, 1 housing unit is assumed.

Waveney affordable housing completions 2014-21

2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
24	13	88	120	89	25	42

- 7.55 The Waveney Local Plan allocates approximately 12% more homes than the minimum level required to help enable more affordable homes to be delivered and ensure the objectively assessed need will be met if some allocations fail to come forward or there is a delay in delivery (Policy WLP1.1 Scale and Location of Growth).
- 7.56 The provision of housing for older people within residential institutions (C2) can be included in housing land supply and housing delivery figures. The contribution is based on the accommodation released in the housing market<sup>6</sup>. The figures below are in addition to the housing completions reported above.

Waveney care homes completions (equivalent dwellings) 2014-21

2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
0	-21	4	7	38	13	5

7.57 The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) identifies a requirement for 17 additional Gypsy and Traveller pitches in Waveney over the period 2016-2036, and this provides the context for Policy WLP8.5 Gypsy and Traveller Sites. No additional pitches have been permitted or completed during the monitoring period however this is reflective of planning applications not being submitted. WLP8.5 provides a criteria-based policy to support such development both within settlement boundaries and within the Countryside and to date 4 pitches have been provided (2018/19 monitoring period).

#### Housing types and sizes

Indicator	Suffolk Coastal	Waveney	Link to further information
Type and size of completed dwellings (gross completions)	See charts below		East Suffolk Open Data Portal
Number and percentage of affordable housing completed by tenure. (subset of net additional homes completed)	See charts below		East Suffolk Open Data Portal
Affordable housing on	7 relevant	4 relevant	-

<sup>&</sup>lt;sup>6</sup> The ratio applied is 1.8 to 1 i.e. for every 1.8 bed spaces in an institution, 1 housing unit is assumed.

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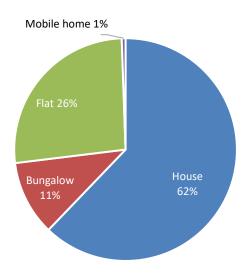
Indicator	Suffolk Coastal	Waveney	Link to further information
residential developments (permissions)	applications providing 127 affordable homes of a total 138 required	applications providing 12 affordable homes of a total 58 required	
Number of refusals for self- contained flats / HMOs within flat saturation zones as identified on Polices Map	N/A	1 relevant application submitted and refused	-
Net additional bedrooms in C2 care homes	-8	9	-

Types and size of completed dwellings (gross completions) – gross completions does not account for losses such as demolitions.

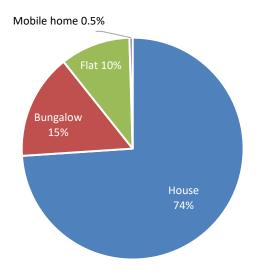
<u>Affordable housing on residential developments:</u> the requirement for the Suffolk Coastal Local Plan is for sites with a capacity for 10 or more units or sites of 0.5ha to make provision for 1 in 3 units to be affordable dwellings; the requirement for the Waveney Local Plan is for sites with a capacity for 11 or more units to make provision of 20%, 30% or 40% affordable dwellings based on locality.

#### Completed dwellings by type

Suffolk Coastal (543 gross completions)



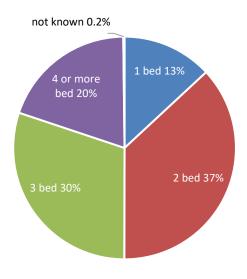
Waveney (215 gross completions)



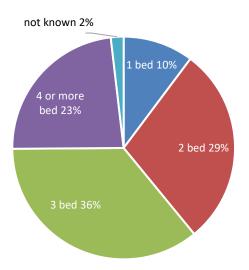
#### Completed dwellings by number of bedrooms

Note: not known category includes caravans / mobile homes or certain types of application such as certificate of lawful use or prior approval.

Suffolk Coastal (543 gross completions)

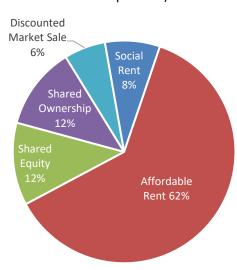


Waveney (215 gross completions)

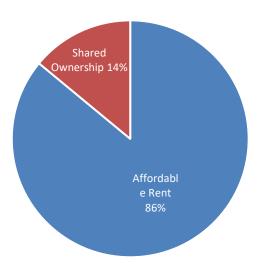


#### Affordable housing completed by tenure

Suffolk Coastal (90 net affordable completions)



### Waveney (42 net affordable completions)



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#### Suffolk Coastal Local Plan

- 7.58 The Suffolk Coastal Local Plan sets out the size of dwellings that should be delivered as a percentage of the overall need for housing (Table 5.1). The percentages for two and four bedroom dwellings achieved during 2020/21 (37% and 20% versus a need for 29% and 33%) show that delivery has not matched expectations for some types of dwellings, however Policy SCLP5.8 Housing Mix expects a focus on 1 and 2 bedroom dwellings and it is evident that half of dwellings completed fall within this size.
- 7.59 62% of the affordable homes completed were for affordable rent. This is a higher percentage than that identified in the Suffolk Coastal Local Plan Policy SCLP5.10 which sets out that 50% should be for affordable rent/social rent and 25% for shared ownership and 25% for discounted market sale (Policy SCLP5.10), however it should be acknowledged that these developments would have been approved under former policies.
- 7.60 Eight applications approved this monitoring year are required to provide affordable housing (preferably on-site), of these, three applications do not do so; one application is approval of reserved matters that when originally permitted at outline stage did not require on-site affordable housing as the threshold was for 11 or more dwellings (10 dwellings Bredfield); a viability assessment sufficient to discount an affordable housing requirement (14 dwellings, Felixstowe) and the final application secures a contribution to be paid prior to the first occupation of the 6<sup>th</sup> dwelling (11 dwellings, Orford).
- 7.61 The Strategic Housing Market Assessment (2017) identifies a need for 1,118 additional spaces in care homes and nursing homes to 2036. The Local Plan addresses the needs of an ageing population in a number of ways including through the provision of accessible and adaptable dwellings as part of the housing mix and a number of site specific allocations requiring housing to meet the needs of older people. Overall a net loss of 8 bedrooms in care homes has been recorded this monitoring year. An extension to a care home in Woodbridge has provided an additional 12 bedrooms however a 20-bedroom nursing home in Felixstowe has been converted to 8 flats.

#### Waveney Local Plan

- 7.62 86% of affordable homes completed this monitoring year are affordable rent. This generally reflects the policy approach of the previous Local Plan which set out that the majority of affordable housing should be social rent and not more than 10% for intermediate tenures including rent and shared equity. It is expected that future delivery of affordable housing will more generally reflect the approach in Policy WLP8.2 with 50% of affordable housing provision for affordable rent and 50% for intermediate housing tenures.
- 7.63 Policy WLP8.2 Affordable Housing requires all new developments of 11 or more dwellings to provide affordable housing, preferably on site. Four relevant applications were permitted during the monitoring year of which a total 58 affordable homes are expected to be provided however only 12

have been permitted/secured. One application for approval of reserved maters for 150 dwellings in Bungay would under current policy require 45 on site affordable dwellings and only 8 are being provided. The viability report submitted at the time of the outline application concluded no more than 5% affordable housing could be provided. A full application for 30 retirement apartments (Lowestoft) has provided a viability assessment sufficient to discount an affordable housing requirement. The conversion of a vacant hotel in Lowestoft to 16 originally proposed flats would require 3.2 dwellings but vacant building credit results in 0.965 affordable dwellings. The applicant reduced the number of proposed flats to 15 however proposing the same contribution of 1 affordable dwelling secured as a contribution (1 dwelling) to be paid within 28 days of commencement of works.

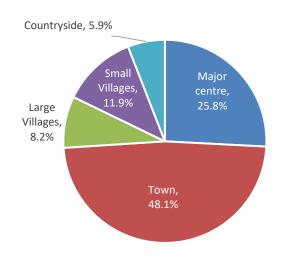
7.64 The Strategic Housing Market Assessment (2017) identifies a need for 905 additional spaces in care homes and nursing homes over the plan period of which the majority will be delivered on larger allocations. The Local Plan does not have a specific policy for this sector. This monitoring year, a 9-bedroom extension has been completed at an existing care home in Lowestoft. Over the plan period (2014-21) a net gain of 82 bedrooms within care homes has been recorded.

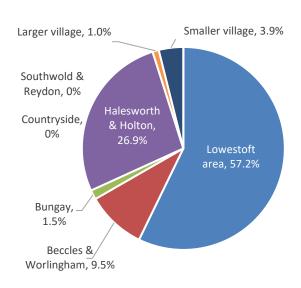
## Location of new housing

Indicator	Suffolk Coastal	Waveney	Link to further information
% of housing development by settlement hierarchy	See charts b	oelow	-
% of housing development in the countryside - outside of settlement boundaries (Local Plans and Neighbourhood Plans)	12%	32%	-
% of residential development in Lowestoft and the market towns achieving at least 30 dwellings per hectare [new build developments of 10 or more when wholly complete]	N/A	0% (0 of 1 schemes)	-
% of new housing completed on previously developed land	32% (161 of 511)	29% (59 of 201)	-

% of housing development by settlement hierarchy 2020/21







#### Suffolk Coastal Local Plan

- 7.65 Policy SCLP3.2 Settlement Hierarchy of the Suffolk Coastal Local Plan identifies the settlement hierarchy across the plan area, taking into account the role of each settlement. Table 3.3 of the Local Plan sets out the percentage of newly identified housing growth to come forward within the different settlement types across the Local Plan area, and Table 3.5 sets out the percentages of all anticipated housing growth to come forward on a parish by parish basis.
- 7.66 32% of new housing completed this monitoring year is on previously developed land, an increase on the 14% recorded in the previous year despite the lack of a supply in terms of large brownfield sites. The brownfield developments comprise a mix of single dwelling sites and larger developments.
- 7.67 The Council's Local Plan evidence base, including updates of the Strategic Housing and Economic Land Availability Assessment, has consistently shown that the available supply of brownfield sites in the former Suffolk Coastal area to be modest and concentrated away from the towns and 'A' road and rail routes at former and underused airfields in rural locations. Whilst there is generally a divergence between the distribution of brownfield land and the Local Plan settlement hierarchy that identifies the most sustainable settlements for growth in the district, the Local Plan has taken opportunities to allocate brownfield land where appropriate such as the Police Headquarters site in Martlesham.

#### Waveney Local Plan

7.68 Policies WLP1.1 and WLP7.1 set out the scale and location of growth in the former Waveney area with half (56%) of future development allocated to Lowestoft as the largest town with its potential for economic growth. This monitoring year housing delivery meets the housing growth expectations

for Lowestoft, whilst across the market towns delivery has been slightly higher at 39% and lower in the rural areas at 5%. Over the plan period as a whole, it is anticipated that housing delivery will be consistent with the distribution strategy.

- 7.69 Policy WLP8.32 Housing Density and Design expects residential development to make the best use of the site whilst protecting or enhancing the distinctiveness and character of the area. Development in and around the built-up area of Lowestoft and the market towns should aim for urban scale development of at least 30 dwellings per hectare. This monitoring year, just one scheme of 10 or more dwellings has completed within the relevant areas and achieves a density of 28 dwellings per hectare. The completed scheme is for sheltered housing units within grounds of retirement village/care home in Carlton Colville.
- 7.70 29% of all new housing completed this monitoring year is on previously developed land, this is a reduction from 50% of completions in the previous year. This reflects the higher number of completions on larger greenfield sites this year and is expected to continue at this reduced level as the majority housing allocations in the Local Plan are on greenfield sites, reflecting the complexities with delivery of new housing on brownfield sites. 20% of new homes allocated are on previously developed land including 1,380 at Kirkley Waterfront and Sustainable Urban Neighbourhood (Policy WLP2.4).

### **Housing Commitments**

7.71 Within East Suffolk almost 8,000 new homes have planning permission (either outline or full consent) as at 31<sup>st</sup> March 2021. 978 new homes are under construction.

Geographic area	Total commitments	Full consent	Outline consent	Market housing	Affordable housing
Suffolk Coastal Local Plan area	4,919	1,916	3,003	3,764	1,155
Waveney Local Plan area	2,848	1,965	883	2,207	641
East Suffolk	7,767	3,881	3,886	5,971	1,796

7.72 More information on these planning consents can be found on the <u>East Suffolk Open Data Portal</u>.

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

7.73 National policy requires local planning authorities to identify and update annually a supply of specific, deliverable sites, sufficient to provide five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The supply is required to include a 5% buffer to ensure choice and competition in the market for land or a 20% buffer where there has been a persistent under delivery of housing as evidenced through the Housing Delivery Test (National Planning Policy

- Framework para. 74). For sites to be considered deliverable they should be available now, offer a suitable location for development now, be achievable with a realistic prospect that housing will be delivered on the site within the five years.
- 7.74 The Suffolk Coastal Local Plan sets out a housing requirement of 542 dwellings per year over the period 2018 2036. The Waveney Local Plan sets out a housing requirement of 374 dwellings per year over the period 2014 2036. The 2020 Housing Delivery Test result for East Suffolk was 109% and therefore the 85% threshold for delivery has been exceeded meaning that a 5% buffer is applied in this year's assessment.
- 7.75 The East Suffolk Statement of Housing Land Supply 2021 confirms (as at 31<sup>st</sup> March 2021):
  - The Suffolk Coastal Local Plan area of East Suffolk has a housing land supply of 6.52 years.
  - The Waveney Local Plan area of East Suffolk has a housing land supply of 5.74 years.
- 7.76 Further information can be found at <a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/</a>

## **Housing Delivery Test and Housing Action Plan**

- 7.77 The Housing Delivery Test was introduced by the Government in 2018 and assesses how successful each Local Authority has been at supplying the required number of houses in the previous three financial years. In Local Planning Authority areas where less than 95% of the required housing has been delivered over the past three years, authorities must produce a Housing Action Plan. Where less than 85% of the requirement was delivered there is an additional requirement to apply a 20% buffer in calculating the 5-year housing land supply. Where less than 75% is delivered the 'presumption in favour of sustainable development' would apply in decision making although this specific requirement has been phased in with a 25% threshold applying to the February 2019 results and 45% threshold applying to the November 2019 result.
- 7.78 The first set of results of the Housing Delivery Test were published in February 2019, covering the period 2025/16-2016/18, and relate to the areas covered by the Council's Plans. The result for the former Suffolk Coastal area was 128% and for the former Waveney area was 72%. The result required no further action to be taken for the former Suffolk Coastal areas and the former Waveney area to produce a Housing Action Plan and apply a 20% buffer when calculating the 5-year housing land supply.
- 7.79 The first East Suffolk Housing Action Plan was published in August 2019. As both areas are within East Suffolk, and in view of the corporate objectives surrounding housing delivery and the desire to ensure strong delivery is maintained across East Suffolk, the Housing Action Plan covers the whole of East Suffolk local planning authority area.

- 7.80 The second set of Housing Delivery Test results, covering the period 2016/17-2018/19, were published in February 2020. The result for the former Suffolk Coastal areas is 127% and for the former Waveney area is 89%. The improvement for the former Waveney area in achieving a result of 89% has meant that a 5% buffer can be applied in calculating the 5-year housing land supply. The result still required a Housing Action Plan to be produced for the former Waveney area and this was updated in August 2020.
- 7.81 The third Housing Delivery Test result, covering the period 2017/18 2019/20, was published in January 2021 and relates to East Suffolk (not the former Suffolk Coastal and Waveney Districts separately). The result for East Suffolk is 109% and is the first time the area has been assessed as a recently reorganised authority. Following the publication of 2020 Housing Delivery Test results no further action is required by East Suffolk Council.
- 7.82 Regardless of future Housing Delivery Test results, East Suffolk Council intends to produce an annual Housing Action Plan as a 'tool' to check the progress and success of actions to secure housing delivery and enable to Council to take early steps to minimise any future risk of under delivery. A third Housing Action Plan has been published in August 2021 (outside of the current AMR monitoring period). The Housing Action Plan and further information can be found at <a href="https://www.eastsuffolk.gov.uk/planning/housing-action-plan/">www.eastsuffolk.gov.uk/planning/housing-action-plan/</a>.

#### Self build and custom build register

- 7.83 The Self-Build and Custom Housebuilding Act 2015 (as amended) places a duty on local councils in England to keep and have regard to a register of people who are interested in self build or custom build projects in their area. Registers help inform councils of the level of demand for self build and custom build plots in their area and develop a strategy for providing plots. The Council has three years in which to grant sufficient development permissions to meet the need recorded on the register in a 'base period'. Beginning in 2015, a base period begins on 31<sup>st</sup> October and finishes on 30<sup>th</sup> October the following year. Please note that the Authority Monitoring Report uses financial years and not base periods for the purposes of its monitoring.
- 7.84 In light of the Self-Build and Custom Housebuilding Act 2015 (as amended), both the Waveney Local Plan and the Suffolk Coastal Local Plan include a policy approach to meet the needs identified on the Council's register. This includes policies WLP8.3 and SCLP5.9 which specifically support proposals for self / custom build plots and require developments of 100 or more dwellings to provide 5% self or custom build properties.

Indicator	Suffolk Coastal	Waveney	East Suffolk	Link to further information
Number of entries on self	N/A	N/A	479	East Suffolk Self
build / custom build				<b>Build and Custom</b>
register as at 31st March				Build webpage

Indicator	Suffolk Coastal	Waveney	East Suffolk	Link to further
				information
2021				
Number of plots approved	58	10	68	East Suffolk Self
for self or custom build				<b>Build and Custom</b>
(2020/21)				Build webpage
Developments of 100 or	No relevant app	lications	-	
more dwellings to provide	determined this	year		
5% self or custom build				
properties (2020/21)				

<u>Number of plots approved for self or custom build:</u> Approvals can be via planning permission for self or custom build plots or plots which have been granted self build CIL relief

- 7.85 68 custom and self build plots were given permission across East Suffolk during the monitoring period. However, a further 89 single new dwellings were given permission during the monitoring period. Given the ability to claim CIL relief for self build homes, it is likely that a significant number of these single dwellings will be self build projects, suggesting that the overall number of self build developments being delivered will in fact be significantly higher.
- 7.86 Further information on self build and custom housebuilding can be found at <a href="https://www.eastsuffolk.gov.uk/planning/self-build-and-custom-build/">www.eastsuffolk.gov.uk/planning/self-build-and-custom-build/</a>

## Other housing indicators

Indicator	East Suffolk	Link to further
		information
Population estimates (mid-year 2020)	250,373	ONS population estimates
Homelessness - total households assessed	1,124 households	MHCLG Homelessness
and total households assessed as owed a duty	assessed, 1,120	<u>statistics</u>
(Apr 2020-Mar 2021)	assessed as owed	
	a duty	
Housing affordability - Ratio of median house	8.39	ONS Housing affordability
price to median gross annual (where		
available) workplace-based earnings (2020)		
212		

<u>Homelessness</u> - Prevention duties include any activities aimed at preventing a household threatened with homelessness within 56 days from becoming homeless. Relief duties are owed to households that are already homeless and require help to secure settled accommodation

7.87 The data above provides further contextual information relating to housing provision. The population of East Suffolk has been increasing and is projected to continue to increase over the lifetime of the Local Plans, as reflected in housing requirements.

- 7.88 Data on homelessness for 2020/21shows that 1,120 households were assessed as owed a duty, of which 484 households owed relief duty within East Suffolk. The figures for the previous year showed 1,541 households assessed with 1,511 households owed a duty, of which 498 owed relief duty. The delivery of new housing and affordable housing contributes to addressing this, alongside the role of the Council's Housing Service.
- 7.89 Historically, the ratio of house prices to earnings in the former Suffolk Coastal part of East Suffolk has been higher than in the former Waveney area. Affordability ratios for the former districts have also been published for 2020 and show a ratio of 9.4 for the former Suffolk Coastal area and 7.47 for the former Waveney area<sup>7</sup>. Details of the amount of affordable housing provided are set out in the sections above.

## **Housing Summary**

Housing completions in the former Suffolk Coastal area are above the Local Plan requirement over the plan period to date. In the former Waveney area, despite housing completions generally increasing year on year, there has been under delivery across the plan period. However, completions on allocated sites, particularly in Beccles and Bungay, are now coming forward and should help to increase delivery overall.

The most recent Housing Delivery Test results, covering the period 2017/18 to 2019/20 is the first set of results for East Suffolk and although no further action is required, the Council is committed to maintaining its annual Housing Action Plan as a tool to assist with supporting housing delivery. The East Suffolk Local Plans set out allocations to meet and exceed housing need over the period to 2036, and it is expected that through the implementation of these the housing needed will be delivered.

The affordability of housing remains an issue within East Suffolk, and affordable housing continues to be delivered through Council's planning policies, and completions have predominantly provided affordable housing for rent. To meet the identified district wide requirements, it is anticipated that in future years a greater proportion of affordable ownership tenures will be provided. In November and December 2020 the Council undertook an initial consultation to inform the scope and content of the Affordable Housing Supplementary Planning Document and has in November 2021 published the draft Supplementary Planning Document for a six week public consultation. Adoption of the SPD is anticipated in Spring 2022.

A supply of at least five years' worth of housing land can be demonstrated across East Suffolk, consistent with national policy requirements. This demonstrates that permissions are being granted, and allocations made, to help enable development to come forward.

<sup>&</sup>lt;sup>7</sup> <u>House price to workplace-based earnings ratio for former local authorities 2019 to 2020 - Office for National</u> Statistics (ons.gov.uk)

- Continue to monitor the supply of housing land in the District through the <u>Statement of Housing Land Supply</u>
- Implement the actions contained in the <u>East Suffolk Housing Action Plan</u> (published August 2021), and review as necessary
- Preparation of an Affordable Housing Supplementary Planning Document (adoption expected Spring 2022)
- Continue to maintain the <u>Brownfield Land Register</u> (update by December 2021)
- Continue to maintain the <u>East Suffolk Self Build Register</u> and develop ways to match people on the Register to self and custom build plots within the District

# **Transport**

- 7.90 This section provides information on the delivery of transport measures and the implementation of parking standards in developments across East Suffolk.
- 7.91 Although not a Highway Authority, the Council has a role to play in ensuring transport initiatives and measures are implemented in consultation with Highways England and Suffolk County Council (the Highway Authority). The requirement to include Travel Plans and Transport Statements as part of planning applications based on thresholds are typically used by planning authorities to implement such measures, and this is reflected in the Council's development management policies.
- 7.92 Due to Covid travel restrictions during 2020, traffic count data is not comparable to previous years. The Department for Transport states that "Vehicle miles travelled in Great Britain have had year-on-year growth in each year between 2010 and 2019. However, the sharp decrease in 2020 has resulted in traffic estimates that are lower than the 2010 levels." During 2020 there was a marked increase in the use of pedal cycles of 5 billion vehicle miles (bvm) compared to 3.5 bvm in 2019, and conversely a reduction of travel by bus/coach from 2.4 bvm to 1.6 bvm.
- 7.93 Travel to work and means of travel is sourced from the Census and the current available data is ten years old and it is expected some Census data will be released in spring 2022. The longer-term effects of the COVID-19 pandemic on working patterns will emerge over the coming years.
- 7.94 Both Local Plans contain polices to support new housing development in sustainable locations, encourage the use of sustainable means of transport and provide support to the telecommunications industry to maximise the use of super-fast broadband which could assist with home working.
- 7.95 Work is progressing on an East Suffolk Cycling and Walking Strategy. An initial map-based consultation to identify issues and suggest solutions was held between 19 October and 7 December 2020. Almost 800 comments were received which can be viewed on the <a href="mailto:online map of matters/opportunities raised">online map of matters/opportunities raised</a> and a draft document has been published for consultation in November 2021.

Indicator	Suffolk Coastal	Waveney	Link to further information
Number of applications permitted	0 of 8 applications	1 of 4 applications	-
which are contrary to Suffolk County	reviewed	reviewed	
Council Parking Standards			
	/40		1

Assessment of major residential applications (10 or more dwellings) based on the formal consultation response from Suffolk County Council Highways Department

## Suffolk Coastal Local Plan

7.96 A review of the eight major residential planning applications granted this year found that none were permitted contrary to the formal Highway Authority consultation response. This demonstrates that the standards are achievable and policy SCLP7.2 Parking Proposals and Standards is serving its function in this regard.

### Waveney Local Plan

7.97 Four applications for major residential development were granted this monitoring year of which one was approved subject to a Highway Authority objection. The application related to the construction of a 3/4 storey building comprising 31 x 1-bed flats with under croft parking providing 14 car parking spaces and 45 cycle spaces. The SCC parking standards requires 31 car parking spaces and 61 cycle spaces. The application was approved as it was considered the proposal provided a balance of some vehicle parking, some provision of secure cycle storage, and relying on the sustainable location (Lowestoft) of the site and good pedestrian and public transport links. Therefore, there was no reason to refuse permission on highways grounds, and the proposal accords with the sustainable transport objectives of WLP8.21.

## **Cycling and Walking**

7.98 The Waveney Cycle Strategy was published in 2016 with the aim of encouraging a greater level of cycling for work and leisure throughout the former Waveney district. The document assessed the quality of cycle routes within the district, identified 162 potential improvements and provided guidance on cycle provision design for use in the assessment of planning applications. Currently the East Suffolk Cycling and Walking Strategy is being prepared and a consultation on a draft version began in November 2021. This new strategy will cover the whole of the East Suffolk area and will include a monitoring framework.

## Transport Summary

Applications are generally complying with Suffolk County Council parking standards which is reflective of the effectiveness of Local Plan policies. Work is progressing to develop an East Suffolk Cycling and Walking Strategy to improve both walking and cycling provision across the whole District.

## Next steps

 Continue with the preparation of the East Suffolk Cycling and Walking Strategy (adoption expected Spring 2022 following consultation in November 2021)

# **Community Facilities and Assets**

- 7.99 Ensuring the provision of community facilities and assets across the District is essential to the creation of sustainable communities. Central to the Council's Business Plan is the priority of "Enabling Communities" and through Local Plan policies which seek to deliver, develop, protect and enhance facilities, the Council can ensure that all members of the community can make use of these facilities.
- 7.100 Through the Community Right to Bid, local groups have the right to nominate land or property to be listed as an Asset of Community Value (ACV) if certain principles are met. Listing (for a maximum of 5 years) allows the community group time to express an interest in buying the asset when it comes up for sale and prepare and submit a bid for the asset. During this monitoring year eight new assets have been listed, including public houses, meeting places, health centre, sports facilities and woodland/open space. Additionally, open space in Blaxhall originally listed in 2016 and due to expire February 2021 has been re-listed. No nominations for listing were unsuccessful this year.
- 7.101 An outline application was refused this year for the redevelopment of Southwold police station ACV for housing and refused in part as being contrary to Policy WLP8.22, which seeks the protection of existing community facilities and services in such uses. The <a href="East Suffolk Community Asset List">East Suffolk Community Asset List</a> provides a comprehensive list of all listed assets and further information is available at <a href="www.eastsuffolk.gov.uk/community/community-rights/community-right-to-bid/how-the-right-to-bid-works/">www.eastsuffolk.gov.uk/community/community-rights/community-right-to-bid/how-the-right-to-bid-works/</a>.

Indicator	Suffolk Coastal	Waveney	Link to further
			information
Applications permitting new / loss of	See table below		-
community services and facilities			
Applications permitting new / loss of	See table below		-
open space including allotments			

Applications permitting new / loss of community services and facilities.

Parish / Plan Ref	Gain or Loss	Description
Blythburgh	Loss	re-development of pay and play golf course for the siting
DC/20/3142/FUL		of 170 holiday lodges, new facilities buildings etc
Bromeswell	Loss/Gain	change of use of church and curtilage to provide facilities
DC/21/1622/FUL		for rugby club and business office
Felixstowe	Loss	change of use of former police station to dwellings
DC/20/1200/FUL		
Leiston	Loss/Gain	change of use of dental surgery to specialist school setting
DC/20/5262/FUL		

Parish / Plan Ref	Gain or Loss	Description
Leiston DC/19/2040/FUL	Loss	change of use of bowling green/club house to 15 dwellings
Martlesham DC/20/0115/PN3	Gain	provision of antenatal care to fitness and baby classes
Melton DC/20/4544/FUL	Loss/Gain	change of use of chapel to podiatry clinic
Pettistree DC/20/0755/FUL	Loss/Gain	change of use of public house and letting rooms to dance/yoga studio and holiday accommodation
Rendlesham DC/20/1035/FUL	Loss/Gain	redevelopment of site of demolished sports centre site to new convenience store, two shop units and 11 affordable homes
Barnby DC/20/2702/FUL	Loss/Gain	change of use from Methodist church to residential unit with commercial space as an art gallery
Carlton Colville DC/18/3428/FUL	Gain	Provision of childcare day nursery
Holton DC/20/1570/FUL	Gain	construction of building to provide holistic therapy treatments
Kessingland DC/20/2536/COU	Loss	change of use of public house to residential dwelling
Lowestoft DC/20/1306/FUL	Loss	conversion of public house to 4 dwellings
Oulton Broad DC/20/1059/FUL	Gain	change of use of offices to dental surgery

Indicator excludes A1 retail shops within designated shopping area i.e. town centres, district shopping centres, local shopping centres.

Applications permitting new / loss of open space including allotments.

Parish / Plan Ref	Gain, Loss or Enhancement	Description
Darsham DC/19/1462/FUL	Gain	erection of 26 dwellings, associated access, car parking and open space
Felixstowe DC/20/1002/ARM	Gain	residential development of 255 dwellings and public open space
Felixstowe DC/20/3067/FUL	Enhancement	positioning of cabins to provide refreshment kiosk, toilet facilities and storage
Trimley St. Martin DC/20/2890/ARM	Gain	construction of 70 dwellings, public open space and associated infrastructure (outline DC/16/2119/OUT)
Bungay DC/18/4429/ARM	Gain	construction 150 new dwellings, associated infrastructure and open space (outline DC/14/4193/OUT)

Parish / Plan Ref	Gain, Loss or Enhancement	Description
Lowestoft DC/20/5068/FUL	Enhancement	provision of a multi-use games area (MUGA) on school playing field
Lowestoft DC/19/3289/OUT	Gain	construction of up to 21 dwellings with associated landscaping, open space and ancillary infrastructure and works (outline application)
Reydon DC/20/2191/FUL	Enhancement	two replacement school sports pitches which will be available for community use (secured by S106)  NB existing sports pitches have outline consent for residential development

#### Suffolk Coastal Local Plan

7.102 One application provides a new facility for antenatal and postnatal services, and two applications result in the loss of a police station (Felixstowe) and bowling green/clubhouse (Leiston) to eight and fifteen dwellings respectively. Five applications result in the loss of one type of community facility to another and a further fifteen applications have been permitted which provide enhancements to existing community facilities, via extensions/alterations/replacement, such as village/community halls, sports clubhouses and public conveniences.

### Waveney Local Plan

- 7.103 Three applications provide for new community facilities, a childcare day nursery in Carlton Colville, dental surgery in Oulton Broad and holistic therapy in Holton. Two applications result in the change of use of vacant public houses in Lowestoft and Kessingland to a total of five residential dwellings. A further three applications have been permitted which provide enhancements to existing community facilities.
- 7.104 The Ness (WLP2.5 East of England Park) opened in November 2020. Formerly a vacant and underused site, it was regenerated with £1m from the Coastal Community Fund. There are ambitions to develop the area further to celebrate the cardinal point (Ness Point) and make it a tourist destination.
- 7.105 Overall, it appears that the policies covering community facilities and open space in the former Waveney area are working well. There has been an overall gain in open space as well as a number of enhancements. Whilst some community facilities have been lost, there has also been a number of gains. The Waveney Local Plan will continue to protect community facilities and open space through policies WLP8.22 Built Community Services and Facilities and WLP8.23 Protection of Open Space. The recently adopted Suffolk Coastal Local Plan will continue to protect community facilities and open space through policies SCLP8.1 Community Facilities and Assets and SCLP8.2 Open Space.

# **Community Facilities and Assets Summary**

The Council consider that the policies which provide for the continued provision of community facilities and assets across the District are performing well. These policies are fundamental to successful and healthy communities and give areas an identity. The policies do not distinguish between urban and rural communities, but the Council is aware that facilities in rural parts of the District are likely to come under greater pressure over the plan period – due in part to the smaller populations found in rural areas. In urban areas, the demand for community facilities can be greater due to a more concentrated population.

- Continue to work with Active Communities Team to maintain and enhance community facilities across the District, particularly in rural areas.
- Encourage communities to identify Assets of Community Value in their areas.
- Continue to support communities through the preparation of Neighbourhood Plans.

# Climate Change

- 7.106 This section provides information on the implementation of sustainable construction standards, renewable energy permissions, and assessments of applications at risk of coastal erosion and flood risk.
- 7.107 The Council is preparing a <u>Sustainable Construction Supplementary Planning Document</u> which will provide high-level practical guidance on sustainable construction methods and technologies, and the implementation of the sustainable construction and renewable and low carbon energy polices of the Local Plans. The SPD will include standard conditions to be attached to planning consents (Appendix C) and a sustainable development checklist (Appendix D) to ensure development proposals are compliant with relevant policy and acceptable in planning terms. Following the incorporation of feedback on the initial consultation held between March and April 2021, the draft Sustainable Construction Sustainable Construction SPD went out to consultation between 1st November 2021 and 13th December 2021. Following final post-consultation amendments, the document is expected to be adopted in Spring 2022.
- 7.108 An updated <u>planning application validation checklist</u> for East Suffolk was published in October 2020 to help ensure that Sustainability Statements (in the Waveney Local Plan area) or other required documentation (BREEAM post-construction certificate, Energy Statement and Water Statement, as relevant) submitted demonstrates how sustainability matters related to the development have been addressed by the applicant.
- 7.109 The Environmental Guidance Note provides information on best practices for developers seeking to mitigate the impact of the building industry on climate change. The Guidance Note was presented to Full Council in November 2020 for endorsement and has since been published on the Council's website.
- 7.110 The Council, as a Risk Management Authority, is responsible for addressing coastal erosion and coastal flooding across the district. Land affected by physical change to the shoreline through coastal erosion, coastal landslip or permanent inundation is defined in the National Planning Policy Framework as a Coastal Change Management Area. The Coastal Change Management Area is identified on the Policies Maps of the Suffolk Coastal Local Plan and the Waveney Local Plan.

Indicator	Suffolk Coastal	Waveney	Link to further information
All non-residential development	No relevant schemes have		-
(Suffolk Coastal) or all new office	completed this monitoring year		
and school development			
(Waveney) of 1,000m <sup>2</sup> or more			
gross floorspace achieving			
BREEAM 'Very Good' standard or			

www.eastsuffolk.gov.uk/planningpolicy

Indicator	Suffolk Coastal Waveney		Link to further
			information
equivalent (submission of BREEAM			
post construction certificate)			
Sustainability Statement to be submitted with applications for 10 or more homes	N/A	See assessment below	-
Number and proportion of residential developments of 10 or more homes achieving a reduction of 20% in CO <sub>2</sub> emissions below the Target Emission Rate (submission of Energy Statement)	See assessment below	N/A	-
Number of renewable energy schemes permitted [commercial]	2 relevant planning applications determined	No relevant planning applications determined	-
Number and type of permissions granted within the Coastal Change Management Area	4 applications for residential and tourism uses – see assessment below	11 applications for tourism, community and householder uses – see assessment below	-
Number of replacement homes permitted under coastal relocation / replacement policy	No relevant planning applications determined	No relevant planning applications determined	-
Applications permitted in flood zones – planning applications approved against Environment Agency advice on the basis of flood risk Carbon dioxide emissions – Total	0  East Suffolk Figure:	0 1,082kt	GOV.UK Environment Agency objections to planning applications UK local authority
for all sectors (2019)			and regional carbon dioxide emissions national statistics: 2005 to 2019

<u>BREEAM:</u> The Suffolk Coastal Local Plan requirement is for all non-residential development of 1,000m<sup>2</sup> or more floorspace and the Waveney Local Plan requirement is for offices and schools of 1,000m<sup>2</sup> or more floorspace.

Indicator	Suffolk Coastal	Waveney	Link to further
			information

<u>Carbon dioxide emissions:</u> This indicator measures total greenhouse gas in kilotonnes of CO<sub>2</sub> equivalent. Total greenhouse gas emissions are composed of CO<sub>2</sub> totals excluding short-cycle biomass burning (such as agricultural waste burning) but including other biomass burning (such as forest fires, post-burn decay, peat fires and decay of drained peatlands), all anthropogenic CH<sub>4</sub> sources, N<sub>2</sub>O sources and fluorine based-gases (HFCs, PFCs and SF6). (Source: landportal.org / N.A.E.I)

### Suffolk Coastal Local Plan

- 7.111 Policy SCLP9.2 Sustainable Construction requires new developments of more than 10 dwellings to achieve energy efficiency standards that result in a 20% reduction in CO<sub>2</sub> emissions below the Target CO<sub>2</sub> Emission Rate (TER) set out in current Building Regulations.
- 7.112 Few planning applications for the development of 10 or more dwelling have been determined in the former Suffolk Coastal areas since the adoption of the Suffolk Coastal Local Plan on 23<sup>rd</sup> September 2020. The policy has not been applied retrospectively to applications for reserved matters where outline planning approval was granted prior to the adoption of the Suffolk Coastal Local Plan. The policy has also not been applied where there was an earlier resolution to approve but the decision notice was delayed by other matters. It is too early to determine the effectiveness of policy SCLP9.2 due to the lack of relevant planning decisions issued.
- 7.113 The Environment Agency originally objected to two applications on flood risk grounds during 2020/21. An application for the change of use of a log cabin to a holiday let was refused as the applicant failed to submit a flood risk assessment and the proposal was considered contrary to policy and the National Planning Policy Framework. The other application was prior approval for an agricultural operation, and it was determined that prior approval was required.
- 7.114 Two applications for renewable energy schemes have been approved this year. One application is for the provision of air source heat pumps to provide heating and hot water to serve The Art Station, Saxmundham. The other application is for a solar photovoltaic array on land within the boundaries of MoD Woodbridge (Rock Barracks), the electricity generated will be supplied directly to the barracks and excess to the national grid. Supporting information states that it is anticipated ..."the development will generate 1.5MW of electricity annually. This generation will amount to a total first year carbon saving of 463.25 tonnes/CO2e. The on-site first year carbon saving would be 329.43 tonnes/CO2e. This equates with 29% reduction over the existing carbon emissions on site from electricity consumption."
- 7.115 Four planning applications have been permitted within the Coastal Change Management Area (Policy SCLP9.3) this monitoring year. Three applications are for minor development related to existing tourism accommodation and residential uses and one for retrospective Listed Building

consent for the demolition of Orford Lighthouse required for public safety as coastal erosion had undermined the stability of the building.

#### Waveney Local Plan

- 7.116 Policy WLP8.28 requires the submission of a Sustainability Statement for new major development to demonstrate how the development can reduce its impact on the environment. Four full/approval of reserved matters applications have been permitted this monitoring year. A variety of energy statements/documentation has been submitted as supporting documentation. For one application it was deemed that as the policy was not in place at the time outline consent was granted it was not considered reasonable to impose a condition requiring submission of a sustainable construction statement (150 dwellings, Bungay) at the reserved matter stage. The recently updated planning application validation checklist and the publication of the Sustainable Construction SPD will help ensure that appropriate Sustainability Statements demonstrate how sustainability of the development has been considered by the applicant.
- 7.117 The Environment Agency objected to one application due to the lack of a flood risk assessment, however additional information and a minor change to the application confirmed the development to be water compatible and the Environment Agency withdrew their objection.
- 7.118 Eleven planning applications have been permitted within the Coastal Change Management Area (Policy WLP8.25) this monitoring year. These applications are for minor development related to existing or new tourism accommodation or destination attraction, commercial and residential uses.
- 7.119 Lowestoft has significant areas within Flood Zone 3. Construction of a new pumping station and flood wall to reduce the risk of future surface water flooding to homes along Kirkley Stream in Lowestoft has progressed this monitoring year and completed during the Summer. Progress has also been made on the construction of tidal flood walls and barrier around the Outer Harbour with ground investigation works for the tidal flood walls undertaken in May 2020. The construction of the tidal walls will complete summer 2022 prior to works starting on the tidal barrier. When complete (expected to be in 2025), the project will significantly reduce the risk of tidal flooding to areas adjacent to Lake Lothing, including the Kirkley Waterfront and Sustainable Urban Neighbourhood (WLP2.4).

# Climate Change Summary

In light of the Climate Emergency, both nationally and locally, the Council is taking proactive steps to address the planning-related implications.

The Council continues to address climate change through proactive policies in the Local Plans which promote sustainable construction techniques and the use of renewable technologies across the district. The impacts of climate change are continuing to be seen through the impact of coastal erosion and flooding in areas at risk (as well as other areas, such as biodiversity impacts). East Suffolk Council is at the forefront of the renewable energy sector and works in partnership with energy companies and providers to deliver schemes and projects that address the implications of climate change.

No applications were approved against Environment Agency advice on flood risk.

- Preparation of East Suffolk Sustainable Construction Supplementary Planning Document (adoption Spring 2022)
- Develop a Coastal Adaptation Supplementary Planning Document (a joint document with North Norfolk District Council, Great Yarmouth Borough Council, the Broads Authority, and Coastal Partnership East covering the coastline from Holkham in Norfolk to Felixstowe in Suffolk) (adoption expected during 2022)
- Develop processes to ensure climate change indicators can be effectively monitored

# Design

- 7.120 Good design is concerned not only with how development looks but also how it feels and functions.

  The built environment should cater for people throughout their lifetime and be suitable and accessible for people regardless of age, mobility or disability.
- 7.121 High quality design and building conservation in East Suffolk is recognised through the Council's annual Quality of Place Awards. Details can be found at <a href="https://www.eastsuffolk.gov.uk/planning/design-and-conservation/quality-of-place-awards/">www.eastsuffolk.gov.uk/planning/design-and-conservation/quality-of-place-awards/</a>.
- 7.122 Part M of the Building Regulations 2010 establishes the standards that must be achieved regarding the access to and use of buildings. Part M4(2) covers the requirement for new dwellings to provide reasonable provision for most people to access the dwelling, including features which make it suitable for a range of potential occupants.
- 7.123 Building for Life 12 was a design tool used to assess the design quality of new major residential developments for supporting the health and wellbeing of new communities through the creation of attractive, safe and well-functioning places to live. Building for Life 12 was updated and superseded by Building for a Healthy Life guidelines in June 2020, after the Waveney Local Plan had been adopted and the Suffolk Coastal Local Plan was in a late stage of development. Both Local Plans still therefore refer to Building for Life 12 in their respective key design policies, Policy WLP8.29 Design and Policy SCLP11.1 Design Quality, rather than Building for a Healthy Life. The Building for a Healthy Life guidance is intended to be used primarily as a design process structure, rather than a scoring system. Building for Life uses a traffic light system to highlight good and bad practice that is similar to the system used in Building for Life 12. A proposed development is assessed against various criteria that is both listed and illustrated in Building for a Healthy life. Outcomes of the assessment are either positive (green) that indicated 'go ahead', mixed results (amber) that should be avoid where possible or negative (red) outcomes that required 'a stop and rethink' of the proposal. Proposed developments are assessed against criteria set out for each topic, for example, within the consideration of 'Walking, cycling and public transport', one assessment criterion is to integrate into the design '20mph design speeds, designations and traffic calming'. Both Local Plans state that major residential development proposals will be supported where they perform positively when assessed against Building [for a Healthy Life] guidelines. The guidelines can be found at https://www.udg.org.uk/publications/othermanuals/building-healthy-life.
- 7.124 During 2020/21, 62 planning applications for new dwellings were refused, at least in part, on design grounds. A common reason cited for refusal was due to the proposal being a cramped form of development, of poor or not of high quality design and out of character or harmful to the character of the area and or neighbouring properties.

Indicator	Suffolk Coastal	Waveney	Link to further information
Major residential developments performing positively against Building for a Healthy Life guidelines	See assessment below	See assessment below	-
Sites with a capacity of 10 or more dwellings to make provision for accessible and adaptable dwellings under Part M4(2) of the Building Regulations	Four applications permitted: one application meets the requirement, and one application provides majority requirement	Four applications permitted: none specifically meet the policy requirement	-

<u>M4(2)</u> standard: the Suffolk Coastal Local Plan policy SCLP5.8 requires 50% of all dwellings to meet the standard under Part M4(2) of the Building Regulations, and the Waveney Local Plan policy WLP8.31 requires 40% of all dwellings to meet the standard.

## Suffolk Coastal Local Plan

- 7.125 Policy SCLP11.1 Design Quality aims to ensure development proposals demonstrate an understanding of local character, with particular regard to the key features of local character, and that such features are enhanced through locally distinctive and innovative design. As discussed above, embedded in the policy is a requirement for Building for a Healthy Life to be used to assess the design quality of new major residential developments proposals, which are expected to perform positively when assessed against the guidelines. Four relevant schemes have been approved since the adoption of the Local Plan and deemed compliant with the design policy. It is expected that future proposals will be assessed against Building for a Healthy Life guidelines as part of the assessment of the application.
- 7.126 Policy SCLP5.8 Housing Mix requires developments of 10 or more dwellings to provide at least 50% of dwellings, and all specialist dwellings, to meet the requirements of Part M4(2) of the Building Regulations. This monitoring year, four applications have been approved since the adoption of the policy of which one application for 70 dwellings provides 50% (35 dwellings) to M4(2) standards of which 10 are affordable homes. A scheme for 255 dwellings provides 42% to M4(2) standards, although not quite meeting the 50% requirement the outline consent was approved prior to the adoption of the policy. Two further applications both for eleven dwellings were approved subject to S106 prior to the adoption of the Local Plan and, due to delays in agreeing the S106, were represented to Planning Committee in October 2020 for consideration against the newly adopted Local Plan however without full compliance with some of the required details.
- 7.127 11% of homes completed this monitoring year are bungalows (60 no.) of which two are affordable homes (affordable rent). Although not necessarily built to accessible/adaptable standards, these

completed bungalows could provide occupants with a home that may meet future requirements more readily than a home over more than one floor.

#### Waveney Local Plan

- 7.128 Policy WLP8.29 Design expects new development to demonstrate high quality design and provides a framework of principles and considerations for well-designed places that respond to local context, and that make the best use of developable land. These considerations are to be applied to the design of all new development. Furthermore, the policy states that all major residential developments will be supported where they perform positively against Building for a Healthy Life. This monitoring year, four relevant schemes have been approved and deemed compliant with the design policy. It is expected that future proposals will be assessed against Building for a Healthy Life guidelines as part of the assessment of the application.
- 7.129 Policy WLP8.31 Lifetime Design requires developments of 10 or more dwellings to provide 40% of dwellings to the requirements of Part M4(2) of the Building Regulations. This monitoring year, four applications have been permitted and should have provided such. One scheme for retirement apartments (at least one occupant aged 55 or over) will be 'care-ready'. In determining a scheme for 150 dwellings in Bungay it was judged unreasonable to impose the requirement as the policy was not in place at the time outline planning permission was granted. An affordable housing scheme for 31 flats provides one ground floor flat to M4(2) standards and with a wheelchair accessible lift, a total of nine flats are accessible to wheelchair users. The final scheme for the change of use of an existing building into 15 flats provides four flats on the ground floor however no there is no lift provision.
- 7.130 12% of homes completed this monitoring year are bungalows (33 no.) of which four are affordable homes (affordable rent). Although not necessarily built to accessible/adaptable standards, these completed bungalows could provide occupants with a home that may meet future requirements more readily than a home over more than one floor.

## **Design Summary**

Achieving well-designed development is fundamental to the creation of excellent quality places that support high levels of health and wellbeing in the communities that live, work and play there so that they may thrive. High quality design district-wide will support East Suffolk to continue to be an attractive, healthy and well-functioning place to live that meets the needs of people of all ages, abilities and ways of life, and continues to attract investment.

Delivering such development requires an understanding of the principles of good design according to the intended users and purpose of the development' as such the Building for a Healthy Life guidelines are recommended for residential development, and other uses or mixed use (but non-residential) development proposals should have regard to the relevant sections of the National

Planning Policy Framework, National Design Guide and other relevant guidance documents.

The Council is also in the process of preparing an East Suffolk Sustainable Construction SPD (adoption expected Spring 2022), Affordable Housing SPD (adoption expected Spring 2022), and a Healthy Environments SPD (adoption expected 2023), all of which will include design guidance relevant to the topic area.

The Council is also preparing a Cycling and Walking Strategy (adoption expected Spring 2022), which is essentially a list of high priority active travel infrastructure schemes for the district. The Strategy has a direct relationship with development in the district as this is likely to be its main means of delivery; once adopted, development will be expected to support the delivery of the Strategy, where relevant and proportionate to the proposal.

Through the application of the Building for a Healthy Life guidelines – in concert with the other provisions of both SCLP11.1, WLP8.29 and other key design policies in the Local Plans – the Council will be able to monitor design quality across the district which will help identify both opportunities and constraints to achieving high quality homes, work places and wider public realm.

- Implementation of design policies to ensure delivery of development of high design quality including supporting people's health, wellbeing and ways of life throughout their lifetime
- Prepare Residential Development Briefs for site allocations in both Local Plans where deemed useful for aiding delivery
- Continue preparation of the East Suffolk Sustainable Construction Supplementary Planning Document (adoption expected Spring 2022)
- Continue preparation of the East Suffolk Cycling and Walking Strategy (adoption expected Spring 2022)
- Continue preparation of the East Suffolk Healthy Environments Supplementary Planning Document (adoption expected 2023)

# **Natural Environment**

- 7.131 East Suffolk has a high quality natural environment which is enjoyed by residents, visitors, and wildlife. There are a range of locally, nationally and internationally designated sites of landscape and biodiversity importance, including the Suffolk Coast & Heaths AONB, RSPB Minsmere, and the Norfolk and Suffolk Broads.
- 7.132 A particular issue is the need to ensure that new development, through increased recreational pressure, does not result in harm to the integrity of Special Protection Areas, Special Areas of Conservation and Ramsar sites. Many of the European designated sites cross administrative boundaries, therefore a collaborative approach is required to ensure that mitigation measures are delivered across the wider area in a consistent manner.
- 7.133 The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) has been developed with East Suffolk Council, Ipswich Borough Council, Babergh District Council and Mid Suffolk District Council. The RAMS document identifies a 13km 'Zone of Influence' (ZOI) around the designated sites and requires new residential development within that zone to make a financial contribution towards a suite of measures to mitigate the impacts of increased recreational pressure. The relevant sites within East Suffolk are:
  - Alde Ore Estuary Special Protection Area (SPA) and Ramsar site
  - Benacre to Easton Bavents SPA and Benacre to Easton Bavents Lagoons Special Area of Conservation (SAC)
  - Deben Estuary SPA and Ramsar site
  - Minsmere to Walberswick Heaths and Marshes SAC
  - Minsmere Walberswick SPA
  - Orfordness Shingle Street SAC
  - Sandlings SPA
  - Stour and Orwell Estuaries SPA and Ramsar site
- 7.134 East Suffolk Council have worked in partnership with Ipswich Borough Council to prepare RAMS Supplementary Planning Document (SPD). This SPD will support the delivery of the RAMS project, it includes the per-dwelling tariff and provides further guidance for applicants within the RAMS Zone of Influence, including detail around which kinds of development need to pay the tariff and the options for making that payment. The SPD was adopted by Ipswich Borough Council in February 2020. Consultation on the Draft East Suffolk SPD took place from 19<sup>th</sup> October to 7<sup>th</sup> December 2020 and was adopted by East Suffolk Council on 4<sup>th</sup> May 2021.
- 7.135 The RAMS project includes separate arrangements for monitoring the collection and spend of the tariff and this will be reported through the RAMS Executive Board. Future Authority Monitoring Reports will summarise the overall collection and spend. Further information can be found at www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/.

7.136 Ten new County Wildlife Sites have been designated within the monitoring year, totalling 4.73 hectares. Eight of these sites were formerly designated as Roadside Nature Reserves located in Hacheston, Blyford (x2), Keslale cum Carlton, Marlesford, Melton, St Mary South Elmham (otherwise Homersfield) and Yoxford. The other two sites are in Farnham (Pond Wood) and Otley (Otley Gull). County Wildlife Site designation is non-statutory, but it recognises the high value of a site for wildlife. Further information can be found at Suffolk Biodiversity Information Service <a href="https://www.suffolkbis.org.uk">https://www.suffolkbis.org.uk</a>.

# **Natural Environment Summary**

East Suffolk contains a varied and valuable natural environment which is home to numerous protected species and habitats. Policies in the relevant Local Plans have ensured that landscapes have been protected by ensuring that any development that takes place only occurs when it is suitable.

The Council will continue to protect these valuable areas through the policies in the new Local Plans for the District. These policies also look to enhance these areas and the Council will take other measures for this to occur, including adopting the Recreational Disturbance Avoidance and Mitigation Strategy SPD (adopted May 2021).

The Environment Bill became law in November 2021 and the national requirement for Biodiversity Net Gain on development sites is likely to be introduced in 2023. Both Local Plans contain policies that ensure the protection of the natural environment and encourage net gains where possible. Once Biodiversity Net Gain becomes a requirement, the Council will take necessary measures to implement this requirement.

- Develop indicators to monitor the implementation of RAMS
- Implementation of Biodiversity Net Gain, where practicable and justifiable

## Historic Environment

- 7.137 A heritage asset is defined in the National Planning Policy Framework as "a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest". Heritage assets include those that are designated such as listed buildings, conservation areas and scheduled monuments, and those that are non-designated, which are those identified by the local planning authority or neighbourhood plans.
- 7.138 The significance of non-designated heritage assets is judged against the Council's published criteria. Significance is the value of a heritage asset to this and future generations because of its heritage interest that can be archaeological, architectural, artistic or historic.
- 7.139 Following public consultation, a number of changes to Woodbridge and Yoxford conservation areas have been approved this monitoring year. In addition, a supplement to the existing Woodbridge Conservation Area appraisal and new replacement Conservation Area appraisals for Holton, Homersfield, Wissett and Yoxford have been approved. Further information on Conservation Areas, listed buildings and non-designated heritage assets can be found at <a href="https://www.eastsuffolk.gov.uk/planning/design-and-conservation/">https://www.eastsuffolk.gov.uk/planning/design-and-conservation/</a>.
- 7.140 Public consultation on the draft East Suffolk Historic Environment Supplementary Planning Document (SPD) was held between December 2020 and February 2021. Following consideration of the responses received, the final SPD was adopted by Cabinet on 1 June 2021. The document provides guidance on the implementation of planning policies related to the Historic Environment. The document and supporting documents are available at <a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/</a>
- 7.141 During 2020/21, Historic England have added fifteen entries to the National Heritage List for England, comprising 11 First World War memorials, a former Post Office and Store and a pair of estate workers cottages in Somerleyton, a farmhouse in Flixton (East) and a terrace of almshouses in Bungay. These entries are all Grade II and further information can be found at <a href="https://historicengland.org.uk/listing/the-list/">https://historicengland.org.uk/listing/the-list/</a>
- 7.142 Orfordness Lighthouse (Grade II) was Listed in June 2008 as example of an early masonry lighthouse and one of the earliest lights to be fuelled by oil with much of the original interior detailing surviving intact. However, during July 2020 work commenced to remove the structure for public safety as ongoing coastal erosion had undermined the stability of the building. A number of key original features were removed prior to demolition.

Indicator	Suffolk Coastal	Waveney	Link to further information
Number of Conservation	0	1 (Lowestoft	<u>Historic England Heritage</u>
Areas at risk (2020)		North)	at Risk Register 2021
Number of Listed Buildings and other Heritage Assets on the 'at risk' register	18	9	Historic England Heritage at Risk Register 2021
Number of Historic Parks and Gardens	6-7	3	Historic England Registered Parks & Gardens

#### Suffolk Coastal Local Plan

- 7.143 Historic England's Heritage at Risk Register 2021 includes two new entries within the former Suffolk Coastal area Church of St John the Baptist Church, Badingham, and Church of St Peter, Sibton.
- 7.144 Suffolk Coastal Local Plan policies SCLP11.3 to SCLP11.8 seek to ensure the historic environment is preserved and enhanced, and that development makes a positive contribution to the historic environment where at all possible.

#### Waveney Local Plan

- 7.145 North Lowestoft Conservation Area was added to Historic England's Heritage at Risk Register because poor quality alterations to individual buildings have harmed the character of the historic High Street. In December 2017 the area was designated as a Heritage Action Zone (HAZ) and a five-year programme began in May 2018 to regenerate the area. The aim is to bring vacant and 'at risk' buildings back into use, encourage footfall, support cultural events and research and engage the community about the historic significance of the area. As part of this programme of works the North Lowestoft Heritage Action Zone Design Guide was prepared and adopted in July 2020. It can be viewed via the following link: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Lowestoft-HAZ/North-Lowestoft-Heritage-Action-Zone-Design-Guide-SPD.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Lowestoft-HAZ/North-Lowestoft-Heritage-Action-Zone-Design-Guide-SPD.pdf</a>
- 7.146 In September 2019 Historic England also designated south Lowestoft as a High Street Heritage
  Action Zone. Comprising the majority of the South Lowestoft Conservation Area, a Conservation
  Area Appraisal and Management Plan has been commissioned and development of a Masterplan for
  South Lowestoft and the Seafront is progressing.
- 7.147 Waveney Local Plan policies WLP8.37 to WLP8.40 seek to ensure the historic environment is preserved and enhanced, and that development makes a positive contribution to the historic environment where at all possible.

# **Historic Environment Summary**

East Suffolk District has a rich historic environment, a wide variety of historic buildings and other heritage assets, such as parks and monuments. North Lowestoft Conservation Area remains listed on the Heritage at Risk Register, however, the North Lowestoft Heritage Action Zone seeks to increase understanding of the conservation area, rejuvenate historic buildings and spaces and act as a catalyst for wider economic regeneration. Work is also ongoing to identify heritage assets that are at risk and ensure their restoration and protection.

- Adoption of East Suffolk <u>Historic Environment Supplementary Planning Document</u> (June 2021)
- Work will be undertaken to further develop a standardised monitoring process in relation to non-designated heritage assets across the district
- Early work on the recently designated South Lowestoft Heritage Action Zone

# Health

- 7.148 Supporting the health and wellbeing of the district's population is a key theme running throughout the Suffolk Coastal and Waveney Local Plans. East Suffolk has challenges relating to an ageing population 27% of the district's population are State Pension age or older, which is higher than the East of England average of 19%, and the UK average of 18%. Other key challenges include adult and child obesity, a high proportion of the population with a limiting long-term illness or disability, inactivity, loneliness and social isolation, and pockets of deprivation the health impacts of which are particularly observable in the respect of life expectancy differences of up to 10 years between different wards of the district.
- 7.149 The Sustainability Appraisals for the Suffolk Coastal and Waveney Local Plans identified high-level objectives for addressing identified health and wellbeing issues through Local Plan policy, and recommended indicators to monitor progress against these objectives. The AMR's health section has been expanded to monitor more data sets relevant to health and wellbeing in the district as more annual data sets of relevance have since been identified. The full list of objectives and indicators in the Sustainability Appraisal can be found in Appendix 3, and the additional indicators being monitored can be found in this section's table of indicators (below).
- 7.150 The Council is currently in the early stages of producing an East Suffolk Healthy Environments Supplementary Planning Document. This document is intended to provide guidance on the appropriate design of developments and supporting infrastructure for socially sustainable and inclusive built environments. This is intended to help improve health and wellbeing in the district.
- 7.151 As mentioned elsewhere in this AMR, the Council is also preparing an East Suffolk Cycling and Walking Strategy, which will identify opportunities in the District where cycling and walking infrastructure improvements of strategic importance for growth and modal shift (and therefore anticipated high benefit to cost ratios for people and planet) are considered to be deliverable. Cycling and walking, whether for sport, leisure or as a practical means of transport can be highly beneficial for health and wellbeing providing the route is well designed and maintained to be safe to use. Improving sustainable transport infrastructure (public transport, cycling and walking) was identified in both Local Plans under their respective strategic priorities for supporting healthy, safe, cohesive and active communities. The Strategy is currently (autumn 2021) undergoing consultation and is expected to be adopted by the Council in 2022.
- 7.152 There are many aspects of the built environment, public realm and its supporting infrastructure that have the potential to influence health which can be monitored, such as whether a population has adequate access to high-quality green space, or whether safe and accessible routes for cycling and walking to work/school/retail are available. As the AMR is structured by theme, and health is impacted by many factors relevant to planning, indicators that have a relationship with health have been reported on throughout this document by topic area. Examples of some of the indicators that

can be found throughout the AMR which have a potential relationship with health and wellbeing levels in the district are:

- The amount and mix of employment land in business use (employment opportunities);
- the amount and mix (or not) of retail and leisure use floorspace (employment opportunities and access to convenience goods, services and comparison retail);
- the number of homes built to adaptable and accessible dwellings standards (see Part M4(2) of the Building Regulations);
- loss, enhancement or gain of existing or new community facilities, allotment sites or open space;
- implementation of the East Suffolk Cycling and Walking Strategy, once adopted, to safer and more accessible cycling and walking routes.
- 7.153 The Suffolk Coastal Local Plan Sustainability Appraisal also includes two air quality indicators, which are monitored and recorded in the table below.
- 7.154 The following indicators are common to and key to the achievement of health and wellbeing objectives identified in both Local Plans. Three wellbeing indicators (anxiety, happiness and life satisfaction) were added last year, and this year the percentages of the district's population living in the 20% most and least deprived areas of England has been added to ensure a more complete picture of the different aspects of population health and wellbeing are being monitored.

Indicator	Suffolk Coastal	Waveney	East Suffolk	Link to further information
Life expectancy at birth (age <1) (2018-2020)	N/A	N/A	80.4 Males 83.8 Females	ONS, Life expectancy estimates, all ages,
Percentage of the population living in the 20% most deprived areas of England			12%	UK English Indices of Deprivation, 2019
Percentage of the population living in the 20% least deprived areas of England			23%	
Participation in physical activity – adults 16+ active an average of 150+ minutes a week (Nov 2019 – Nov 2020)	N/A	N/A	65%	Sport England Active Adult Lives Survey
Percentage of adults 18+	N/A	N/A	63.5%	<u>Public Health</u>

Indicator	Suffolk Coastal	Waveney	East Suffolk	Link to further information
classified as overweight or obese (2019-20)				England, Public Health Profiles
Prevalence of overweight including obesity among children in Year 6 (age 10-11 years) (2019-20)			29.4%	Public Health England: Obesity Profile
Anxiety ("On a scale where 0 is "not at all anxious" and 10 is "completely anxious", overall, how anxious did you feel yesterday?") (Mean) (April 2020-March 2021)	N/A	N/A	3.15	ONS, Personal well- being estimates by local authority (Annual Population Survey)
Happiness ("Overall, how happy did you feel yesterday?") (Mean) (April 2020-March 2021)	N/A	N/A	7.51	
Life Satisfaction ("Overall, how satisfied are you with your life nowadays?") (Mean) (April 2020-March 2021)	N/A	N/A	7.66	
Number of designated Air Quality Management Areas (AQMAs) (2020)	2 (Long Row, Stratford St Andrew and Thoroughfare, Woodbridge)	0	2	East Suffolk Air Quality Reports
Number of locations at or above any of the national Air Quality Objectives for England (2020)	0	0	0	
Number of nitrogen dioxide (NO <sub>2</sub> ) monitoring sites within 10% of the annual mean Air Quality Objective (sites at or above 40μg/m³) (2020)	1 (STA 8 within the declared AQMA at Stratford St Andrew: 36.2µg/m³)	0	0	

- 7.155 Life expectancy estimates show that, in East Suffolk, people under the age of one year between 2018-2020 can expect to live to 83.8 years of age if they are female, or 80.4 years of age if they are male. These figures are higher than the averages for England at 83.1 years for females and 79.4 years for males. Life expectancy between the different wards of the district can vary significantly. Healthy life expectancy (years of your life you can expect to be in good health) is a more useful indicator, however, data is not available at local authority or ward level.
- 7.156 The Sport England Active Adult Lives Survey findings from the period of November 2019 to November 2020 (which included the first eight months of both the COVID-19 restrictions and this annual monitoring cycle) showed the percentage of adults reporting to be active (undertaking at least 150 minutes of at least moderate intensity exercise per week) reached its highest level since the inception of the survey in 2015, peaking at 65% between the November 2019-20 period significantly up from 60.7% between November 2018-19; this is also slightly higher than both the regional and national average for 'active'. There was a slight drop in the 'fairly active' (30-149 minutes of activity per week) category, from 12.5% in November 2018-19 to 10.9% in the November 2019-2020 period (which is slightly lower than both the regional and national level for 'fairly active'). There was also a decrease in those reporting themselves as 'inactive' (less than 30 minute a week) from 26.8% to 24.1% in the November 2019-2020 period (which is slightly lower than both the regional and national level for 'inactive'). This 4.3% movement out of the two less active categories and into the 'active' category suggests that some people became significantly more active during the main period of COVID-19 restrictions. Overall activity levels were therefore higher than the national and regional averages.
- 7.157 The percentage of East Suffolk adults (aged 18+) classified as overweight or obese between 2019/20 is 63.5%, which is slightly higher than the regional and national average of 62.3% and 62.8% respectively. The prevalence of overweight including obesity among children in Year 6 (age 10-11) increased from 28.8% in the September 2018-19 period to 29.4% in the 2019-20 period, though this is still below the East of England average (32.7%) and national average (35.2%).
- 7.158 The results for the period April 2020 to March 2021 for East Suffolk show an increase in anxiety with the average mean score rising to 3.15 from 2.76; the national and East of England scores also increased this year and are 3.05 and 3.04 respectively. Reported happiness decreased in all three geographies over the last year, with the East Suffolk score marginally better at 7.51 than national (7.31) and the East of England (7.37). Similarly, life satisfaction scores marginally decreased this year but at 7.66 the East Suffolk score is still higher than England (7.38) and the East of England (7.47). It is likely that the mental health impact of the restrictions imposed during the COVID-19 pandemic were significant contributing factors on the raising of anxiety and lowering of happiness and life satisfaction from the previous annual monitoring period.
- 7.159 Air quality in the district is generally good. The main source of emissions within the district is road traffic, which means that the pollutants of concern are nitrogen dioxide (NO<sub>2</sub>) and particulate matter; within the town of Felixstowe, emissions from and associated with the Port are also a source of these two pollutants.

- 7.160 There are two small, localised areas within the former Suffolk Coastal area where the objective set for annual mean nitrogen dioxide (NO<sub>2</sub>) has been exceeded in the past and Air Quality Management Areas (AQMAs) are currently declared:
  - Several houses on the road junction of Lime Kiln Quay Road, Thoroughfare and St. John's Street in Woodbridge (Woodbridge Junction)
  - Four residential properties within Long Row, Main Road (A12) in Stratford St Andrew.
- 7.161 The results from diffusion tube monitoring show that there are no sites across the district with annual mean concentrations at or above the objective level of  $40\mu g/m^3$ . NO<sub>2</sub> levels for the Woodbridge AQMA have reduced since 2014 and have now been below the objective level for seven years; the Council has started the assessment process for revoking this AQMA. Stratford St Andrew AQMA NO<sub>2</sub> concentrations have continued to fall below the objective. All monitoring locations, both at the continuous analyser in Woodbridge and across the diffusion tube network, showed a significant reduction in annual mean NO<sub>2</sub> concentrations in 2020 compared to 2019 (20% reduction on average), likely due to the impact of COVID-19 and associated travel restrictions.

## **Health Summary**

East Suffolk has a significantly older population than the national average, and therefore faces health and wellbeing challenges relevant to advanced age. Activity levels are lower than the national average, though this should be considered in the context of a relatively ageing population, and a population with a relatively high proportion of people managing limiting long-term illness or disability. Life expectancy in the district is similar to the national average, though there is significant disparity between some wards of the district.

Between the November 2018-19 and 2019-2020 period, the latter of which included the period of the COVID-19 pandemic with the most restrictive lockdown measures, a significant increase (4.3%) in activity in the district occurred, where those that had previously reported themselves as 'inactive' (undertaking less than 30 of at least moderate intensity activity per week) or 'fairly active' (undertaking between 30-149 minutes per week), shifted into 'active' (undertaking at least 150 minutes per week). Activity levels were higher than both the regional and national averages.

Adult overweight and obesity levels are slightly higher in East Suffolk than the national and regional average. Children of Year 6 age have lower than both national or regional average levels of overweight and obesity, but the overall level has increased during this monitoring period. Reported levels of happiness and life satisfaction decreased over the monitoring period, and anxiety increased; this was consistent with changes across the nation, likely as a response to the COVID-19 pandemic restrictions.

There is a continued positive trend in air quality remaining below the annual mean concentration

objective level for nitrogen dioxide of  $40\mu g/m^3$ , and the Air Quality Monitoring Area designation for the Thoroughfare, Woodbridge is under assessment for de-designation.

- Preparation of the East Suffolk Healthy Environments Supplementary Planning Document
- Preparation of the East Suffolk Cycling and Walking Strategy
- Preparation of the East Suffolk Sustainable Construction Supplementary Planning Document
- Implement Local Plan policies to continue to improve health outcomes for the district
- Review and improve the range of indicators being monitored

# **Nationally Significant Infrastructure Projects**

7.162 This section provides a summary of the nationally significant infrastructure projects within East Suffolk. It is worth highlighting the regular and ongoing engagement that ESC has had at a more strategic level with Government to highlight our concerns regarding the lack of co-ordination between the large number of nationally significant infrastructure projects proposed within our district and the potential adverse cumulative impacts which could result. The engagement efforts are set out on the <u>strategic engagement page</u> of the Council's website and are continuing.

#### Offshore wind

- 7.163 East Anglia One: The Council worked closely with the promotor and their contractors throughout the East Anglia One construction and continues to do so in the final stages of reinstatement in relation to the cable route. Monitoring primarily takes place through regular meetings between planning and technical staff of East Suffolk Council, Mid Suffolk Council, Suffolk County Council, and the ScottishPower Renewables project team. All 102 Siemens Gamesa offshore wind turbines, situated 43km off the Suffolk coast, are fully operational, with the capacity to produce 714MW of clean energy.
- 7.164 The East Anglia Hub Strategy will deliver the consented but not-yet-constructed East Anglia Three offshore windfarm and not yet consented East Anglia One North and East Anglia Two offshore wind farms. East Anglia Three construction is scheduled to commence in 2022. The Hub concept will enable the accelerated development of these projects and increase efficiencies. Together, if consented, the East Anglia Hub could generate 3.14 gigawatts of green electricity to the National Grid. The applications for East Anglia ONE North and for East Anglia TWO were submitted to the Planning Inspectorate in October 2019, with the Examinations closing on 6 July 2021. A decision by the Secretary of State is anticipated in January 2022. Two other windfarm proposals off the Stour and Orwell estuary Five Estuaries (formerly known as the Galloper Extension) and North Falls (formerly Greater Gabbard Extension) are in the early stages of scheme development.

### **Nuclear energy**

- 7.165 During 2019/20, the Sizewell C new nuclear power station (EDF Energy) proposal was accepted for examination in June 2020. The examination the biggest DCO application yet submitted in England lasted until 14<sup>th</sup> October 2021, with the panel of examiners having three further months to write its report and make its recommendations to the Secretary of State (i.e. 14<sup>th</sup> January 2022). The Secretary of State then has a further three months to make his decision.
- 7.166 Whilst long supportive in principle of the development, the Council has maintained a 'neutral' position in relation to the specific proposal due to a number of concerns not being fully addressed prior to or during the examination. The Council has continued to engage thoroughly on a large number of issues during the examination, including: potential coastal impacts arising from the proposed beach landing facility and the new hard coastal defence feature; the potential effects on

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the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and wider landscape; potential effects with regards to protected species in the area including the nearby Special Protection Areas and Special Areas of Conservation; the potential transport implications (particularly, but not exclusively, during construction); and the effects on local communities, and Leiston in particular.

7.167 The Council has continued to work closely with the promotor and others to ensure the social impacts of the proposal, particularly during construction, on local communities would be minimised and, where appropriate, mitigated. In addition, the potential economic development benefits of the project are being closely worked upon with the promotor, particularly on improvements to the skills and education offering in East Suffolk and boosting employment opportunities for the District resulting from the construction programme. The Council is continuing to work with other partners, including the Suffolk Chamber of Commerce and New Anglia LEP, to ensure that the district secures benefits from the supply chain through the construction and operational aspects of the project.

#### Interconnectors

7.168 There have been ongoing preliminary discussions with National Grid Ventures on their proposed multi-purpose interconnector projects — Nautilus and Eurolink. Nautilus is proposed to provide energy exchange between Belgium and the UK and Eurolink is proposed to provide energy exchange between the Netherlands and the UK. The Nautilus proposal progressed to a formal round of public pre-application consultation in autumn 2021. The Council anticipates that there may be some benefits for East Suffolk during the construction phase of the proposal through access to employment — provided there are the necessary skilled workers available. However, there are also likely to be dis-benefits with impacts on the environment, local communities and the highway network with additional construction vehicles on the rural roads network. Once operational, benefits will be limited as the end building will be a predominantly unmanned electricity converter and substation complex.

## **Gull Wing (Lake Lothing Third Crossing, Lowestoft)**

- 7.169 The third crossing over Lake Lothing will help alleviate traffic congestion in the town, improve connectivity and help deliver regeneration sites. The Development Consent Order was issued by the Secretary of State on 30<sup>th</sup> April 2020. Construction works commenced March 2021 and are progressing well, with the bridge is expected to open mid/late 2023. Further information can be found at <a href="https://gullwingbridge.co.uk">https://gullwingbridge.co.uk</a>
- 7.170 Further details can be found on the individual project websites and the Council's website <a href="https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/">https://www.eastsuffolk.gov.uk/planning/national-infrastructure-and-energy-projects/</a>.

### Delivery of infrastructure projects

- 7.171 This section provides information on the delivery of infrastructure projects highlighted in the adopted Local Plans and which are more local in scale than the Nationally Significant Infrastructure Projects referred to above. Not all infrastructure projects are necessary to support the growth identified in the adopted Local Plans but are identified as projects which could come forward during the lifetime of the plans.
- 7.172 The Council continuously engages with other authorities and infrastructure providers in relation to infrastructure projects, including strategic cross boundary infrastructure projects. Funding for infrastructure usually comes through s106 and/or CIL payments, but other sources of funding can be used to assist in infrastructure delivery and the Council regularly explores these in conjunction with partners. Projects funded through the Community Infrastructure Levy are identified in the <a href="Infrastructure Funding Statement">Infrastructure Funding Statement</a>. Key infrastructure projects are identified in the table below.

Infrastructure project	Delivery progress	Link to further information			
Suffolk Coastal Local Plan	Suffolk Coastal Local Plan				
Double tracking of the Felixstowe branch line and upgrade of level crossings (Network Rail)	Complete.	Network Rail			
A12 improvements east of Ipswich	Brightwell Lakes is now commencing development and will bring forward substantial A12 improvements as conditions of that consent. In additions to this, in March 2020, funding was awarded from DfT to Suffolk County Council to work on an outline business case for improvements to the A12 east of Ipswich at Martlesham, along with approval to develop a strategic outline business case for the A12 at Woodbridge. Suffolk County Council carried out a public consultation in February 2021 on proposals to inform submission of a business case to DfT in November 2021.	Suffolk County Council			
A14 junction improvements	Improvements at Copdock - DfT have identified improvements to the Copdock junction in the Roads Investment Strategy 3 pipeline. More recently, although beyond the monitoring period, in October 2021, National Highways commenced a consultation on options for improvements to Copdock junction.	DfT RIS2 A14 Junction 55 Copdock Interchange Public Consultation - National			

Infrastructure project	Delivery progress	Link to further information
		Highways - Citizen Space
Waveney Local Plan – Po	licy WI P1 3 Infrastructure	<u>Citizen Space</u>
Waveney Local Plan – Po Lowestoft Flood Risk Management Project	Tidal: Planning permission granted May 2020 for construction of flood walls around the Outer Harbour (DC/19/2753/RG3). £43m Government funding awarded July 2020. Construction of tidal flood walls commenced April 2021 and is progressing well, with the tidal barrier completion expected in spring 2026  Fluvial: Planning permission granted May 2020 for fluvial flood wall along Kirkley Stream and construction of pumping station (DC/19/0210/FUL). Works commenced June 2020 and were completed summer 2021	Lowestoft Flood Risk Management Project
Brooke Peninsula Pedestrian and Cycle Bridge	Phase 1 requires implementation of Normanston Park Pedestrian and Cycle Bridge (see below). Phase 2 will see pedestrian and cycle linkages continued over Lake Lothing once phase 1 is complete	
Normanston Park Pedestrian and Cycle Bridge	Planning permission granted November 2019 (DC/19/2796/RG3)	
Beccles Southern Relief Road	Complete (opened September 2018)	
A47 improvements between Lowestoft and Peterborough	The Council is one of the partners of the A47 Alliance which works towards improving the A47 across East Anglia. The Just Dual It! campaign was launched in March 2019 with the aim to gain government funding to dual the entire A47 by 2030. The dualling or improvement of a number of sections of the A47 in Norfolk have been committed to in DfT Road Investment Strategy 2 (2020-2025), published March 2020. Public examination of three schemes in Norfolk – Blofield-Burlingham dualling; North Tuddenham-Easton dualling; and Thickthorn (A47/A11) junction improvements – has commenced in autumn 2021	Norfolk County Council DfT RIS2

Infrastructure project	Delivery progress	Link to further information
Improvements to the A146 between Lowestoft and Norwich	Suffolk County Council continues to explore options to improve the Barnby Bends section of the A146 between Lowestoft and Beccles. This project was put forward as a shortlisted scheme by Transport East as part of its Major Road Network Programme in 2019. The scheme has been accepted into the pipeline for the 2020-2025 period. Initial key stakeholder engagement took place in March and April 2021. The feedback is informing options to be considered as part of the Strategic Outline Business Case. Further scheme development and public consultation is anticipated in 2022.	

#### Suffolk Coastal Local Plan

- 7.173 The double tracking of the Felixstowe branch line has been completed, increasing the efficiency of Felixstowe Port, the largest container port in the country. Such improvements will help to support the economic policies in the Local Plan considering that the Port of Felixstowe is a major employer in the District.
- 7.174 Brightwell Lakes is now commencing development and will bring forward substantial A12 improvements as conditions of that consent. In addition to this, funding from DfT awarded to Suffolk County Council to work on an outline business case for improvements to the A12 east of Ipswich at Martlesham, along with approval to develop a strategic outline business case for the A12 at Woodbridge, was announced in March 2020. Suffolk County Council carried out a consultation in February 2021 on proposals to inform submission of a business case to DfT and the business case bid was submitted in November 2021.
- 7.175 A14 junction improvements at Copdock are identified in the pipeline for Roads Investment Strategy 3 (2025-2030) by the Department for Transport, and a consultation was launched in October 2021 with various options. Although outside the district, the Copdock junction is identified in the Infrastructure Delivery Framework of the Suffolk Coastal Local Plan as a strategically significant location.

#### Waveney Local Plan

7.176 The Lowestoft Flood Risk Management Project will provide greater protection from flooding from the sea, rivers and extreme rainfall. Construction of a flood wall and pumping station along Kirkley Stream completed summer 2021. Along with a number of property level resilience measures, these works will reduce the risk of river and surface water flooding to homes in Velda Close and Aldwyck Way. The construction of tidal flood walls and tidal barrier around the Outer Harbour will provide

- protection from the sea. Ground investigation works have been carried out ahead of the construction of tidal flood walls which are expected to complete summer 2022.
- 7.177 The Brooke Peninsula Pedestrian and Cycle Bridge and Normanston Park Pedestrian and Cycle Bridge are key pieces of infrastructure to support the development of Lowestoft, namely through interactions with policy WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood. The Council continues to progress with delivery of the Normanston Park Bridge by securing the appropriate funding. Once this phase is completed, work will begin to develop the Brooke Peninsula Bridge over Lake Lothing.
- 7.178 Improvements to the A12, including the Four Villages Bypass, were identified as part of the development of the Waveney Local Plan. A funding bid to the Department for Transport was rejected in June 2019, but a Two Villages bypass is proposed as part of the mitigation measures for Sizewell C.

#### Delivery of infrastructure projects summary

Progress has been made on numerous infrastructure projects across the District that are needed to support future development, with significant milestones being reached such as the granting of the Development Consent Order and commencement of works for the Lake Lothing Third Crossing (Gull Wing bridge). The East Suffolk Local Plans identify these projects and others that will support the growth outlined in the plans, as well as the mechanisms that will be used to deliver them.

#### **Next steps**

 Continue to work with infrastructure providers to ensure projects are delivered to support development

## Progress on delivery of Site Allocations (Local Plans and Neighbourhood Plans)

- 7.179 This section provides information and an assessment on the progress made towards delivering the sites allocated for development in the adopted Local Plans and made Neighbourhood Plans in East Suffolk.
- 7.180 A full list of all sites allocated in the Suffolk Coastal and Waveney Local Plans and Neighbourhood Plans is available at the Council's Open Data Portal: <a href="http://data-eastsuffolk.opendata.arcgis.com">http://data-eastsuffolk.opendata.arcgis.com</a>. This provides information on planning application status, delivery to date and relevant comments as at 31<sup>st</sup> March 2021. The <a href="Statement of Housing Land Supply">Statement of Housing Land Supply</a> (October 2021) provides details of anticipated rates of delivery.
- 7.181 Residential Development Briefs are being produced for a number of allocations within both East Suffolk Local Plans. The residential development briefs will highlight the considerations that any development on the site will need to respond to and outlines the Council's aims for the site whilst allowing for innovative design. The development briefs will be adopted as <a href="Supplementary Planning">Supplementary Planning</a>
  <a href="Documents">Documents</a> and will carry weight in the determination of any planning applications for the site.

#### **Neighbourhood Plans**

7.182 A number of Neighbourhood Plans allocate sites for specific uses. The table below provides a summary of Neighbourhood Plan allocations subject to planning application as at 31st March 2021.

Policy ref	Policy location	Policy description	Progress Summary
Bredfield N	leighbourhood Plan (2021)		
BDP14 (Site 459)	Land to the east of Woodbridge Road, Bredfield	Allocated for up to 10 dwellings	Planning permission for 10 dwellings granted 15/09/2020 (DC/20/2142/ARM)
Framlingha	m Neighbourhood Plan (2	017)	
FRAM19	Land off Saxtead Road, Framlingham	Allocated for up to 30 dwellings	Planning permission for 24 dwellings granted 26/02/2019 (DC/18/2445/FUL) 24 dwellings completed
FRAM20	Land west of New Street, Framlingham	Allocated for B1 employment uses	Outline planning permission for employment uses granted 05/09/2017 (DC/16/4370/OUT) Revised application (DC/21/1712/OUT) currently pending
FRAM22	Land off Vyces	Allocated for community	14 dwellings completed

Policy ref	Policy location	Policy description	Progress Summary
	Road/Brook Lane, Framlingham	use and up to 15 dwellings	(DC/15/0960/FUL)
FRAM23	The Green Shed, Fore Street, Framlingham	Demolition of existing buildings and replacement with eight new dwellings & a single B1(a) office	Planning permission for 8 dwellings & one B1(a) office granted 02/05/2017 (DC/16/5386/FUL). Office and 8 dwellings completed
FRAM26	Station Terrace, Framlingham	Allocated for residential development for up to 15 dwellings	Outline planning permission for 4 dwellings granted 13/11/2020 (DC/20/2356/OUT)
Leiston Ne	ighbourhood Plan (2017)		
SA1	Land at Highbury Cottages, Saxmundham Road, Leiston	Allocated for residential development of up to 150 dwellings and land for cemetery extension	Approval of Reserved Matters (DC/19/1883/ARM) granted January 2020 for up to 187 dwellings. 5 dwellings completed, 68 under construction
SA2	Land at Red House Lane, Leiston	Allocated for residential development of approximately 70 dwellings	Planning permission for 65 dwellings approved 27/03/2018 (DC/17/1605/FUL) 65 dwellings completed
SA3	Land the rear of St Margaret's Crescent, Leiston	Allocated for residential development of up to 70 dwellings	Outline planning permission for up to 77 dwellings granted 29/06/2017 (DC/16/2104/OUT). Reserved matters application currently pending (DC/21/1548/ARM)
SA4	Land at Abbey Road, Leiston	Allocated for residential development of approximately 100 dwellings and minimum 1,000m² class B1 floorspace	Outline planning permission for a mixed use scheme including 100 dwellings, 1,000m² employment floorspace and public house/restaurant granted 07/06/2017 (DC/16/1322/OUT) Outline planning permission for a mixed-use scheme as above currently pending (DC/20/5181/OUT)
Melton Ne	ighbourhood Plan (2018)		

Policy ref	Policy location	Policy description	Progress Summary
MEL20	Land off Wilford Bridge	Allocated for mixed use	Outline application for
	Road, Melton	development including	residential development of up to
		9,000m2 serviced B1	55 dwellings received a
		business floorspace and	resolution to grant planning
		residential development	permission at Planning
		of approximately 55	Committee in March 2021
		dwellings	(DC/20/1831/OUT)
Kessingland	d Neighbourhood Plan (20	17)	
CI4	Land off Church Road, Kessingland	Provision of additional care facilities	Planning permission for a 60-bed care home granted 13/04/2017 (DC/16/2868/FUL). NB DC/20/3124/AEA extends planning consent until 21 May 2021

7.183 Across East Suffolk, Neighbourhood Plans allocate sites for a variety of uses including housing, employment, education and care facilities. As at 31<sup>st</sup> March 2021, planning permissions on Neighbourhood Plan allocations total 489 new homes, 60-bed care home and employment development. A site for a further 55 homes (MEL20) also has a resolution to grant planning permission. Of the 489 homes with planning permission, 68 dwellings are under construction and 116 have been completed (as at 31<sup>st</sup> March 2021).

#### **Suffolk Coastal Local Plan**

7.184 A number of site allocations have been carried over from the previous Local Plan and are subject to extant planning permission. The table below provides a summary of Local Plan allocations subject to planning applications as at 31<sup>st</sup> March 2021.

Policy ref	Policy location	Policy description	Progress Summary
SCLP12.3	North Felixstowe	Leisure led	Part of the site [Land at
	Garden	development	Candlet Road] has outline
	Neighbourhood	comprising leisure	consent for 560 dwellings,
		centre, primary school,	local community centre, 60-
		open space and green	bed care home, 50 assisted
		infrastructure,	living units, two small business
		employment land, up to	units and open space
		2,000 dwellings and	(DC/15/1128/OUT). Approval
		retirement community	of reserved matters for 255
			dwellings permitted
			02/02/2021

Policy ref	Policy location	Policy description	Progress Summary
			(DC/20/1002/ARM)
SCLP12.6	Land at Sea Road, Felixstowe	Mixed use development of commercial / tourism uses and approximately 40 dwellings	Planning permission for commercial units, 48 flats & 11 houses granted 06/07/2018 (DC/17/3967/FUL)
SCLP12.30	Land north-east of Street Farm, Saxmundham	Residential development of approximately 40 dwellings	Planning permission for 59 dwellings granted 11/03/2019 (DC/18/0702/FUL). 43 dwellings completed and 12 under construction
SCLP12.32	Former Council Offices, Melton Hill, Woodbridge	Residential led mixed use development of approximately 100 dwellings	Planning permission for 100 dwellings, community space and retail unit granted 29/11/2019 (DC/19/2641/FUL)
SCLP12.42	Land to the East of Aldeburgh Road, Aldringham Cum Thorpe	Residential development of approximately 40 dwellings	Planning permission for 40 houses granted 07/08/2019, 18 completed and 22 under construction (DC/18/2325/FUL)
SCLP12.44	Land to the South East of Levington Lane, Bucklesham	Residential development of approximately 30 dwellings	Outline planning permission for up to 33 dwellings permitted 11/09/2020 (DC/19/4510/OUT)
SCLP12.48	Land North of The Street, Darshan	Residential development of approximately 25 dwellings	Planning permission for 26 dwellings permitted 10/08/2020 and works commenced January 2021 (21 plots under construction) (DC/19/1462/FUL)
SCLP12.51	Land west of Chapel Road, Grundisburgh	Residential development of approximately 70 dwellings	Two identical planning applications for 70 dwellings pending decision (DC/20/3284/FUL and DC/20/3362/FUL)
SCLP12.52	Land South of Ambleside, Main Road, Kelsale Cum Carlton	Residential development for approximately 30	Planning permission for 42 dwellings granted 30/08/2019 (DC/18/2621/FUL)

Policy ref	Policy location	Policy description	Progress Summary
		dwellings	
SCLP12.57	Land North of Mill Close, Orford	Residential development of approximately 10 units	Planning permission for 11 dwellings granted 04/11/2020 (DC/19/2513/FUL)
SCLP12.60	Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)	Residential development of approximately 150 dwellings	Planning permission for 129 dwellings and public open space (full planning application) and 7 serviced Self Build Plots (outline planning application) approved by Planning Committee January 2021 subject to S106 (DC/20/3264/FUL). Planning consent issued after monitoring period (June 2021)
SCLP12.61	Land west of Garden Square, Rendlesham	Residential development of approximately 50 dwellings and open space	Planning application for 75 dwellings and open space (DC/20/5278/FUL). Planning consent issued after monitoring period (May 2021)
SCLP12.64	Land off Howlett Way, Trimley St Martin	Residential development of approximately 360 dwellings and open space	Outline planning application for up to 340 dwellings, early years facility and open space pending consideration (DC/20/1860/OUT)
SCLP12.65	Land adjacent to Reeve Lodge, High Road, Trimley St Martin	Residential development of approximately 150 dwellings, primary school and open space	Outline planning application for up to 139 dwellings, land for primary school and open space pending decision (DC/20/2579/OUT)
SCLP12.69	Land at Cherry Lee, Darsham Road, Westleton	Residential development of approximately 15 dwellings	Outline planning application for 15 dwellings pending decision (DC/20/4709/OUT)

7.185 Allocated sites in the Suffolk Coastal Local Plan are expected to deliver 5,335 new homes which are all expected to be delivered within the plan period. As at 31 March 2021, extant outline and full planning permissions have been granted for 897 homes on these allocated sites with 61 new homes completed and 55 under construction. A further two sites, for 136 dwellings (SCLP12.60) and 75

dwellings (SCLP12.61), have since received planning consent (issued May and June 2021). In addition, SCLP12.19 sets out policy relating to the development of 2,000 dwellings at Brightwell Lakes, subject to an outline planning application approved in April 2018.

#### **Waveney Local Plan**

7.186 The table below provides a summary of Local Plan allocations subject to planning application as at 31st March 2021.

Policy ref	Policy location	Policy description	Progress Summary
WLP2.4	Kirkley Waterfront	Mixed use including	Waveney Works - Consent for
	and Sustainable Urban	residential development	31 dwellings
	Neighbourhood	(approximately 1,380	(DC/17/3145/VOC) with 6
		dwellings), employment	dwellings completed
		development	Former Sanyo Site - Hybrid
		(approximately 7.5	planning application granted
		hectares), primary school,	for 300 dwellings
		playing field and local	(DC/15/2004/RG3)
		retail centre	Brooke Peninsula and Jeld
			Wen Site, Waveney Drive –
			Lapsed consents: Outline
			consent granted for a
			residential-led mixed use
			redevelopment of up to 850
			dwellings including
			commercial uses (A1-A5),
			marina building, primary
			school and open space
			(DC/13/3482/OUT). Approval
			of reserved matters for Phase
			1 (69 dwellings) approved July
			2018 (DC/18/1728/ARM).
WLP2.5	East of England Park	Destination park with	Erection of play equipment
		supporting uses (7.87	permitted June 2019
		hectares)	(DC/19/1310/FUL) - The Ness
			opened November 2020
WLP2.6	Western End of Lake	Residential development	12 dwellings completed
	Lothing	(approximately 57	(DC/19/2073/FUL and
		dwellings), marine-	DC/18/4874/FUL)
		focused employment	6 dwellings granted March
		development and tourism	2021 (DC/20/4890/FUL)
			Outline consent lapsed for 44
			dwellings (DC/14/2986/OUT)

Policy ref	Policy location	Policy description	Progress Summary
WLP2.18	Land at Mobbs Way, Oulton	Employment development (2.8 hectares)	Various planning permissions granted and implemented on 0.51ha (1,497m²) for B1-B8 units
WLP3.2	Land west of London Road, Beccles	Residential development of approximately 280 dwellings	Hybrid planning application granted November 2019 for 217 dwellings (full permission) and 11 serviced self build plots (outline). 25 dwellings are under construction as at 31 March 2021 (DC/18/4312/FUL). Part of the allocation (approx. 39 dwellings) not yet subject to a planning application
WLP3.3	Land south of Benacre Road, Ellough	Employment development (13.4 hectares)	Planning applications approved for employment units and 2,050m <sup>2</sup> floorspace / 0.60 hectares completed (DC/17/2107/FUL and DC/17/3526/FUL)
WLP4.1	Halesworth/Holton Healthy Neighbourhood	Mixed use including residential development (approximately 215 dwellings), health care facility and retirement community, sports facilities and education / training facility	Majority of the site for residential development covered by outline planning permission granted October 2019 for up to 190 dwellings (DC/18/4947/OUT).  Applications for change of use to sports facilities and construction of retirement community pending consideration (DC/21/0007/FUL and DC/21/0027/FUL)
WLP4.2	Land adjacent to Chediston Street, Halesworth	Residential development of approximately 200 dwellings	Outline planning permission granted May 2019 for the construction of up to 200 dwellings (DC/17/3981/OUT)
WLP5.2	Land west of St Johns Road, Bungay	Residential development for approximately 400 dwellings and	Part of the site has outline planning permission for 150 dwellings and 3 hectares of

Policy ref	Policy location	Policy description	Progress Summary
		employment development (3 hectares)	employment land (granted March 2016, DC/14/4193/OUT) and approval of reserved matters issued May 2020 for 150 dwellings (DC/18/4429/ARM). The rest of the site (approx. 250 dwellings) not yet subject to a planning application
WLP6.1	Land west of Copperwheat Avenue, Reydon	Residential development for approximately 220 dwellings	An outline planning application for 220 dwellings was considered by Planning Committee in March 2020 and resolved to approve subject to Section 106. Following the 'making' of the Reydon Neighbourhood Plan in May 2021, the application was returned to Planning Committee September 2021. Planning consent granted 16 September 2021 (DC/19/1141/OUT)
WLP7.13	Land north of Chapel Road, Mutford	Residential development of approximately 6 dwellings	Outline consent of 6 dwellings granted January 2021 (DC/20/3366/OUT)
WLP7.14	School Road, Ringsfield	Residential development of approximately 24 dwellings and school car park	Outline application for up to 33 dwellings and visitor car park refused May 2021 (DC/20/1001/OUT)

7.187 The Waveney Local Plan allocates land for 7,201 new homes of which 6,202 are expected to be delivered within the plan period. As at 31 March 2021, extant outline and full planning permissions have been granted for 1,123 homes on these allocated sites with 18 new homes completed and 25 under construction. A further site for 220 dwellings (WLP6.1) has received planning consent (issued September 2021).

#### **Site Allocations Summary**

Housing coming forward on allocated sites represents a significant proportion of committed supply as at 31<sup>st</sup> March 2021, albeit in the former Suffolk Coastal area in particular there are a number of developments being implemented related to sites granted permission at a point when site allocations were not in place.

The information presented in the table above demonstrates that the delivery of site allocations is progressing, albeit that there are a number of site allocations which do not yet benefit from planning permission. It is anticipated when allocating sites that delivery would take place over a number of years, with some sites not anticipated to come forward immediately.

#### **Next steps**

- Continuous engagement with landowners and developers to ensure site specific policies are delivered
- Implementation and monitoring of actions identified through the Housing Action Plan
- Monitoring of housing coming forward through the preparation of the annual 5 Year
   Housing Land Supply Statement
- Preparation of Residential Design Brief Supplementary Planning Documents to help deliver site specific policies
- Continue to support Neighbourhood Plan groups in identifying appropriate site allocations

## 8 Sustainability Appraisal

- 8.1 This chapter reports on the Sustainability Appraisal (SA) indicators for the monitoring period 2020/21. Appendix 3 sets out the indicators from the Waveney and Suffolk Coastal Local Plan Sustainability Appraisals in full. The indicators are taken from the SAs supporting the Waveney Local Plan adopted March 2019 and the Suffolk Coastal Local Plan adopted September 2020.
- 8.2 Monitoring of SA indicators is a key requirement of the SA process. Monitoring enables the significant effects of implementing the Local Plan sites and policies to be assessed and compared to those predicted in the SA report. It helps to ensure that any unforeseen adverse effects can be identified, and remedial action taken if required.
- 8.3 Whilst some indicators are monitored annually by the Council or external bodies, others are monitored less frequently for example through the national Census. Results for some indicators will change rapidly to signal recent changes such as housing completions or employment figures. Others such as health will show changes and trends over a longer timescale. This means that it is not always possible, practical or useful to report on every indicator every year. Where data is not available, this has been noted in the table in Appendix 3.

#### **Significant Effects**

8.4 The identification of significant effects is a key component of the SA process. Significant effect indicators are those indicators based on the objectives set out in the Council's SA, and they look at the wider effects of the Local Plan on the district.

#### **Suffolk Coastal Local Plan Significant Effects**

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

#### **Summary of Significant Effects: Suffolk Coastal Local Plan**

Sustainability Objective	Type of effect	SA Indicator
To meet the housing	Positive	New homes completed in the monitoring year;
requirements of the whole		New homes approved in the monitoring year;
community		Recorded homeless rates;
		Net additional dwellings – size, type,
		affordable.
To conserve and enhance soil	Negative	Percentage of development recorded on
and mineral resources		greenfield / brownfield land;

Sustainability Objective	Type of effect	SA Indicator
		Change in recorded soil quality;
		Allocations recorded on best agricultural land
		quality (1,2,3).
To achieve sustainable levels of	Positive	Estimated new job creation;
prosperity and economic		Net additional gains in employment land
growth throughout the plan		development;
area		Business formation rate;
		Number of businesses paying business rates;
		Numbers employed by industry.

#### **Housing requirements**

- 8.6 511 new homes were completed in the former Suffolk Coastal area for 2020/21, a decrease of 104 homes on the previous year. The decrease in housing completions is likely the result of difficulties within the building trade caused by the pandemic. 18% of all new homes completed were affordable homes (90 no.). Overall, 1,759 new homes have been delivered in the plan period (2018-21), exceeding the annual requirement 542 dwellings per year and 23% are affordable homes. The Strategic Housing Market Assessment (2017) identifies a need for 1,118 additional spaces in care homes and nursing homes to 2036. Although only 2 net additional bedspaces have been completed over the plan period, there are a number of extant planning permissions for additional bed spaces in existing or new care homes and the Garden Neighbourhood site allocations require the provision of retirement community/care homes and other specialist housing.
  - 8.7 Within Suffolk Coastal, extant planning consents permit 4,919 new homes of which 23% are for affordable homes (as at 31 March 2021).

#### Soil and mineral resources

8.8 This monitoring year, 31.5% of housing completions were on previously developed land, double the percentage recorded in the previous year. 47% of employment completions (E(g), B2 and B8) were on previously developed land (0.43 hectares).

#### Employment, prosperity and economic growth

Although 10,600m<sup>2</sup> of employment floorspace has completed, with employment losses of 28,140m<sup>2</sup>, a net loss of 17,496m<sup>2</sup> is reported this year. However, this is not translated into a net loss of employment land with a net gain of 0.4 hectares developed. The majority of the floorspace lost is related to the demolition of a vacant six-storey office building located within the Port of Felixstowe, site will remain in employment use and is to be re-developed as a storage and distribution.

- 8.9 Within the employment areas/allocations defined in the Suffolk Coastal Local Plan, almost a quarter of all units are use class E(g)(i) Offices with storage or distribution uses (B8) accounting for 20% of units. However, (within the areas surveyed) the Port of Felixstowe, Bentwaters, Rendlesham and Martlesham Heath all had a high proportion of B8 uses (storage and distribution), given their good connectivity to rail and/or roads.
- 8.10 Within East Suffolk, the largest employee jobs sector is wholesale and retail sale at 16% followed by manufacturing and transportation and storage the next largest sectors both at 10%.
- 8.11 Unemployment in East Suffolk (4.6%) is similar to the East of England at 4.3%, and the national figure of 4.9%.

#### **Waveney Local Plan Significant Effects**

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

#### **Summary of Significant Effects: Waveney Local Plan**

Sustainability Objective	Type of effect	SA Indicator
To conserve natural resources	Negative	Number and percentage of dwellings completed on previously developed land;  Area of high grade agricultural land lost to housing and
		economic development.
To improve the health and well-being of the population	Positive	Proportion of journeys to work on foot or by cycle; Percentage of population completing 3x30 minutes physical activity per week; Obesity in the population; Life expectancy.
To improve access to key services and facilities	Positive	Accessibility to key services and facilities.
To meet the housing requirements of the whole community	Positive	Amount and type of new housing, including extra care/sheltered housing and number of care/nursing home beds.
To achieve sustained and resilient economic growth	Positive	Amount and type of employment (B1, B2 and B8), retail and leisure development (A1-A5 and D2); Jobs density;

Sustainability Objective	Type of effect	SA Indicator
		Employment by occupation;
		Employee jobs by industry.
To enhance the rural	Positive	Employment uses (B1, B2 and B8) completed in the
economy		rural areas;
		Amount and type of new housing, including extra
		care/sheltered housing and number of care/nursing
		home beds within the rural areas.

#### **Natural Resources**

- 8.2 In the monitoring year, 29% of new housing was completed on previously developed land. This is a reduction on the previous year of 50% and it is expected the number of homes on previously developed land will decrease in future years as the majority of housing allocations in the Local Plan are on greenfield sites. 20% of new homes allocated are on previously developed land including 1,380 at Kirkley Waterfront and Sustainable Urban Neighbourhood (Policy WLP2.4).
- 8.3 The efficient use of land also contributes to the conservation of natural resource and Policy WLP8.32 Housing Density and Design of the Local Plan expects residential development to make the best use of the site. Development in and around the built up area of Lowestoft and the market towns should aim for urban scale development of at least 30 dwellings per hectare. This monitoring year, one scheme of 10 or more dwellings has completed and achieves a density of 28 dwellings per hectare. The application provides 33 sheltered housing units within the grounds of an existing car home.
- The loss of high-grade agricultural land is also identified in the Sustainability Appraisal report as an indicator of natural resource conservation. Defra's Agricultural Land Classification (ALC) system<sup>8</sup> assesses the quality of farmland and divides it into five categories, Grade one is best quality and Grade five is poorest quality. The 'best and most versatile land' is defined by the National Planning Policy Framework as that which falls into Grades 1, 2 and sub-grade 3a. This data is not routinely monitored for all the completions, but it is possible to review completions on major sites. For the monitoring year 3 schemes of 10 or more dwellings (or 0.5ha or more) have been completed of which 2 are within the curtilage of a residential dwelling and a care home. The third application is a rural exception site for 22 dwellings (16 affordable subsidised by 6 market homes) (1.1 hectares) adjacent to the settlement boundary of Halesworth. The site is not classified by Defra as agricultural land. One major employment use (E(g), B2 or B8) has completed this monitoring year, a part retrospective application for the retention of a warehouse (2,800m²) within the curtilage of an existing business located within the Beccles Business Park.

https://naturalengland-defra.opendata.arcgis.com/datasets/agricultural-land-classification-alc-grades-post-1988-england?geometry=1.664%2C52.441%2C1.745%2C52.450

8.5 As noted above, a number of housing allocations in the Local Plan are on greenfield sites many of which (particularly in the rural areas) are on agricultural land therefore loss of agricultural land may increase in future years once these sites are developed.

#### **Health and Well-being**

- 8.6 The Office for National Statistics (ONS) dataset on life expectancy estimates for people of all ages in the UK show that, in East Suffolk, people under the age of one year between 2018-2020 can expect to live to 83.8 years of age if they are female, or 80.4 years of age if they are male. These figures are similar to the averages for England at 83.1 years for females and 79.4 years for males.
- 8.7 The Public Health England Public Health Profile dataset shows that the percentage of East Suffolk adults (aged 18+) classified as overweight or obese between 2019/20 is 63.5%, which is slightly higher than the regional and national average of 62.8% and 62.3% respectively.
- 8.8 When comparing the census figures for 2001 and 2011, there was a decrease in the percentage of sustainable transport modes used to get to work in the former Waveney area. As well as this, there has been an increase in the use of non-sustainable modes. This data is ten years old and it is expected some data from the 2021 data will be released in spring 2022. The longer-term effects of the COVID-19 pandemic on working patterns will emerge over the coming years. The Waveney Local Plan contains a number of policies that seek to increase the use of sustainable modes and WLP1.3 'Infrastructure' outlines that the Council will work with the telecommunications industry to maximise the use of super-fast broadband which could assist with home working.

#### **Access to Key Services**

8.9 Monitoring access to the key services has been identified as an area where further work is needed to the establish a standardised monitoring process across the District. Progress on this will be reported in future AMRs.

#### **Housing Requirements**

8.10 201 new homes were completed in the former Waveney area during 2020/21, an increase on the 156 completed in the previous year but lower than the 297 homes completed 2018/19. 42 of the 201 homes completed this year are affordable homes. Overall, 27% of all housing completed between 2014-21 is affordable housing (401 of 1,473 new homes). This monitoring year, a 9-bedroom extension has been completed at an existing care home in Lowestoft. Over the plan period (2014-20) a net gain of 82 bedrooms within care homes has been recorded.

#### **Economic Growth**

8.11 Although almost 5,700m² of employment floorspace has completed, with employment losses of 6,180m², a net loss of 487m² is recorded this monitoring year. Although a net loss of floorspace is reported this year, this is an improvement on the net losses reported over the last two years: 5,342m² (2019/20) and 1,764m² (2018/19). The majority of the floorspace lost is attributed to two

sites of which one is not on a protected employment site and is being re-developed as a retirement community including care home. The other loss in within the PowerPark (WLP2.2) and although floorspace is lost the site is to be retained as employment land. A third of units on protected employment sites are for storage or distribution uses (B8).

8.12 In East Suffolk 16% of the workforce is employed in wholesale and retail sale. Manufacturing and transportation and storage are the next largest sectors both at 10%. The majority of manufacturing businesses are located in the former Waveney area and transportation and storage business are related to the Port of Felixstowe in the former Suffolk Coastal area. Unemployment in East Suffolk (4.6%) is similar to the East of England at 4.3%, and the national figure of 4.9%.

#### **Rural Economy**

- 8.13 A small amount of employment floorspace (B1/E(g), B2-B8 uses) has completed in the rural areas (outside of protected employment areas, employment allocations and settlement boundaries). This comprises two business offices totalling 110m² floorspace in Holton and Lowestoft.
- 8.14 A number of tourism uses have been permitted in the rural areas in the form of self-catering holiday accommodation or camping/caravan sites.
- 8.15 Policies WLP1.1 and WLP7.1 set out the scale and location of growth in the former Waveney area with half (56%) of future development allocated to Lowestoft as the largest town with its potential for economic growth. The rural areas are expected to accommodate 10% of housing development. This monitoring year, 5% of housing completions were in the rural areas a reduction of almost a third of completions in the previous year. Over the plan period as a whole, it is anticipated that housing delivery will be consistent with the distribution strategy.

# Appendix 1 - List of Indicators and data sources

Indicator	Data source	Local Plan
Employment, Retail and Leisure and Tourism		
Amount and type of employment land completed (sqm floorspace / hectares)	Monitoring of planning applications	SC / W
Percentage of uses within existing employment areas	Employment surveys	SC / W
Percentage of vacant units within existing employment areas	Employment surveys	SC / W
Number and type of applications approved to support farm diversification	Monitoring of planning applications	SC
Amount and type of new retail and leisure development completed	Monitoring of planning applications	SC / W
Percentage of uses within town centres	Retail surveys	SC / W
Percentage of vacant units within town centres	Retail surveys	SC / W
Expansion / creation of Shared Space and Dementia Friendly areas (town centre environments)	ESC monitoring	SC
Applications permitting new / loss of tourist accommodation & development	Monitoring of planning applications	SC / W
Total day trips, total staying trips total visitor spend	Suffolk Means Business - Economic Impact of Tourism, Destination Research	W
Jobs density	ONS jobs density	SC / W
Employee jobs by industry	ONS Business Register and Employment Survey	SC / W
Employment by occupation	ONS Annual Population Survey	SC / W
Earnings by residence and workplace	ONS Annual Population Survey	SC / W
Employment and unemployment	ONS Annual Population Survey	SC/W
Qualifications of working age population (aged 16-64)	ONS Annual Population Survey	SC / W

Indicator	Data source	Local Plan
GCSE Results - % of pupils achieving strong 9-5 passes in both English and mathematics GCSEs	GOV.UK	W (also reported for SC)
Housing		
Net additional homes completed	Housing completions	SC / W
Affordable homes completed	Housing completions	SC / W
Gypsy and Traveller pitches permitted/completed	Planning application monitoring / Housing completions	SC / W
Total housing delivered within plan period	Housing completions	SC / W
Type and size of completed dwellings (gross completions)	Housing completions	SC / W
Number and percentage of affordable housing completed by tenure	Housing completions	SC / W
Number of refusals for self-contained flats/HMOs within Flat Saturation Zones as identified on the Policies Map	Monitoring of planning applications	W
Net additional bedrooms in C2 care homes	Housing completions	SC / W
% of housing development by settlement hierarchy 2018/19	Housing completions	SC / W
% of housing development in the countryside – outside of settlement boundaries (Local Plans and Neighbourhood Plans)	Housing completions	SC / W
% of residential development in Lowestoft and the market towns achieving at least 30 dwellings per hectare	Housing completions	W
% of new housing completed on previously developed land	Housing completions	SC / W
Number of entries on self build / custom build register	Self Build / Custom Build Register	SC / W
Number of plots approved for self or custom build	Monitoring of planning applications	SC / W
Developments of 100 or more dwellings to provide 5% self or custom build properties	Monitoring of planning applications	SC / W
Affordable housing on residential developments (permissions)	Monitoring of planning applications	SC / W
Population estimates	ONS population estimates	SC / W
Homelessness	MHCLG Homelessness	SC / W

Indicator	Data source	Local Plan
	statistics	
Housing affordability	ONS ratio of median house price to median earnings (workplace-based earnings)	SC / W
Transport		
Number of applications permitted which are contrary to Suffolk County Council Parking Standards	Monitoring of planning applications	SC (also reported for W)
Submission of Transport Statements for residential developments between 50-80 dwellings and submission of Transport Assessments and Travel Plans for residential developments over 80 dwellings	Monitoring of planning applications	SC / W
Provision of pedestrian and cycle access / public rights of way. Implementation of measures set out in the Waveney Cycle Strategy (2016 and updates)	Monitoring of planning applications / Suffolk County Council / Community Infrastructure Levy spend	W
Traffic counts (motor vehicles and cyclists)	Department for Transport traffic counts	SC / W
Community Facilities and Assets		
Applications permitting new / loss of community services and facilities	Monitoring of planning applications	SC / W
Applications permitting new / loss of open space including allotments	Monitoring of planning applications	SC / W
Proportion of population with access to different types of open space	Geographical Information System Analysis	SC / W
Proportion of population with access to key services and facilities	Geographical Information System Analysis	SC/W
Number of cultural facilities in the District – applications permitting new / loss of cultural facilities	Monitoring of planning applications	W (also reported for SC)
Climate Change		
New non-residential development of 1,000m <sup>2</sup> or more gross floorspace achieving BREEAM 'Very Good' standard or equivalent	Monitoring of planning applications	SC / W
Sustainability Statement to be submitted with applications for 10 or more houses	Monitoring of planning applications	W

Indicator	Data source	Local Plan
Number and proportion of residential developments of more than 10 dwellings achieving a reduction of 20% in CO <sub>2</sub> emissions below the Target Emission Rate	Monitoring of planning applications	SC
Number of renewable energy schemes permitted	Monitoring of planning applications	SC / W
Number of properties at risk from flooding	Environment Agency and East Suffolk Council	SC W
Number of properties at risk from coastal erosion	Environment Agency and East Suffolk Council	SC / W
Applications permitted in flood zones - planning applications approved against Environment Agency advice on the basis of flood risk.	Environment Agency / Planning application monitoring	SC / W
Number and type of permissions granted within the Coastal Change Management Area	Monitoring of planning applications	SC / W
Number of replacement homes permitted under coastal relocation / replacement policy	Monitoring of planning applications	SC / W
Carbon Dioxide Emissions	Department of Energy and Climate Change	Waveney Strategic Priority indicator
Design		
Major residential developments performing positively (obtaining 'green' scores) against Building for Life 12. [for 'major residential developments' i.e. 10 or more dwellings]	Monitoring of planning applications	SC /W
Sites with a capacity of 10 or more dwellings to make provision for 40% (Waveney Local Plan) or 50% (Suffolk Coastal Local Plan) of all dwellings to meet Building Regulations Requirement M4(2) of Part M	Monitoring of planning applications	SC / W
Number of applications permitted of high residential amenity standards	Monitoring of planning applications	SC
Natural Environment		
Habitat mitigation (Adoption of Recreational Avoidance and Mitigation Strategy)	CIL and S106 Officer (financial) / Ecologist (projects)	SC (also reported for W)
Condition of Sites of Special Scientific Interest	Natural England	SC / W
Hectares of designations e.g. Area of Outstanding Natural Beauty, Special Protection Areas, Special Areas of Conservation, Ramsar Sites	Natural England / Suffolk Biodiversity Information Service	SC / W
Number of applications permitted within gaps – Coalescence of Settlements [excluding householder applications]	Monitoring of planning applications	SC / W

Indicator	Data source	Local Plan
Number of new carpark spaces within 1km of European sites	Monitoring of planning applications	SC
Number of applications which have an impact on the natural, historic and built environment	Monitoring of planning applications	SC
Historic Environment		
Number of Conservation Areas at risk	Historic England	SC / W
Number of identified / loss of non-designated heritage assets Number of Listed Buildings and other Heritage Assets on the 'at risk' register	East Suffolk Council Historic England	SC / W SC / W
Number of Listed Buildings in the District	Historic England	SC (also reported for W)
Number of Registered Parks and Gardens	Historic England	SC (also reported for W)
Number and type of applications determined within former Land Settlement Association Holdings, Newbourne	Monitoring of planning applications	SC
Number and type of applications determined within the Garrett Era Area, Aldeburgh	Monitoring of planning applications	SC
Number of applications which have an impact on the natural, historic and built environment	Monitoring of planning applications	SC
Health		
Life expectancy	Office for National Statistics	Waveney Strategic Priority indicator
Participation in physical activity (Active 150+ minutes a week)	Sport England, Active Adult Lives Survey	Waveney Strategic Priority indicator
Percentage of adult and child population who are overweight or obese - Percentage of adults (18+) classified as overweight or obese	Public Health England, Public Health Profiles	Waveney Strategic Priority indicator
Percentage of adult and child population who are overweight or obese - Prevalence of excess weight among children in Year 6 (age 10-11 years)	National Child Measurement Programme	Waveney Strategic Priority indicator
Number of locations at or above any of the national Air Quality Objectives for England	Local Air Quality Management Assessments (Environmental Protection)	SC

Indicator	Data source	Local Plan
Number of nitrogen dioxide (NO <sub>2</sub> ) monitoring sites within 10% of the annual mean Air Quality Objective (sites above $36\mu g/m^3$ )	Local Air Quality Management Assessments (Environmental Protection)	SC
Wellbeing	ONS, Annual Population Survey - personal wellbeing estimates	Additional health indicator (East Suffolk)
Neighbourhood Plans		
Housing allocations in Neighbourhood Plans to meet minimum indicative requirements	Neighbourhood Plans	SC (also reported for W)
Number of 'made' Neighbourhood Plans	Neighbourhood Plans	SC / W

## Appendix 2 - Indicators not currently monitored/reported

The following table sets out the Local Plan indicators not currently monitored or reported this year. This includes a number of new indicators from the Suffolk Coastal Local Plan and monitoring processes are to be determined how best to report against the indicators. Third party data for some indicators is not available or is out of date.

Indicator	Reason not monitored/reported
<b>Employment, Retail and Leisure and Tourism</b>	n
Number and type of applications approved to support farm diversification NB indicator re-worded from: Farms operations ceased	This is a new indicator to monitor Policy SCLP4.7 Rural Diversification. The indicator name has been amended to better reflect the intent of the policy and work will be undertaken to determine how best to report against this indicator.
Expansion / creation of Shared Space and Dementia Friendly areas	This is a new indicator to monitor Policy SCLP4.10 Town Centre Environments. Work will be undertaken to determine how best to report against this indicator.
Total day trips; total staying trips; total visitor spend	The Council's commissioned report, Economic Impact of Tourism for 2020 has yet to be published.
Transport	
Traffic counts	Data not comparable to previous years due to travel restrictions throughout 2020.
<b>Community Facilities and Assets</b>	
Proportion of population with access to different types of open space	Further develop a standardised monitoring process across the whole of East Suffolk district.
Proportion of population with access to key services and facilities	Further develop a standardised monitoring process across the whole of East Suffolk district.
Climate Change	
Number of properties at risk from flooding Number of properties at risk from erosion	For these two indicators, we are not monitoring them currently, but will work with the Environment Agency to try to develop a standard approach to how best to monitor them (given the ever-changing baseline and different sources of flood risk).
Design	
Number of applications permitted of high residential amenity standards.	This is a new indicator to monitor Policy SCLP11.2 Residential Amenity. Work will be undertaken to determine how best to report against this indicator.

Indicator	Reason not monitored/reported
Number of identified non-designated heritage assets	Not monitored as present. Council investigating monitoring options.
Loss of non-designated heritage assets	Not monitored as present. Council investigating monitoring options.

## Appendix 3 - Suffolk Coastal and Waveney Local Plan **Sustainability Appraisals** indicators

#### **Suffolk Coastal Local Plan**

Suffolk Coastal SA Objective / Indicator	Outcome 2020/21	Source / Notes
To reduce poverty and social ex	kclusion	
Long term unemployment rate	No data.	
Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country	Figure is for East Suffolk, 2019 Index of Multiple Deprivation: 6.4% of East Suffolk population live in most deprived 10% Lower Super Output Areas in England (2019 population estimates 16,028/249,561)	English indices of deprivation
To meet the housing requireme	ents of the whole community	
New homes completed in the monitoring year	Net additional homes completed: 512	East Suffolk Council
	Affordable homes completed: 90 Gypsy and Traveller pitches completed: 0 Net additional bedrooms in C2 care homes: -8	More information can be found in Section 7 - Housing
New homes approved in the monitoring year	675 homes permitted of which 147 are affordable homes.	East Suffolk Council Figures include permissions permitted in previous years such as approval of reserved matters from an earlier outline consent or a renewal of consent
Recorded homeless rates	East Suffolk figure: 1,124 households assessed, 1,120 assessed as owed a duty (Apr 2020-Mar 2021)	MHCLG Homelessness statistics
Net additional dwellings – size, type, affordable	Housing completions by -Number of bedrooms: 13% 1-bed 37% 2-bed 30% 3-bed 20% 4+ bed House types:	East Suffolk Council  More information can be found in Section 7 - Housing

Suffolk Coastal SA Objective /	Outcome 2020/21	Source / Notes	
Indicator	62% House 11% Bungalow 26% Flat/Apartment 1% Mobile home Market/affordable: 511 Market 90 Affordable Affordable tenures: 62% Affordable rent 12% Shared equity 12% Shared ownership 6% Discounted market sale 8% Social rent		
To improve the health of the po	opulation overall and reduce health in	nequalities	
Condition of residents general health	46% Very good health 35% Good health 14% Fair health 4% Bad health 1% Very bad health	Census 2011 – General Health Table QS302EW	
To improve the quality of when	•		
Change in the amount of Accessible Natural Greenspace	No data.		
Level of recorded crime and anti-social behaviour	Total number of crimes, East Suffolk (Apr-20 - Mar-21): 14,264 (57.18 per 1,000 persons)	Suffolk Observatory (Home Office)	
Percentage of the district's population having access to a natural greenspace within 400 metres of their home	No data. Monitoring arrangements to be considered as part of the planned Green Infrastructure Strategy.		
Length of greenways constructed	No data. Monitoring arrangements to be considered as part of the planned Green Infrastructure Strategy.		
Hectares of accessible open space per 1,000 population	No data. Monitoring arrangements to be considered as part of the planned Green Infrastructure Strategy.		
To improve levels of education and skills in the population overall			
GCSE and equivalent results for young people	Due to the impact of the COVID-19 pandemic, most exams and assessments did not take place in 2019/20 or 2020/21. As a result of this, the government announced that it would not publish school or college level results data	GOV.UK - Find and compare schools in England	
% of working age population with NVQ level 4+ or equivalent qualification	East Suffolk figure: 36% (2020)	NOMIS, Annual Population Survey	
To conserve and enhance wate	r quality and resources		
Recorded water quality in	No data		

Suffolk Coastal SA Objective / Indicator	Outcome 2020/21	Source / Notes	
mechanisms			
To safeguard the integrity of th	e coast and estuaries		
Recorded visitor numbers on designated European sites	No data. Additional visitor surveys are an element of the RAM Strategy and will come forward in future years in accordance with the strategy.		
To conserve and enhance biodi	versity and geodiversity		
Change in the number and area of designated ecological sites	East Suffolk figure: 10 new County Wildlife Sites designated totalling 4.73ha	Natural England and Suffolk Biodiversity Information Service 8 sites were formally designated as Roadside Nature Reserves	
Recorded condition/status of designated ecological sites	No data, data for condition of SSSIs is out of date.	Natural England	
Recorded visitor numbers on designated European sites	No data. Additional visitor surveys are an element of the RAM Strategy and will come forward in future years in accordance with the strategy.		
Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance	11 approvals in total, comprising: 3 new dwellings, 5 leisure/ tourism uses 1 employment use 1 householder application 1 retrospective listed building consent.	East Suffolk Council	
Percentage of major developments generating overall biodiversity enhancement	There have been four recent applications for the creation of wildlife ponds in East Suffolk: DC/20/3593/FUL DC/20/0134/FUL, DC/21/0240/FUL, DC/21/3868/FUL	East Suffolk Council	
Hectares of biodiversity habitat delivered through strategic site allocations	None.	East Suffolk Council	
To conserve and where appropriate enhance areas and assets of historical and archaeological importance			
Change in the number of designated and non-designated heritage assets	10 new entries on Historic England's Heritage List – all First World War Memorials (Grade II). Orfordness Lighthouse (Grade II) demolished due to public safety	Historic England	
Number of heritage assets recorded as 'at risk'	18 assets listed in Historic England's Heritage at Risk Register 2021.	Historic England	
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes			
Development brought forward through regeneration projects	Progress on delivery of the Felixstowe South Seafront project	East Suffolk Council https://www.eastsuffolk.gov.uk/busin ess/regeneration-projects/	

Suffolk Coastal SA Objective /	Outcome 2020/21	Source / Notes
Indicator		
Development granted in AONB or Special Landscape Area designations	No updates to report, Special Landscape Areas are an out of date policy designation and are not included in the current Suffolk Coastal Local Plan. For information relating to development in the AONB, please see indicator below.	
Amount of new development in AONB/Heritage Coast	Housing development: Two schemes – Aldeburgh penultimate dwelling completed of a 15 dwelling scheme (on site of a former brickworks); Hollesley - 9 completions this year of a 13 dwelling scheme on a greenfield site.  Employment development: None	East Suffolk Council Housing: sites of 10 or more dwellings (or 0.5 hectares) Employment development: 1,000sqm or more (or 0.5 hectare or more)
To achieve sustainable levels of	f prosperity and growth throughout th	ne plan area
Estimated new job creation	No data.	
Net additional gains in employment land development	10,642m <sup>2</sup> (0.91ha) gains 28,138m <sup>2</sup> (0.87ha) losses -17,496m <sup>2</sup> (0.04ha) net change	East Suffolk Council Employment uses (B1 (E(g), B2 and B8) floorspace More information can be found in Section 7 - Employment
Business formation rate	East Suffolk figure: Births 915 / Deaths 860 / Active Enterprises 9,595 (2019)	ONS, Business Demography, UK
Number of businesses paying business rates	No data.	
Numbers employed by industry	See chart in Section 7 – Employment	ONS Business Register and Employment Survey
To maintain and enhance the v	itality and viability of town and retail	centres
% of A1 use class and vacant		East Suffolk Council
units in town centres	53.5% Aldeburgh 60.8% Felixstowe 54.3% Framlingham 51.1% Leiston 52.6% Saxmundham 63.1% Woodbridge  % of vacant units: 7.0% Aldeburgh 7.0% Felixstowe 7.4% Framlingham 10.2% Leiston 9.3% Saxmundham	Surveys undertaken May 2021. Further information can be found in Section 7 Retail and Leisure
To encourage efficient patterns	8.9% Woodbridge sof movement, promote sustainable t	ravel of transport and ensure good
access to services	, p. eeu	
Loss of key services	No data and identified as an area where further work is needed.	

Suffolk Coastal SA Objective / Indicator	Outcome 2020/21	Source / Notes
Provision of key infrastructure projects	See Nationally Significant Infrastructure Projects/Delivery of Site Allocations in Section 7.	See Nationally Significant Infrastructure Projects/Delivery of Site Allocations in Section 7
Travel to work distances	Average distance (km) 17.2km % travelling less than 5km 30.8%	Census 2011
Travel to work modes	Sustainable modes: 19% Non-sustainable modes: 73% Working mainly at home 8%	Census 2011
To ensure that the digital infrastructure available meets the needs of current and future generations		
Average Broadband speeds	No data, but further information on Broadband connectivity across Suffolk is available from Better Broadband Suffolk.	https://www.betterbroadbandsuffolk .com/

#### **Waveney Local Plan**

Waveney SA Objective /	Outcome 2020/21	Source / Notes	
Indicator			
To improve the health and well-being of the population			
Proportion of journeys to work on foot or by cycle	Sustainable modes: 21.6% 73.3% Non-sustainable modes 5.1% Working mainly at home	Census 2011	
Percentage of population completing 3x30 minutes physical activity per week	East Suffolk figure: 65% of adults 16+ active an average of 150+ minutes a week Results show a significant increase of adults active 150+ minutes a week and a significant decrease in those fairly active (30-149 minutes) and no change in those inactive (less than 30 minutes)	Sport England, Active Adult Lives Survey NB covers the first eight months of coronavirus (Covid-19) restrictions, from mid-March to mid November 2020.	
Obesity in the population	East Suffolk figure: 63.5% - percentage of adults (aged 18+) classified as overweight or obese	Public Health England, Public Health Profiles	
Life expectancy	East Suffolk figure: Females: 83.83 years Males: 80.38 years	ONS, Life expectancy at birth (age <1), 20182020	
To improve access to key services and facilities			
Accessibility to key services and facilities e.g. primary school, supermarket/food shop, post office, public house, meeting place and GP surgery	No data and identified as an area where further work is needed.		
To meet the housing requirements of the whole community			
Amount and type of new housing, including extra	Net additional homes completed: 201	East Suffolk Council	
care/sheltered housing and number of care/nursing home	Affordable homes completed: 42 Gypsy and Traveller pitches	More information can be found in Section 7 - Housing	

Wayanay SA Objective	Outcome 2020/21	Source / Notes
Waveney SA Objective / Indicator	Outcome 2020/21	Source / Notes
beds	completed: 0 Net additional bedrooms in C2 care homes: 9	
To conserve natural resources		
Number and percentage of dwellings completed on previously developed land	29% (59 of 201)	East Suffolk Council
Area of high grade agricultural land lost to housing and economic development	None.	East Suffolk Council Housing: sites of 10 or more dwellings (or 0.5 hectares) Employment development: 1,000sqm or more (or 1 hectare or more)
To achieve sustained and resili	ent economic growth	
Amount and type of employment (B1, B2 and B8), retail and leisure development (A1-A5 and D2)	Employment development: 5,696m² (0.72ha) gains 6,178m² (1.33ha) losses -482m² (0.61ha) net additional Retail and leisure development: 1,160m² gains 2,961m² losses -1,801m² net additional	East Suffolk Council Employment development: B1/E(g), B2 and B8  Retail and leisure development: A1/E9a), A2/E(c), A3/E(b), A4/SG, A5/SG, D2 (various)
Jobs density	East Suffolk figure: 0.79	ONS, Jobs density
Employment by occupation	see chart in Section 7 - Employment	ONS, Annual Population Survey
Employee jobs by industry	See chart in Section 7 - Employment	ONS, Business Register and Employment Survey
To enhance the rural economy		
Employment uses (B1, B2 and B8) completed in the rural areas	110m² gains No losses 110m² net additional Two schemes for business offices (E(g)(i)) in Holton and Lowestoft	East Suffolk Council Employment uses (B1 (E(g), B2 and B8) floorspace Rural areas defined as outside of Settlement boundaries (WLP1.2), existing employment areas (WLP8.12) and employment allocations
Amount and type of new housing, including extra care/sheltered housing and number of care/nursing home beds within the rural areas	Net additional homes completed by settlement: Lowestoft: 115 Beccles and Worlingham: 19 Bungay: 3 Halesworth and Holton: 54 Southwold and Reydon: 0 Larger villages: 2 (Kessingland, Wangford with Henham) Smaller villages: 8 (Brampton, Ringsfield, Rumburgh) Countryside: 0  Affordable homes completed by settlement: Lowestoft: 3 Beccles and Worlingham: 0 Bungay: 0 Halesworth and Holton: 0	East Suffolk Council  More information can be found in Section 7 - Housing

Waveney SA Objective / Indicator	Outcome 2020/21	Source / Notes
	Southwold and Reydon: 0 Larger villages: 0 Smaller villages: 6 (Brampton) Countryside: 0	
	Bedrooms in care homes: Lowestoft: 9	

# Appendix 4 - Glossary

#### **Adoption**

The final confirmation of a Local Plan/Development Plan or Local Development Document status by a Local Planning Authority (LPA).

#### Affordable housing

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. The full definition of affordable housing is contained in the National Planning Policy Framework <a href="www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary">www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary</a>. The Government also introduced First Homes as an affordable tenure in May 2021 <a href="https://www.gov.uk/guidance/first-homes">https://www.gov.uk/guidance/first-homes</a>.

#### **Affordable Rent**

A tenancy offered at up to 80% of market rent levels within the local area.

#### **Air Quality Management Areas**

Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

#### **Allocation**

Designation of land in the Plan for a particular use, i.e. industrial land.

#### **Area of Outstanding Natural Beauty (AONB)**

An area designated at a national level because of its outstanding landscape quality.

#### **Authority Monitoring Report**

Local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports any activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan are progressing.

#### **Biodiversity**

The variety of plant and animal species, plus the groups of species which make up particular habitats. These help maintain a balanced environment at all levels, from local to global.

#### **BREEAM**

BRE Environmental Assessment Method' is a sustainability assessment method for new buildings and infrastructure, designed to help use natural resources more efficiently. www.breeam.com/.

#### (The) Broads Authority Area

The Norfolk and Suffolk Broads is Britain's largest protected wetland and third largest inland waterway. This area is equivalent in status to a National Park. Under the Norfolk and Suffolk Broads

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Act 1998 the Broads Authority is the Local Planning Authority for the area. Its remit is to protect the natural beauty and promote public enjoyment of the area, as well as protecting navigation interests.

#### **Brownfield Site**

See previously developed land.

#### **Building for Life 12**

Building for Life 12 was updated and superseded in June 2020 by Building for a Healthy Life. Building for a Healthy Life is a set of design criteria which can be used to assess the quality of design of a development proposal. www.udg.org.uk/publications/othermanuals/building-healthy-life.

#### **Coastal Change Management Area (CCMA)**

An area defined where coastal change is likely to occur over the next 100 years (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).

#### **Community Facilities**

Facilities and uses generally available to and used by the local community at large for the purposes of leisure, social interaction, health and well-being or learning. This will include, but not be confined to, community centres, public houses, sports venues, cultural buildings, places of worship, medical facilities, shops, post offices, libraries, schools and other training and educational facilities.

#### **Community Infrastructure Levy (CIL)**

This is a standard fee that is applied to new development to pay for infrastructure that supports new development within the District. www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/

#### **Conservation Area**

An area that is considered worthy of protection because of its architectural and historic interest.

#### **Conservation Area Appraisal**

A detailed study of the streets and buildings in a conservation area.

#### **Development Plan**

The Development Plan for an area is a suite of Local Plan and Neighbourhood Plan documents for a local planning authority area, setting out the policies and proposals for the development and use of land and buildings. It includes Minerals and Waste Local Plan documents prepared by Suffolk County Council. It is the starting point for the determination of planning applications.

#### **Development Plan Document (DPD)**

A Local Development Document that has development plan status and is subject to community involvement and independent examination. It outlines the key development goals of a Local Plan or Neighbourhood Plan.

#### **Evidence Base**

The information and data gathered by local authorities to justify the "soundness" of the policy

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approach set out in Local Development Documents, including physical, economic, and social characteristics of an area.

#### **Functional Economic Area**

A spatial area which functions on its own as an economic entity.

#### **Green Infrastructure**

A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

#### **Green Space**

A natural or manmade space containing plants or grassland. This can include parks, woodlands, playing fields, areas of grassland and areas of biodiversity value.

#### **Heritage Assets**

An overarching term that refers to buildings, parks and gardens, monuments and archaeological remains that are of historic or archaeological value.

#### **Historic Environment**

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

#### **Housing Market Area**

A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

#### **Gypsies and Travellers**

Gypsies are defined in national planning policy as 'persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such'.

#### **Listed Building**

A building that is recognised and statutorily protected for its historic and architectural value. www.historicengland.org.uk/listing.

#### **Local Development Scheme**

Sets out a programme for the preparation of a Local Plan. It is a project management document which identifies which documents are to be prepared, the stages that have to be achieved and a detailed timetable.

#### Masterplan

A detailed plan which provides a template for the development of a site or area.

#### **National Planning Policy Framework**

Most national planning policy is contained within the National Planning Policy Framework. Some policy is also contained within ministerial statements. National planning policy is supported by the National Planning Practice Guidance which gives further detail on how national policy should be implemented and interpreted.

#### **Neighbourhood Plans**

Neighbourhood planning is a right for communities introduced through the Localism Act 2011. Communities can shape development in their areas through the production of Neighbourhood Plans. The local parish or town council lead on neighbourhood planning in their areas. Where one does not exist then a community group known as a neighbourhood forum needs to be established to lead. Neighbourhood Plans become part of the Development Plan for the area and the policies contained within them are then used in the determination of planning applications.

#### **Non-designated Heritage Assets**

A heritage asset that has not been included on any national list.

#### **Objectively Assessed Need**

An assessment of the amount of new housing, jobs, employment land, retail floorspace and other uses that are likely to be needed within the District.

#### **Open Space**

A range of different sites and areas, including wildlife areas, natural greenspace, parks and gardens, amenity greenspace, play space, allotments, cemeteries and churchyards and green corridors.

#### **Outline Planning Permission**

A permission granted at the early stage of a development to state that a proposal is acceptable in principle before any detailed design issues are considered.

#### **Planning Obligations and Agreements**

A legal agreement between a planning authority and a developer ensuring that certain extra works related to a development are undertaken or contributions made to the provision of infrastructure or facilities. Sometimes called a Section 106 (S106) Agreement.

#### **Previously Developed Land**

Land which has been previously developed but is now largely vacant or disused. Previously developed land is defined in the National Planning Policy Framework.

www.gov.uk/government/publications/national-planning-policy-framework--2.

#### **Ramsar Sites**

A term adopted following an international conference, held in 1971 in Ramsar in Iran, to identify wetland sites of international importance.

#### **Renewable Energy**

This includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

#### **Section 106 Agreement**

See Planning Obligations and Agreements.

#### Self Build / Custom Build

This refers to where someone organises the design and build of their own home.

#### **Settlement Boundaries**

Lines around settlements which dictate in principle where some types of development can take place.

#### **Sites of Special Scientific Interest**

Have statutory protection as the best examples of the UK's flora, fauna, or geological or physiographical features. They may have other national and international nature conservation designations. Most SSSIs are privately owned or managed, while others are owned or managed by public bodies or non-government organisations.

#### **Social Rent**

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

#### Special Area of Conservation (SAC)

This is an area designated under the European Habitats Directive to give special protection to plants, animals and habitats.

#### **Special Protection Area (SPA)**

This is an area identified as being of value for the feeding, breeding, migrating and wintering of threatened bird species. These sites are identified under the European Wild Birds Directive and receive enhanced protection.

#### **Strategic Housing Market Assessment**

An assessment of housing need and demand within the District.

#### **Supplementary Planning Documents**

A planning document that provides practical guidance to assist in the implementation of Local Plan policies.

#### **Town Centre Uses**

These are use classes that are located within or adjacent to town centres. They include: retail (E(a)); financial and professional (E(c); restaurants and cafés (E(b)); drinking establishments (*sui generis*); hot food takeaway (*sui generis*); leisure (*sui generis* - concert halls; bingo halls; dance halls).

#### **Transport Assessment**

A comprehensive and systematic process that sets out various transport issues relating to a proposed development. It identifies what measures will be taken to deal with the anticipated transport impacts of the scheme in relation to all forms of travel.

#### **Transport Statement**

A simplified Transport Assessment, used in some cases where transport issues arising out of development proposals may not require a full Transport Assessment i.e. smaller scale developments where the traffic impact is limited in both volume and area impact.

#### **Travel Plan**

A long term management strategy document for a development that seeks to provide sustainable transport and is subject to regular review.

#### **Use Classes Order**

Different categories of uses identified in the planning system by the Use Class Order (1987 as amended) <a href="https://www.planningportal.co.uk/info/200130/common projects/9/change of use">www.planningportal.co.uk/info/200130/common projects/9/change of use</a>.



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# STRATEGIC PLANNING COMMITTEE Monday, 13 December 2021

Subject	Planning Policy and Delivery Update
Report of	Councillor David Ritchie  Cabinet Member with responsibility for Planning and Coastal  Management
Supporting Officer	Desi Reed Planning Policy and Delivery Manager desi.reed@eastsuffolk.gov.uk 01502 523055

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

### Purpose and high-level overview

#### **Purpose of Report:**

This report provides an update on key elements of the current work programme, including preparing Supplementary Planning Documents (SPDs), strategies on specific topics such as cycling and walking, the delivery of infrastructure to support growth through CIL collection and spend, Neighbourhood Plans and housing delivery.

### **Options:**

This report is for information only.

#### Recommendation/s:

That the content of the report be noted.

### **Corporate Impact Assessment**

#### **Governance:**

The Local Plan Working Group oversee the preparation of many of the documents referred to in this report.

#### ESC policies and strategies that directly apply to the proposal:

A range of Local Plan policies for East Suffolk.

#### **Environmental:**

No impact.

#### **Equalities and Diversity:**

This report is for information only, so no equality impact assessment is required. However, undertaking an assessment is an integral element for most of the projects in the work programme.

#### Financial:

The work of the Team is undertaken within existing budgets, with grant income generated through support provided on Neighbourhood Planning.

#### **Human Resources:**

No impact.

#### ICT:

No impact.

#### Legal:

No impact.

#### Risk:

The Policy and Delivery Team are fully staffed but the work programme is significant and crucial to the delivery of many aspects of the Strategic Plan. There is an acknowledgment that staff capacity, not just in the Planning Service, is on occasions stretched and with the work programme being important to the council discussions are taking place with senior officers and the Cabinet Member to ensure we have a resilient and quality team to deliver on our objectives.

External Consultees: None

## **Strategic Plan Priorities**

Select the priorities of the <b>Strategic Plan</b> which are supported by this proposal:			Secondary
_	ct only one primary and as many secondary as appropriate)	priority	priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	×	
P02	Attract and stimulate inward investment		
P03	Maximise and grow the unique selling points of East Suffolk		×
P04	Business partnerships		
P05	Support and deliver infrastructure		$\boxtimes$
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most		×
P08	Maximising health, well-being and safety in our District		×
P09	Community Pride		×
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		$\boxtimes$
P14	Review service delivery with partners		
T04	Delivering Digital Transformation	L	
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		$\boxtimes$
P18	Skills and training		
P19	District-wide digital infrastructure		
T05	Caring for our Environment		
P20	Lead by example		$\boxtimes$
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		$\boxtimes$
P23	Protection, education and influence		$\boxtimes$
XXX	Governance	L	
XXX	How ESC governs itself as an authority		
	does this proposal support the priorities selected?		
	Planning Policy and Delivery work programme makes a significar	nt contribu	tion to the
	ery of the Strategic Plan, cutting across all 5 themes. The primar		
	ndary priorities identified reflect the wide range of projects in th		
	orimary priority of building the right environment for East Suffol	•	J
underpinned by having up to date Local Plan coverage for the whole District, with the			
secondary priorities reflecting the delivery of the Local Plans through the current work			
programme. The Authority Monitoring Report provides an important role in reporting on			
progress in delivering the Local Plans.			
For example, the preparation of the Affordable Housing Supplementary Planning			
Document (SPD) and development briefs support the Economy theme including the			

delivery of the right supply of housing (P01) and maximising the unique selling points of

the district (P03). The preparation of the Community Infrastructure Levy (CIL) Charging Schedule, collection and spend of CIL also support the Economy theme, through investment in the district for healthy and sustainable economic growth (P01 and P05).

The support for Neighbourhood Planning, the Affordable Housing SPD and the Cycling and Walking Strategy all support the Enabling Communities theme, including taking positive action on what matters most (P07), community pride through a shared sense of purpose (P09) and maximising health and well-being (P08). The Health Environments SPD will also support the latter priority (P08).

The Sustainable Construction SPD will support the Caring for our Environment theme. It supports all 4 priorities of leading by example (P20), encouraging the reuse of materials (P21), supporting the growth of renewable energy (P22) and protecting, educating and influencing care for our environment (P23). The Cycling and Walking Strategy also has a key role to play in protecting our natural environment (P23).

### **Background and Justification for Recommendation**

1	Background facts
1.1	This report provides an update on the current work programme including progress being made on the preparation of Neighbourhood Plans and housing delivery.  With full and up to date Local Plan coverage for the whole District, the focus of the work of the Planning Policy and Delivery Team is primarily on the delivery of these plans.
1.2	There are a number of key projects in the current work programme (next 12 months) that support the delivery of the Local Plans and the East Suffolk Strategic Plan. These focus on providing guidance to support the implementation of planning policies through Supplementary Planning Documents (SPDs) including development briefs, strategies on specific topics such as cycling and walking, and projects that support the delivery of infrastructure to support growth through CIL collection and spend. The team also support a wide range of external projects plus corporate and regeneration projects across the District that are not reported to this committee.

2	Current position
2.1	Since the last report to the Strategic Planning Committee 5 <sup>th</sup> October 2021 the following key milestones have been met:
2.2	<ul> <li>With respect to Neighbourhood Plans:         <ul> <li>Beccles Neighbourhood Plan – This was 'made' by the Council on 22<sup>nd</sup> September and now carries full weight in decision making.</li> <li>Bungay Neighbourhood Plan - Completed their Regulation 14 presubmission consultation (i.e. draft plan consultation led by the NP group) on 5<sup>th</sup> November. They will now consider any changes needed before formally submitting the plan to the Council.</li> <li>Halesworth Neighbourhood Plan – Regulation 14 pre-submission consultation commenced on 5<sup>th</sup> November and will conclude on 17<sup>th</sup> December.</li> <li>Lound with Ashby, Herringfleet and Somerleyton NP – Examination of the plan by an independent Examiner began on 27<sup>th</sup> October and is expected to conclude in December.</li> </ul> </li> </ul>

Oulton Neighbourhood Plan - Regulation 14 pre-submission consultation concluded on 26th November. Rushmere St Andrew NP – Regulation 14 pre-submission consultation concluded on 1st November. Saxmundham Neighbourhood Plan – Regulation 14 pre-submission consultation began on 1<sup>st</sup> November and concludes on 22<sup>nd</sup> December. Southwold NP – Examination of the plan ended on 20<sup>th</sup> October. The Examiner recommended that, subject to modifications, the plan proceeds to referendum. The Council issued its Decision Statement responding to the Examiner's recommendations on 17<sup>th</sup> November. Guidance on reviewing 'made' neighbourhood plans has been published on the Council's website. Consultation on the draft Sustainable Construction Supplementary Planning 2.3 **Document** commenced on 1 November. Consultation on the draft Affordable Housing Supplementary Planning Document 2.4 commenced on 1 November. 2.5 Consultation on the draft Cycling and Walking Strategy commenced on 1 November. 2.6 Consultation on the draft Community Infrastructure Levy Charging Schedule for East Suffolk commenced on 11 November. 2.7 The annual Authority Monitoring Report, reporting on progress on delivering the Local Plans, is being reported as a separate item on this Strategic Planning Committee agenda, including a presentation. 2.8 The 5 year Housing Land Supply Statement for the period 1 April 2021 to 31 March 2026 was completed and published in October. 6.52 years supply for the Suffolk Coastal Local Plan area of East Suffolk and 5.74 years supply for the Waveney Local Plan area of East Suffolk. (A short presentation on the land supply position is being made at this meeting as part of the above Annual Monitoring Report item) 2.9 **CIL Collection and Spend:** For the first 6 months of 2021-22 we received just over £3m in total CIL. The volume of CIL chargeable development continues to increase. Neighbourhood CIL (NCIL) payments for October 2021, for the period 1 April to 30 September, were assessed and issued to the relevant Parish Councils by 28 October 2021. The sum allocated was £488K. CIL reporting » East Suffolk Council A report summarising the position of CIL funded infrastructure projects and their delivery status can be downloaded from the CIL Spending webpage see link to this report District-CIL-infrastructure-projects-2020-21.pdf 2.10 Housing Delivery - The annual combined Local Plan anticipated housing delivery figure is 916 dwellings. For the first 6 months of this year (April to Sept) 255 dwellings have been delivered, of which 101 were affordable. At the end of September there were 1073 dwellings under construction so the slow start to the year is expected to pick up. The picture moving forward remains optimistic, given that Local Plan site allocations, including many of the major sites, are either under discussion with Planning Officers, undergoing developer/landowner led community consultation, are current planning applications or have already been consented.

3	How to address current situation		
3.1	During the next 3/4 months, some of the key project milestones will include:		
3.2	<ul> <li>With respect to Neighbourhood Plans:         <ul> <li>Lound with Ashby, Herringfleet and Somerleyton NP – a referendum is expected in spring 2022.</li> <li>Southwold Neighbourhood Plan – a referendum is expected early in 2022.</li> <li>Wickham Market - Regulation 14 consultation carried out in Spring 2019, and now working towards Submission of the Final Draft to the Council.</li> <li>Guidance for neighbourhood plan groups on delivering new housing</li> </ul> </li> </ul>		
	through their plans will be published in spring 2022.		
3.3	Consultation on the <b>draft Sustainable Construction Supplementary Planning Document</b> will have ended on 13 December. All responses to the consultation will have been considered and a final version of the document prepared and presented to Cabinet for adoption.		
3.4	Consultation on the <b>draft Affordable Housing Supplementary Planning Document</b> will have ended on 13 December. All responses to the consultation will have been considered and a final version of the document prepared and presented to Cabinet for adoption.		
3.5	Consultation on the <b>draft Cycling and Walking Strategy</b> will have ended on 10 January 2022. All responses to the consultation will then be considered and subject to the number of responses received a final version of the strategy will have been prepared and presented to Cabinet for adoption in late spring.		
3.6	Consultation on the <b>draft Community Infrastructure Levy Charging Schedule</b> for East Suffolk will have ended on 23 December. Following consideration of all the responses the Charging Schedule will have been submitted to an Examiner for independent scrutiny to commence.		
3.7	Work will have progressed on <b>development briefs</b> for sites allocated for housing in the Local Plans.		
3.8	Work will have progressed on preparing a draft Healthy Environments Supplementary Planning Document.		
3.9	Work will have commenced on preparing a Supplementary Planning Document to provide additional guidance on the implementation of the Housing in Clusters in the Countryside (SCLP5.4) and Small Scale Residential Development in the Countryside (WLP8.7) polices of the Local Plans.		
3.10	The <b>Exacom data transparency project</b> (relating to the management of CIL, Section 106 and RAMS payments) continues to make steady progress with 35% of s106 agreements loaded into the system. The system is about to have a major technical update for all areas which will also go towards improving the way the data will be presented in the future once the project is completed and able to switch to live mode.		
3.11	Housing Delivery - The East Suffolk Housing Action Plan was published in August 2021 and reports on issues facing the development sector and progress in implementing actions to support the delivery of housing. One of the key issues that continues to affect the sector is the shortage and cost of building materials, in particular timber, steel, pitched roofing, plastics, paints and cement. The Major Sites team continue to support and steer master-planning work on key sites across the District, including North of Lowestoft, Beccles/Worlingham, South Saxmundham and North Felixstowe; with master-planning being a key policy driver to provide certainty and a coordinated approach to delivery.		
3.12	Planning White Paper update – Members will recall that the Planning White Paper, that posed some fundamental changes to the planning system, was		

published for consultation last year. The analysis of the consultation response was expected this autumn, to be shortly followed by a new Planning Bill. Both are still awaited.

### 4 Reason/s for recommendation

4.1 This report is for information only.

# **Appendices**

### **Appendices:**

None

### **Background reference papers:**

None



# STRATEGIC PLANNING COMMITTEE Monday, 13 December 2021

Subject	ENFORCEMENT PERFORMANCE REPORT – JULY TO SEPTEMBER 2021	
Report by	Councillor David Ritchie	
	Cabinet Member with responsibility for Planning and Coastal Management	
Supporting Officer	Cate Buck	
	Senior Planning & Enforcement Officer	
	<u>Cate.buck@eastsuffolk</u> .gov.uk	
	01394 444290	

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

## Purpose and high-level overview

# **Purpose of Report:** To provide information on the performance of the enforcement section of the Development Management Team. **Options:** Not applicable. Recommendation/s: That the content of the report be noted **Corporate Impact Assessment Governance:** Not applicable ESC policies and strategies that directly apply to the proposal: East Suffolk Council Enforcement Policy **Environmental:** Not applicable **Equalities and Diversity:** Not applicable Financial: Not applicable **Human Resources:** Not applicable ICT: Not applicable Legal: Not applicable Risk: Not applicable **External Consultees:** None

# **Strategic Plan Priorities**

Select the priorities of the <u>Strategic Plan</u> which are supported by this proposal:  (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk		$\boxtimes$
P02	Attract and stimulate inward investment		
P03	Maximise and grow the unique selling points of East Suffolk		
P04	Business partnerships		
P05	Support and deliver infrastructure		
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most	$\boxtimes$	
P08	Maximising health, well-being and safety in our District		
P09	Community Pride		$\boxtimes$
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
T04	Delivering Digital Transformation		
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		
P18	Skills and training		
P19	District-wide digital infrastructure		
T05	Caring for our Environment		
P20	Lead by example		$\boxtimes$
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		
P23	Protection, education and influence		
XXX	Governance		
XXX	How ESC governs itself as an authority		$\boxtimes$
How does this proposal support the priorities selected?  To provide information on the performance of the enforcement section			

# **Background and Justification for Recommendation**

1	Background facts
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.
1.2	Between July and September, no enforcement notices were served.

### 2 Current position

### 2.1 Cases Received and Closed July to Sept 2021

Month	Cases Received	Cases Closed
July	37	37
August	41	45
September	49	84

<sup>\*</sup>Please note all new complaints are logged, site visited and then triaged in accord with the appropriate risk assessment.

### 2.2 Reasons for Closure

Reason	<u>July</u>	August	<u>Sept</u>
No Breach	13	23	62
Compliance/use	6	9	2
ceased			
Planning	13	10	18
Permission			
Granted			
Permitted	3	2	1
Development			
Immune/Lawful	2	0	0
Duplicate file	0	1	1
Withdrawn	0	0	0
Not Expedient	0	0	0

### 2.3 <u>Time taken to close cases</u>

Time taken to	Cases Closed in	Cases Closed in	<b>Cases Closed in</b>
close cases	<u>July</u>	Aug	<u>Sept</u>
1-10 days	5	4	7
11-20 days	4	5	6
21-30 days	2	1	0
31-40 days	0	6	1
41 + Days	26	29	70

	<u>Total</u>	37	45	84	
2.4	Enforcement I	Notices Served July 1	to September 2021		
	Type of Notice	Address	<u>Breach</u>	<u>Compliance</u> <u>period</u>	
	NIL	NIL	NIL	NIL	

3	How to address current situation
3.1	Quarterly monitoring

4	Reason/s for recommendation
4.1	That the report concerning Enforcement Team statistics be received.

# **Appendices**

Appendices:	
None	

# Background reference papers: None



# STRATEGIC PLANNING COMMITTEE Monday, 13 December 2021

Subject	PLANNING PERFORMANCE REPORT – JULY TO SEPTEMBER 2021
Report of	Councillor David Ritchie
	Cabinet Member with responsibility for Planning and Coastal Management
Supporting	Ben Woolnough
Officer	Planning Manager (Development Management)
	01394 444593
	Ben.woolnough@eastsuffolk.gov.uk

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

### Purpose and high-level overview

rui pose and mgn-level overview
Purpose of Report:
This report provides an update on the planning performance of the Development Management Team in terms of the timescales for determining planning applications.
Options:
Not applicable.
Recommendation/s:
That the content of the report be noted
Corporate Impact Assessment
Governance:
Not applicable
ESC policies and strategies that directly apply to the proposal:
Not applicable
Environmental:
Not applicable
Equalities and Diversity:
Not applicable
Financial:
Not applicable
Human Resources:
Not applicable
ICT:
Not applicable
Legal:
Not applicable
Risk:
Not applicable
External Consultees: None

# **Strategic Plan Priorities**

Select the priorities of the <u>Strategic Plan</u> which are supported by this proposal:			Secondary priorities
(Sele	ct only one primary and as many secondary as appropriate)	priority	priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	☒	
P02	Attract and stimulate inward investment		×
P03	Maximise and grow the unique selling points of East Suffolk		×
P04	Business partnerships		
P05	Support and deliver infrastructure		$\boxtimes$
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most		$\boxtimes$
P08	Maximising health, well-being and safety in our District		
P09	Community Pride		×
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		$\boxtimes$
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
T04	Delivering Digital Transformation		
P15	Digital by default		×
P16	Lean and efficient streamlined services		×
P17	Effective use of data		×
P18	Skills and training		×
P19	District-wide digital infrastructure		×
T05	Caring for our Environment		
P20	Lead by example		$\boxtimes$
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		
P23	Protection, education and influence		
XXX	Governance		
XXX	How ESC governs itself as an authority		$\boxtimes$
How	does this proposal support the priorities selected?		
To pr	To provide information on the performance of the enforcement section.		

### **Background and Justification for Recommendation**

1	Background facts
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 Current position

The breakdown for Q2 (July 2021 to September 2021) compared with the previous quarter (Q1) is reported as follows:

	Current C	Current Quarter		Previous Quarter	
	Q2 Percentage	Q2 Total	Q1 Percentage	Q1 Total	Targets
Major Development	63.6%	7/11	64.29%	9/14	60% national
					65% stretched
Minor Development	75.7%	103/136	72%	92/127	65% national
					75% stretched
Other Development	84.6%	474/560	76%	446/586	80% national
					90% stretched

The figures for Q2 of the financial year shows a continued high number of application submissions, particularly for other development, at 560 submissions. There remains a trend to issue decisions in a timely manner and the national performance indicators have been met for all categories. The slight underperformance last quarter in respect of other developments has been made up for by now exceeding the national target at 84.6%. As previously reported work is progressing to make decision making more efficient, particularly for more straightforward decisions without public interest.

2.3	All members of the Development Management Team largely continue to work
	from home but undertake site visits in a Covid secure manner. All office meetings
	with customers have been held virtually though site meetings are now taking place
	and the figures presented to Members demonstrates that the pandemic has not
	had a significant negative effect on either the quality of timeliness of decision
	making albeit there are a number of challenges which have been faced.
2.4	The Development Management Team have also been appropriately using the
	extension of time mechanism to ensure that appropriate discussions can take
	place with applicants/other parties to secure high quality sustainable
	developments.
2.5	The Council maintains a high approval rate across all types of applications and
2.3	proactively look to support development where policy permits and work
	proactively with applicants and agents to secure appropriate schemes.
2.6	
2.0	Where applications are refused Officers seek to defend those refusals robustly.  Members will note the separate appeals report on the agenda which
	demonstrates confidence that applications are being refused correctly and those
	decisions are for the most part upheld at appeal.
2.7	Officers continue to work proactively with agents to promote the pre-application
2.,	service to seek 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. The Planning Manager is currently engaging with a
	range of agents to understand their needs and expectations of the team to factor
	into further improvements. Unfortunately, in order to accommodate the
	considerable increase in planning applications and maintain decision making
	targets, the pre-application service has suffered in terms of quality of service. This
	is a short term effect which has been covered in a recent Planning Newsletter.
2.8	For information purposes an update on Strategic/Major Sites is also provided as
	Appendix A of this report. It is proposed that such an update will be provided
	twice a year for Strategic Planning Committee.
·	

3	How to address current situation
3 1	Quarterly monitoring

4	Reason/s for recommendation
4.1	That the report concerning the performance of the Development Management
	Team in terms of the speed of determining planning applications be noted.

# **Appendices**

Appe	ndice	s:
, 'bbc	110100	٠.

**Appendix A** Strategic/Major Sites update – Major Sites and Infrastructure Team

# Background reference papers:

None.

#### Appendix A.

#### Strategic/Major Sites update - Major Sites and Infrastructure Team

#### **Summaries of recent progress:**

#### North of Lowestoft Garden Neighbourhood WLP2.13

This site for 1300 homes remains in the masterplan evolution period between two developer-led masterplan consultations. Previously a consultation commenced in January 2021 and we anticipate a second stage consultation on the masterplan in early 2022. Continued work is taking place with Suffolk County Council as the landowner developer around key technical considerations and masterplan design. Their ongoing engagement with Officers and the community has presented some key themes to address including the amount of employment land to be included in the Masterplan, vehicular accesses and traffic and odour from the Sewage Treatment Works.

#### Woods Meadow, Oulton DC/01/0977/OUT

This site is a longstanding consent being built out at a rate of just over 100 homes per year. It includes a completed primary school and a Country Park which has been transferred to East Suffolk as a Council owned open space. Recent updates are provided below:

#### Community Centre

Site meeting taking place on 2 Dec to discuss the community centre proposal, to which Persimmon are attending. Project plan will be drawn up from this visit.

- Persimmon Homes are required to provide a serviced site and ESC has S106 monies towards the construction of a Community Centre, along with a Neighbourhood Equipped Area of play (NEAP), adjacent to the country park, east of the school drop off/country park car park.
- Initial Officer discussions have determined that a concept scheme for the community centre should be drawn up in the first instance, to determine what might be possible.
- A new recruit to the Assets Team will be taking the community centre site forward.
- There has been interest from the local church to run the centre and a site meeting has been arranged to discuss this further.
- Local residents have complained about the vehicle access created in the form of a drop kerb by Persimmon.
- Persimmon want to discuss the opportunity to move this access through the car park instead. This will be discussed at the site meeting.
- The Active Communities Officer has consulted with the Limes Primary on an initial basis to get an idea of what equipment they would like to see on the NEAP
- However, the placing of the NEAP and community centre has not been formalised, nor do ESC currently own the land, which is in Persimmon ownership still.
- The school drop off/country park car park will be transferred to ESC once the road is adopted (so technically it still belongs to Persimmon).

#### Adoption of open spaces

Persimmon / Oldman and Warnes Homes have a series of open spaces they would like the Council to adopt in Phases 1 and 2. This includes 2 SuDS areas (drainage basins). Persimmon were asked to provide external specialist advice on the SuDS and a maintenance plan for the next 15 years. This has not yet been forthcoming, due to a change in personnel. However, it will be discussed at the meeting on the 2 Dec.

#### New woodland

Norse are working with the Woodland Trust to plant 12 acres of new woodland on the site. This requires further permissions from the Forestry Commission. It was hoped the trees would arrive this year, but this has now been delayed.

#### Horse Riders

There has been a report of complaints to Oulton Parish Council from the Horse Riding fraternity in camps heath. The Country park Warden will be aware of these complaints as part of the day to day management of the site. It has been suggested that ESC apply to Natural England for an Open Space dedication for the Country Park. This would highlight areas where horse riding would be permissible.

#### Phase 3

Officers understand that Persimmon Homes are now considering development of Phase 3. A critical aspect of this Phase that remains to be resolved will be the known contamination issues on the former Fat and Bone Factory.

#### Mobbs Way Footpath upgrade to bridleway by SCC

This is a S106 project by SCC at Gorleston Road along top of Blackberry Way (its boundary of Mobbs Way Business Park) towards the balancing pond in Oulton. A bridleway is being created on the existing footpath. SCC will draft the agreement which involves both ESC and Persimmon to sign. Norse have undertaken some tree works to the pathway and SCC will carry out the works, at the end of which it comes into operation. ESC will agree to the proposal, once the paperwork is sent through.

#### Kirkley Waterfront and Sustainable Urban Neighbourhood WLP2.4

This is a brownfield land regeneration project for approximately 1,380 dwellings and 7.5 hectares of employment. No planning progress has taken place this year but discussions have been ongoing in respect of the Council's role in aiding the delivery of this wider site and our continued engagement with landowners. A strong relationship has been formed with Homes England, the Government body who have various avenues of support for the delivery of homes on brownfield sites like this. We very much hope that they will play a key role in how the sites are delivered. In addition, with the construction of The Gullwing, the new access road of Waveney Drive is under construction running through the 'Jeld Wen' site. This road will connect through to Riverside but importantly it will deliver major infrastructure in opening up the employment and housing land on that site taking one considerable cost away from the future developer.

#### Land South of The Street, Carlton Colville WLP2.16

This is allocated for approximately 900 homes. Carlton Colville Town Council's Neighbourhood Plan group are preparing a draft neighbourhood plan with a strong focus on achieving high quality design and connectivity on this site. We have been working closely with that group to help steer how that may be effectively done through the neighbourhood plan process. It is anticipated that there will be a consultation on this next year providing a unique community-led approach to influencing future masterplanning. No developer interest in the site has yet been seen.

#### **Beccles and Worlingham Garden Neighbourhood WLP3.1**

This site is allocated for 1,250 homes. Discussions have continued this year to support landowner collaboration in achieving a site wider masterplan with future community engagement informing it. More recently a meeting took place between East Suffolk Officers and Beccles Town Council, Worlingham Parish Council and Ringsfield and Weston Parish Council to ensure that the wider community have received updates on the efforts of East Suffolk in supporting a well-planned delivery of the site. Further to this, work has been taking place in the appraisal of up-to-date environmental information to inform an Environmental Impact Assessment (EIA) screening process. This process will help to underpin the evidence required in any masterplan production.

#### **South Saxmundham Garden Neighbourhood SCLP12.29**

This 800 home site remains in the masterplan evolution period between two developer-led masterplan consultations. Previously a consultation commenced in December 2020 and we anticipate a second stage consultation on the masterplan in early 2022. Continued work is taking place with Pigeon as the promoter around key technical considerations and masterplan design. Saxmundham Neighbourhood Plan Group have recently commenced a consultation on their draft Neighbourhood Plan including some extensive documents produced for a masterplan and design code for the site. Officers have raised some questions over this, considering the fact that a large part of the site is outside of the Neighbourhood Plan area in Benhall Parish and the need for a considerable evidence base to support any masterplan and design code.

#### **Brightwell Lakes SCLP12.19**

Outline Planning Permission was granted for 2000 homes on this site in 2018. Taylor Wimpey now own the site and have now submitted four new Reserved Matters applications covering the first two phases of development. Two being off the A12 access and two off the Ipswich Road east access. One of the reserved matters applications in each area is to cover a small number of homes as the show homes. Some site preparation has commenced including early attention to protected species on the site and restoration of some of the sand and gravel quarry areas to enable the site to be levelled for development. Full site construction is expected to commence next year with the first homes being delivered by 2024. Close engagement is being maintained with the surrounding communities through the Brightwell Lakes Community Forum.

#### North Felixstowe Garden Neighbourhood SCLP12.3

As an entire site the allocation provides for up to 2000 homes. The Candlet Road site for 560 of those homes, which is a central part of the Garden Neighbourhood, though consented ahead of its allocation has commenced development and the main site access has been constructed along with some internal roads and the first phase of homes. No formal engagement on a wider masterplan has commenced yet though East Suffolk as a key landowner in delivering the wider site is actively working on the assessments and surveys to inform further masterplanning, including collaboration with other landowners. There are plans for public engagement to take place next year. The delivery of a new Leisure Centre underpins this Garden Neighbourhood and this aspect of the masterplan is a leading influence in how the masterplan will be shaped. Further work is progressing through the Major Sites and Infrastructure Team on the trajectory of housing delivery from the Garden Neighbourhood over the next 10 years and importantly when key infrastructure will need to be delivered, including education and health infrastructure.

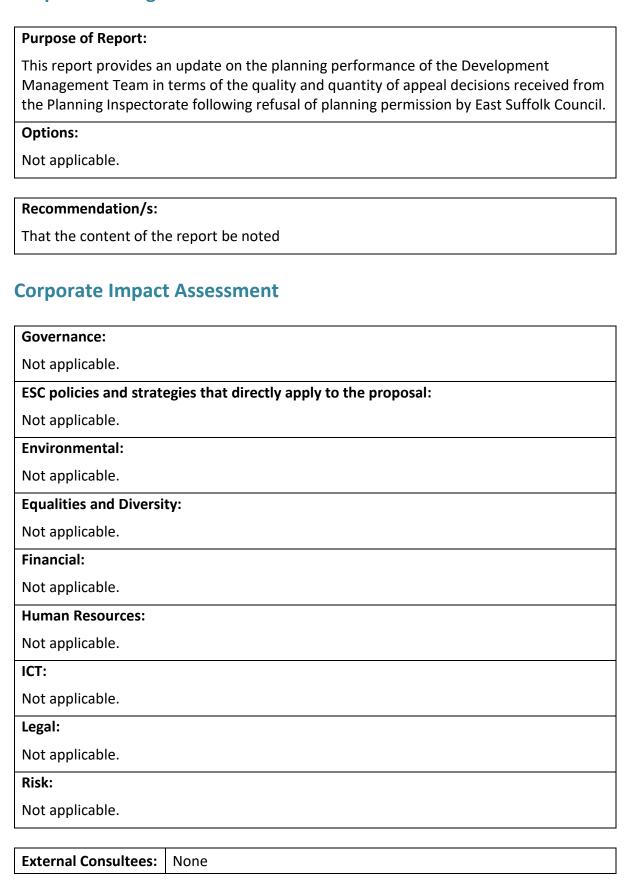


# STRATEGIC PLANNING COMMITTEE Monday, 13 December 2021

Subject	APPEALS PERFORMANCE REPORT – 20 SEPTEMBER TO 1 DECEMBER 2021
Report of	Councillor David Ritchie  Cabinet Member with responsibility for Planning and Coastal  Management
Supporting Officer	Ben Woolnough  Planning Manager (Development Management)  01394 444593  ben.woolnough@eastsuffolk.gov.uk

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

### Purpose and high-level overview



# **Strategic Plan Priorities**

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	$\boxtimes$	
P02	Attract and stimulate inward investment		
P03	Maximise and grow the unique selling points of East Suffolk		$\boxtimes$
P04	Business partnerships		
P05	Support and deliver infrastructure		
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most		×
P08	Maximising health, well-being and safety in our District		
P09	Community Pride		
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
T04	Delivering Digital Transformation		
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		
P18	Skills and training		
P19	District-wide digital infrastructure		×
T05	Caring for our Environment		
P20	Lead by example		⊠
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		
P23	Protection, education and influence		
XXX	Governance		
XXX	How ESC governs itself as an authority		×
How does this proposal support the priorities selected?  To provide information on the performance of the enforcement section.			

# **Background and Justification for Recommendation**

## 1 Background facts

1.1 The report is presented to Members as rolling reporting mechanism on how the Council is performing on both the quality and quantity of appeal decisions received from the Planning Inspectorate.

2	Current position
2.1	A total of six planning appeal decisions have been received from the Planning Inspectorate since the 20 September 2021 following a refusal of planning permission from East Suffolk Council.
2.2	A summary of all the appeals received is included in this report
2.3	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.
2.4	Very few planning refusals are appealed (approximately 20%) and nationally on average there is a 42% appellant success rate for major applications, 27% success rate for minor applications and 39% success rate for householder applications.
2.5	Five of the appeal decisions related to applications which were delegated decisions determined by the Head of Planning and Coastal Management and one decision was determined through the Planning Committee in accordance with the Officer's recommendation.
2.6	Of the planning appeals, four of the decisions were dismissed (66.6%) and two of the decisions were allowed (33.3%) by the Planning Inspectorate.  Four of the appeals were for minor applications with two allowed (50%) and nine dismissed (50%).
	One of the appeals was for householder applications and was allowed (100%)
	One dismissed appeal was for a Certificate of Lawful Existing Development (CLE) and was dismissed.
	The number of appeal decisions in this quarter the Council's success rate too small to give an fair reflection of success against the national averages but the overall 66% success rate provides confidence that the Council is able to robustly defend against unacceptable development and has a suite of policies available to assist defence. The summaries of the appeals include a section on key issues and any lessons which could be learnt.
2.7	There are no significant issues arising with the planning appeals which have been allowed, summaries cover the learning points of all appeals.
2.8	Members will note that one claim of costs against the Council has been received, with the decision refused on the grounds that unreasonable behaviour resulting in unnecessary or wasted expense had not been demonstrated.

3	How to address current situation
3.1	Quarterly monitoring

4	Reason/s for recommendation
4.1	That the report concerning the appeals decisions received be noted

# **Appendices**

Appendices:	
Appendix A	Summary of all appeal decisions received

Background reference papers:
None.

#### Appendix A

The following appeals have been received. The full reports are available on the Council's website using the unique application reference.

### Planning Appeals

Application number	DC/20/4038/FUL
Appeal number	APP/J3530/W/20/3266040
Site	The Bungalow Adjacent Hightrees, Foxhall Road, Foxhall IP4 5SY
Description of	Annex with occasional Holiday Let usage
development	
Committee /	Delegated
delegated	
Appeal decision date	30 September 2021
Appeal decision	Dismissed
Main issues	<ul> <li>The main issues in this appeal are:         <ul> <li>whether the proposal complies with development plan policies for an annex and holiday accommodation, and</li> <li>the effect of the development on European Designated Sites.</li> </ul> </li> <li>The applicant also sought to submit revised plans through the appeal process, which would have altered the application site area, the overall form of the building, the vehicular access and the introduction of parking areas.</li> </ul>
Summary of decision	In terms of the annex use, the Inspector acknowledged that the building is smaller in size than the existing dwelling on the site, but concurred with the Local Planning Authority that  • the self-contained nature of the annexe, • the potential for a separate curtilage as indicated by the red line on the submitted site plan, • the level of facilities provided within the building for day to day living, • that it could be accessed separately from existing drive, and • the separation distance from the main dwelling, would serve to substantially reduce the probability that the occupants of the house and annexe would function as a single household, and that the new unit would be akin to a separate dwelling.  It was concluded that the separation distance would mean it was particularly unlikely that a person living in the annex would routinely walk to the main dwelling, or vice versa, for shared meals or to engage in other joint household activities in all weather.

The Inspector agreed with officers assessment that the building was in a dilapidated state, which would require substantial rebuilding to create a unit of habitable accommodation, and that such works would ultimately result in a new building on the site, as the building is not suitable for conversion.

The creation of a new building for the annexe use would only be justified if there was evidence that it would not be possible to extend the existing dwelling, but this would not overcome the issues created by the separation distance.

In terms of the holiday let use, the Inspector acknowledged that the COVID-19 pandemic has resulting in more people taking holidays within the UK, but also explained that there is nothing substantive to demonstrate that this trend will continue indefinitely or that there is demand for a holiday let in this location.

For the reasons summarised above, the Inspector concurred with the LPA that the development would be in conflict with Policies SCLP5.13 and SCLP6.5 of the East Suffolk Council Suffolk Coastal Local Plan.

In terms of the impact upon European Protected Sites, the decision explains that as the appeal is being dismissed on other substantive issues, and therefore the Inspector considers that it is not necessary to explore the necessity for undertaking an Appropriate Assessment.

The Inspector also concluded that in accordance with the principles established by the courts in Wheatcroft and Annexe M of the procedural guide, that the amended drawings would change the proposed development to such a degree that to consider them would unacceptably prejudice those who should have been consulted on the change including the LPA and any local residents. On that basis and in the interests of procedural fairness, the Inspector determined the appeal on the basis of the plans that were originally submitted with the application only.

# Learning point / actions

This decision concurs with Policy SCLP5.13 (Residential Annexes) and our approach to ensuring that annexes are well related to the host dwelling, and seeking to resist schemes that would result in accommodation akin to a separate dwelling.

This decision also confirms the need to demonstrate need for holiday accommodation as set out in Policy SCLP6.5 (New Tourism Accommodation).
The decision also confirms that where appellant seeks to significantly amend the drawings/proposals through the appeals process, this should be questioned.

Application number	DC/21/1165/FUL
Appeal number	APP/X3540/D/21/3274339
Site	147 Stradbroke Road Lowestoft NR33 7HP
Description of	An extension to the west side of the property, full height and to
development	mirror the length of the original property, with an open ground
	floor storage area allowing access to the back of the property. The
	original roof will be carried across the new proposed west
	extension, finished with matching reclaimed roof tiles to keep the
	1930 style of the house
Committee /	Delegated
delegated	
Appeal decision date	21.09.2021
Appeal decision	Dismissed
Main issues	The main issue is the effect of the development on the character and appearance of the host dwelling and the area
Summary of decision	The Inspector considered that the proposed roof extension would
	introduce a bulky addition to the property. The lack of articulation
	in the form and continuation of the ridge line would appear
	disproportionate and dominant.
	Equally importantly, by extending to the west of the original
	dwelling, the entire width of the plot of No 147 would be infilled.
	Because of the close proximity of the boundary fence, the
	proposed extension would result in a cramped appearance when
	viewed from this part of Stradbroke Road and in the context of the
	spacious immediate neighbouring gardens and access way to No
	149 Stradbroke Road.
	From the information provided, it would appear that the eaves of
	the roof as proposed to be extended, would overhang the
	boundary fence. This would in itself create a discordant feature in
	the street scene and contribute to the cramped appearance of the
	side extension. As such the proposal would cause material harm to
	the character and appearance of No 147 and the streetscene.
	Whilst acknowledging that the appellant has sought to balance the
	appearance of the dwelling and would intend to use matching
	reclaimed roof tiles, the Inspector considered the design would

	represent overdevelopment of the plot. As such it would be out of keeping with the underlying building pattern on this part of Stradbroke Road.
Learning point / actions	This decision acknowledges the importance of streetscene pattern and the visual spacing and relationship between dwellings, as promoted in Policy WLP8.29. A similar application is currently pending, which lowers the ridge height and officers are of the opinion that the amended roof design alone would not overcome these refusal reasons.

Application number	DC/20/4969/CLE
Appeal number	APP/X3540/X/21/3270081
Site	The Chestnuts, Martlesham Road, Little Bealings
Description of	Use of the site edged blue for parking of vehicles.
development	
Committee /	Delegated
delegated	
Appeal decision date	1 October 2021
Appeal decision	Dismissed
Main issues	Whether the parking of cars within the appeal site has resulted in a material change of use of the land.
Summary of decision	The appellant runs an online business selling cars. The parking of cars at the property is in association with that use, with between five and fifteen vehicles parked on the site at any one time. The business is run by the appellant, with no other staff employed.  The Planning Practice Guidance (PPG) advises that planning permission will not normally be required to home work or run a business from home, provided that a dwelling house remains a private residence first and business second. Notable increases in traffic, disturbance to neighbours, abnormal noise or smells or the need for any major structural changes or major renovations may all be taken into account.
	The appellant provided no information on the frequency with which the cars are brought to site, how long cars are parked at the site before they are taken off site, or how are the cars are prepared prior to sale. Furthermore, it is not clear what happens during a visit.  The appellant suggests that there have been no physical alterations to The Chestnuts to facilitate the business activity. However, a number of individuals make reference to the

	installation of fencing and electronic gates which have 'hidden the vehicles' and 'prevents people just wandering in'.
	Although the activity of selling cars and other items privately is not unusual in a residential area, the Inspector found that the scale of the activities is unusual. The number of vehicles is also significantly greater than would be parked as a result of the residential use of the site.
	The Inspector accepted that the Covid-19 pandemic has resulted in a greater shift towards working from home and that business activities can be appropriate in residential areas. However, the acceptability of an activity was found to depend upon the details of the case. Furthermore, the appeal is not an application for planning permission and so the Inspector could not consider the planning merits of the appeal scheme.
	While the inspector agreed that there is only one planning unit, because the site has not been subdivided and the activities are carried out by the occupants of the dwelling - the lack of evidence provided by the appellant did not confirm the activities as incidental to the enjoyment of the dwellinghouse or that a material change of use has not occurred.
Learning point / actions	The appellant failed to provide sufficient evidence to demonstrate, on the balance of probabilities, that a material change of use had not occurred.

Application number	DC/20/4380/FUL
Appeal number	APP/X3540/W/21/3271488
Site	Land south Carlton Road, Kelsale-cum-Carlton, IP17 2NP
Description of	Erection of dwelling with garage (all matters reserved)
development	
Committee /	Delegated
delegated	
Appeal decision date	5 October 2021
Appeal decision	Dismissed
Main issues	Impact on the settlement pattern, character and appearance of
	the site and policy compliance
Summary of decision	The appeal site lies outside but adjacent to the Settlement boundary for Carlton and is within locally designated historic parkland. The site forms part of an undeveloped gap between Carlton to the west and Kelsale to the east. The previous extent of the 'gap' has already been compromised by permission being
	granted for two dwellings. The first of these was allowed on appeal. The application site was the last open space between the

	two settlement boundaries and therefore the Inspector gave this openness and parkland character significant weight despite the previous approvals allowing development which partially eroded this. Proposal also contrary to the Development Plan and NPPF.
Learning point /	Even if some openness or important character of a place or space
actions	has been lost, this doesn't justify further erosion. Significant weight given to settlement coalescence and importance of
	open/parkland character.

Application number	DC/20/1099/FUL
Appeal number	APP/X3540/W/20/3259129
Site	Raceway Services, Back of Market Place, Saxmundham IP17 1AG
Description of	The development proposed is change of use of self-contained
development	ground floor unit: Class A1 to C3.
Committee /	Delegated
delegated	
Appeal decision date	21st September 2021
Appeal decision	Allowed
Main issues	Main issue is the effect of proposed change of use on the vitality
	and viability of Saxmundham Town Centre.
Summary of decision	The appeal site is a small unit, of generally domestic appearance, situated on a quiet back street within both the Saxmundham town centre and Saxmundham Conservation Area. It is not within the recently defined primary shopping area or either the primary or secondary shopping frontages as part of the SCLP. The loss of this small, inconspicuous ground floor unit would not undermine the role and function of Saxmundham town centre as hub for main town centre uses and employment. The loss of this small, peripheral commercial unit would not adversely affect the vitality and viability of Saxmundham town centre. The proposal would not be contrary to SCLP Policies SCLP4.9 and SCLP12.28.
Learning point / actions	The decision was made prior to the adoption of the Local Plan and was in respect of the loss of an employment use. The policies of the Local Plan 2020 provided less support for the retention of a commercial use away from primary shopping area.

Application number	DC/20/1099/FUL
Appeal number	APP/X3540/W/20/3259129
Site	Raceway Services, Back of Market Place, Saxmundham IP17 1AG
Description of	Change of use of self-contained ground floor unit: Class A1 to C3 –
development	Costs decision
Committee /	Delegated
delegated	

Appeal decision date	21st September 2021
Appeal decision	award of costs is refused
Main issues	At the time of the original decision in May 2020, the extant development plan comprised the East Suffolk Council - Suffolk Coastal District Local Plan — Core Strategy and Development Management Development Plan Document 2013. The most important policy for determining the application was Policy DM10 'Protection of Employment Sites'.  The emerging SCLP was a material consideration, however, given the emerging SCLP was still in examination (awaiting an Inspector's report), remained to be adopted and would have still been subject to a period for legal challenge, the degree of weight to be given to the emerging Plan was one for a decision maker, having reference to paragraph 48 of the National Planning Policy Framework. At the time of the decision it may have been reasonable to still ascribe only limited weight to the emerging SCLP, insufficient to indicate a decision other than in accordance with extant Policy DM10.
Summary of decision	Unreasonable behaviour resulting in unnecessary expense, as described in the PPG, has not been demonstrated and the Inspector refused the application for an award of costs.
Learning point / actions	

Application number	DC/20/1127/FUL
Appeal number	APP/X3540/W/21/3270972
Site	North Green Farm, Kelsale-Cum-Carlton
Description of	The provision of one new dwelling.
development	
Committee /	Committee.
delegated	
Appeal decision date	12/11/2021
Appeal decision	Allowed
Main issues	Whether or not the proposal is an acceptable form of
	development having regard to the character and appearance of
	the area and policies of the local plan.
Summary of decision	The application complies with the criteria of clusters as defined in
	SCLP5.4 and considers the non-implemented PN3 conversion to
	the rear to be relevant in the consideration of '5 or
	more dwellings'.

	The inspectorate notes there is a clear identifiable gap in the
	'cluster' with development on two sides, and the proposal will not
	represent an extension of the build-up area into the countryside.
Learning point /	When considering clusters of 5 or more dwellings, the
actions	inspectorate counted a non-implemented application to form one
	of the five residential dwellings and therefore this should be
	considered when determining existing clusters.