



Woodbridge Town Council

Shire Hall Market Hill Woodbridge Suffolk IP12 4LP

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To Members of the Planning Committee

Cllr Adelson

Cllr Bale

Cllr Blois

Cllr Gillard

Cllr Holdcroft

Cllr Miller

Cllr Rawlings

Cllr Sanders

Cllr Sutton

Cllr Walsh

You are hereby summoned to attend a **meeting** of the **Planning Committee** to be held at the **Shire Hall on Tuesday 18th October 2022 at 5pm.**

Greg Diaper

Town Clerk

13th October 2022

Public Attendance

Members of the public and press are welcome to join this meeting. Members of the public will be invited to give their views/questions the Town Council on issues on the agenda or raise issues for consideration or inclusion at future meetings. This item will be limited to fifteen minutes duration but may be extended at the discretion of the Mayor.

Agenda

1. Apologies.

To receive apologies for absence.

2. Declaration 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. Requests for Dispensation.

Councillors with a Pecuniary Interest in an item on this Agenda, who wish to remain, speak, and/or vote during consideration of that item, may apply for a dispensation in writing to the Town Clerk prior to the meeting. Applications may also be considered at the meeting itself should the nature of the interest become apparent to a Councillor at the time of the meeting.

4. Confirmation of Planning Committee Minutes.

To confirm the minutes of the Planning Committee held on 28th September 2022.

5. Public Question Time.

For the public to ask questions of the Council or raise issues for consideration at a future meeting of the Council. 15 minutes maximum.

6. To note intentions to undertake works to trees in the conservation area.

7. To comment on applications to trees with a Tree Preservation Order (TPO).

8. To comment on applications for planning permission.

9. To note East Suffolk Council decisions on Planning Applications where those decision are contrary to this Council's recommendations and not previously reported.

10. To note an extract from ESC Planning's performance review presented at the 11 October ESC Strategic Planning committee meeting.

11. To receive a report from the Chair on the progress of the SALC Planning Group.

12. To consider how to respond to the East Suffolk Council Healthy Environments Supplementary Planning Document.

13. Closure.

Woodbridge Town Council

Minutes of the meeting of the **Planning Committee** held at the **John Gibbins Gallery** on **Wednesday 28th September 2022** at 5pm.

Councillors:

Present: D Adelson, G Holdcroft, S Rawlings, R Sanders, and M Sutton

Apologies: S Bale, C Blois, P Gillard, S Miller and C Walsh

In Attendance: Town Clerk and no members of the public

310. Apologies for Absence

Apologies for absence had been received from Councillors Bale, Blois, Gillard, Miller, and Walsh.

311. To receive Declarations of Interest

No members made any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests in relation to items on the Agenda.

312. To consider requests for Dispensations

There were no requests from Councillors with a Pecuniary Interest in an item on this agenda for a dispensation.

313. To agree and approve the Minutes of the meeting held on 6th September 2022

The minutes of the Planning Committee meeting held 6th September 2022 were approved.

314. Public Question Time.

There were no members of the public present.

315. To note intentions to undertake works to trees in the Conservation Area

The Committee noted the following applications:

- DC/22/3557/TCA - 1 Gladstone Road

316. To comment on applications to trees with a Tree Preservation Order (TPO)

The Committee agreed their comments as set out below .

Application No and Address	Committee Comments
DC/22/3465/TPO - The Wilderness Pytches Road Woodbridge Suffolk IP12 1EP	Woodbridge Town Council are disappointed that this application does not include a detailed replanting scheme – The Pytches Road/ Wilderness Lane area of the town is characterised by it's wild, green nature, therefore we urge to Planning Authority to ensure that a more thorough replanting scheme is a condition added to any approval notice.

317. To comment on applications for planning permission

The Committee agreed their comments as set out below:-

Application No and Address	Committee Comments
DC/22/2005/FUL - Inn Field House 9 Pytches Road	We recommend approval .
DC/22/3504/FUL - 63 Cobbold Road	We recommend approval .
DC/22/3508/FUL - 5 Redstone Mews	We recommend refusal as we consider that this application contravenes SCLP 11.2 – Privacy/ Overlooking – the ability for residents to access the flat roof will allow for views, from above, into the properties on the northern side of New Street. Should the Planning Authority be minded to approve this application we would wish to see higher, and frosted, panels rather than clear.
DC/22/3564/LBC - 72 Seckford Street	We recommend approval .

318 To note East Suffolk Council's decisions on planning applications where those decisions are contrary to this council's recommendations and not previously reported

The Committee noted East Suffolk Council's decisions on planning applications where those decisions are contrary to this Council's recommendations and not previously reported.

319. To comment on Planning Applications DC/22/3108/DRC and DC22/3109/DRC

The Committee noted the communication from the Planning Officer regarding applications DC/22/3108/DRC and DC22/3109/DRC, whereby the Council is not a statutory consultee for Discharge of Conditions (DRC) applications. The Committee agreed the following comments:

- The Committee were disappointed that the Planning Authority did not feel the need to inform Woodbridge Town Council of these applications for a historically controversial site in the town.
- The Committee understand from SCC Highways 22 September response that there is a revised version of the Construction Management Plan for DC22/3109/DRC however we cannot see that this has been uploaded to the portal.
- The Construction Management Plan on the portal, similar to the Demolition Management Plan, is woefully inadequate for the scale of the development in a built-up area. The Committee agreed to recommend refusal to DC22/3109/DRC on that basis as it fails to address or inadequately addresses substantive issues. WTC consider the document should be a copy of the statutory CDM (2015) document required to be produced by the Principal Contractor prior to any construction and demolition work or an abridged version addressing specific issues in detail related to the current planning conditions of the approved application DC/19/2641/FUL."
- The Committee will not consider removing its extant refusal of application DC/22/2641/VOC until both the Construction and Demolition Management Plan are modified to an extant that they satisfy the concerns of all statutory consultees.

320. To note the potential breach of planning control regarding applications DC/22/1359/FUL and, DC/22/1360/LBC - 1 St Johns Street and DC/22/0569/FUL and DC/22/3070/DRC – 8 Russell Close – Verbal update from the Chair

The Chair provided a verbal update on the potential breach of planning control regarding applications DC/22/1359/FUL and, DC/22/1360/LBC - 1 St Johns Street and DC/22/0569/FUL and DC/22/3070/DRC – 8 Russell Close

321. Closure

The meeting was closed at 5.49pm

Councillor Sanders
Chair

Item 6

To note intentions to undertake works to trees in the conservation area (TCA)

Neither the District Council nor the Town Council can object to these works unless the tree(s) is/are covered by a Tree Preservation Order.

DC/22/3729/TCA - 122 Castle Street	Expiry Date: Mon 17 Oct 2022
Woodbridge Suffolk IP12 1HL	Determination Date: Mon 31 Oct 2022
1no. Sycamore (marked on plan) - Reduce in height to half of existing height	

DC/22/3887/TCA - The Abbey School Church	Expiry Date: Wed 26 Oct 2022
Street Woodbridge Suffolk	Determination Date: Sun 13 Nov 2022
1no. Cedar (T1 on plan) - Fell	

DC/22/3878/TCA - Orchard House 99	Expiry Date: Wed 26 Oct 2022
Thoroughfare Woodbridge Suffolk IP12 1AS	Determination Date: Sun 13 Nov 2022
1no. Walnut (T1 on plan) - Crown reduction by up to 2 metres	
1no. Beech (T2 on plan) - Pollard to 2 metres above wall	
1no. Ash (T3 on plan) - Fell	

Item 7

To comment on applications to trees with a Tree Preservation Order (TPO)

No applications this period.

Item 8

To comment on applications for planning permission

DC/22/3574/FUL - Woodbridge School Burkitt	Expiry Date: Thu 20 Oct 2022
Road Woodbridge Suffolk IP12 4JH	Determination Date: Mon 14 Nov 2022
Installation of a new emergency escape door at the rear of the building and installation of 4no. Mitsubishi Electric LGH-80RVX-E mechanical ventilation heat recovery (MVHR) units	

DC/22/3575/LBC - Woodbridge School Burkitt	Expiry Date: Thu 20 Oct 2022
Road Woodbridge Suffolk IP12 4JH	Determination Date: Mon 14 Nov 2022
Listed Building Consent - Installation of a new emergency escape door at the rear of the building and installation of 4no. Mitsubishi Electric LGH-80RVX-E mechanical ventilation heat recovery (MVHR) units	

DC/22/3746/FUL - Apothecary House 64 Thoroughfare Woodbridge Suffolk IP12 1AL	Expiry Date: Thu 27 Oct 2022
	Determination Date: Tue 15 Nov 2022
Construction of one and one half storey stand alone studio and associated tree works	
DC/22/1163/FUL - Waggoners Court Bredfield Street Woodbridge Suffolk IP12 4UP	Expiry Date: Wed 19 Oct 2022
	Determination Date: Thu 02 Jun 2022
Demolition of Scout Hut to facilitate access to carry out repairs to the adjacent wall	
DC/22/2958/FUL - Kingston Hall Kingston Farm Road Woodbridge Suffolk IP12 4BD	Expiry Date: Thu 27 Oct 2022
	Determination Date: Thu 24 Nov 2022
Clarification of land uses and refurbishment/reconstruction of outbuilding/office (Kingston Barn) retrospective.	
DC/22/3778/FUL - Waterside Garage Grove Road Woodbridge Suffolk	Expiry Date: Thu 27 Oct 2022
	Determination Date: Thu 17 Nov 2022
Demolition of the existing sales building and forecourt and the erection of a new sales building, forecourt (domestic and HGV) including underground fuel tanks, pumps and canopy, provision of car parking and EVC hub, and associated works	
DC/22/3740/FUL - Woodbridge School Burkitt Road Woodbridge Suffolk IP12 4JH	Expiry Date: Thu 03 Nov 2022
	Determination Date: Tue 15 Nov 2022
Change of use from residential to educational, including internal alterations to the redundant two storey caretakers flat to create new ancillary rooms. A new staircase is proposed which will provide greater accessibility to the first floor.	
DC/22/3896/FUL - 23 Hasketon Road Woodbridge Suffolk IP12 4LD	Expiry Date: Thu 27 Oct 2022
	Determination Date: Mon 28 Nov 2022
Single storey part side/rear extension, two storey rear extension, erection of 6' 6" fence to replace chain-link fence on front boundary.	
DC/22/1924/FUL - 30A Bredfield Street Woodbridge Suffolk IP12 4NH	Expiry Date: Fri 28 Oct 2022
	Determination Date: Mon 04 Jul 2022
Proposed replacement roof structure to form first floor accommodation, single storey side extension and alterations.	

DC/22/3847/FUL - 9 Briarwood Road Woodbridge Suffolk IP12 4DQ	Expiry Date: Mon 31 Oct 2022
Increase roof height to create chalet bungalow with rear flat roof dormer and rear single storey extension	Determination Date: Wed 23 Nov 2022

Item 9

To note East Suffolk Council decisions on Planning Applications where those decision are contrary to this Council's recommendations and not previously reported.

Date	Application	WTC Decision	ESC Decision	ESC Officer (Delegated) or Committee Decision
05.10.21	DC/21/4004/ARM - Land To The South And East Of Adastral Park	Refusal	Permitted	Committee Decision
05.10.21	DC/21/4005/ARM - Land To The South And East Of Adastral Park	Refusal	Permitted	Committee Decision
19.10.21	DC/21/4557/FUL - Little Kyson Broomheath	Refusal	Awaiting decision	
26.04.22	DC/22/1359/FUL - 1 St Johns Street	Approval	Awaiting decision	
26.04.22	DC/22/1360/LBC - 1 St Johns Street	Approval	Awaiting decision	
26.04.22	DC/22/1163/FUL - Waggoners Court Bredfield Street	Refusal	Awaiting decision	
07.06.22	DC/22/1883/FUL - 33 Grundisburgh Road	Approval	Permitted	Delegated Decision
07.06.22	DC/22/1389/FUL - Skateboard Facility Rear Of Deben Leisure Centre	Approval	Awaiting decision	
07.06.22	DC/22/2005/FUL - Inn Field House 9 Pytches Road	Approval	Awaiting decision	
21.06.22	DC/22/1924/FUL - 30A Bredfield Street Woodbridge Suffolk IP12 4NH	Refusal	Awaiting decision	
21.06.22	DC/22/2241/VOC - 5-7 Tide Mill Way Woodbridge Suffolk IP12 1BY	Approval	Awaiting decision	
21.06.22	DC/22/2068/VOC - Bull Ride 70 New Street Woodbridge Suffolk IP12 1DX	Approval	Awaiting decision	
05.07.22	DC/22/2183/LBC - 50 Hasketon Road Woodbridge Suffolk IP12 4LD	Approval	Permitted	Delegated Decision
05.07.22	DC/22/2399/FUL - 50 Hasketon Road Woodbridge Suffolk IP12 4LD	Approval	Permitted	Delegated Decision
05.07.22	DC/22/2195/FUL - Woodbridge School Burkitt Road Woodbridge Suffolk IP12 4JH	Approval	Awaiting decision	
19.07.22	DC/20/0902/OUT - Suffolk Constabulary Force Headquarters	Refusal	Awaiting decision	
02.08.22	DC/22/2629/FUL - 4 Peterhouse Crescent Woodbridge Suffolk IP12 4HT	Approval	Awaiting decision	
02.08.22	DC/22/2370/FUL - Ferry Quay Cafe Ferry Quay Woodbridge Suffolk IP12 1BW	Refusal	Awaiting decision	
02.08.22	DC/22/2641/VOC - Former Council Offices Melton Hill Melton Woodbridge Suffolk IP12 1AU	Refusal	Awaiting decision	
02.08.22	DC/22/2783/FUL - The Abbey School Church Street Woodbridge Suffolk	Approval	Permitted	Delegated Decision
02.08.22	DC/22/2619/FUL - Land Adjacent To 13 Sun Lane Woodbridge Suffolk	Approval	Awaiting decision	
02.08.22	DC/22/2740/FUL - 58 Victoria Road, Woodbridge, Suffolk, IP12 1EL	Approval	Permitted	Delegated Decision
17.08.22	DC/22/2778/FUL - 101 Ipswich Road Woodbridge Suffolk IP12 4BY	Approval	Permitted	Delegated Decision

17.08.22	DC/22/2751/FUL - 1 Farlingayes Woodbridge Suffolk IP12 1HF	Approval	Awaiting decision
17.08.22	DC/22/2840/FUL - 42 Brook Street Woodbridge Suffolk IP12 1BE	Approval	Awaiting decision
17.08.22	DC/22/2841/LBC - 42 Brook Street Woodbridge Suffolk IP12 1BE	Approval	Awaiting decision
17.08.22	DC/22/2966/VOC - 69 Thoroughfare Woodbridge Suffolk IP12 1AH	Approval	Awaiting decision
17.08.22	DC/22/2973/FUL - 1A St Johns Street Woodbridge Suffolk IP12 1EB	Approval	Awaiting decision
17.08.22	DC/22/2974/LBC - 1A St Johns Street Woodbridge Suffolk IP12 1EB	Approval	Awaiting decision
17.08.22	DC/22/2649/FUL - 10 North Hill Woodbridge Suffolk IP12 1HH	Approval	Awaiting decision
17.08.22	DC/22/2749/FUL - 58 Cumberland Street Woodbridge Suffolk IP12 4AD	Approval	Awaiting decision
17.08.22	DC/22/2750/LBC - 58 Cumberland Street Woodbridge Suffolk IP12 4AD	Approval	Awaiting decision
	DC/22/2982/FUL - Framfield Medical Centre Ipswich Road Woodbridge Suffolk		
06.09.22	IP12 4FD	Approval	Awaiting decision
06.09.22	DC/22/3292/LBC - 9A Church Street Woodbridge Suffolk IP12 1DS	Approval	Awaiting decision
06.09.22	DC/22/3231/FUL - 33 Old Barrack Road Woodbridge Suffolk IP12 4ET	Approval	Awaiting decision
06.09.22	DC/22/3127/FUL - 72 Seckford Street, Woodbridge, Suffolk, IP12 4LZ	Approval	Awaiting decision
06.09.22	DC/22/3352/FUL - 43 Grundisburgh Road, Woodbridge, Suffolk, IP12 4HH	Approval	Awaiting decision
29.09.22	DC/22/2005/FUL - Inn Field House 9 Pytches Road	Approval	Awaiting decision
29.09.22	DC/22/3504/FUL - 63 Cobbold Road	Approval	Awaiting decision
29.09.22	DC/22/3508/FUL - 5 Redstone Mews	Refusal	Awaiting decision
29.09.22	DC/22/3564/LBC - 72 Seckford Street	Approval	Awaiting decision

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	
2.1	Section 33 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) sets out the timeframes for the determination of Planning Applications by Local Planning Authorities, setting a 13-week target for 'Major' applications and 8 weeks for 'non-Major' applications. It is these national targets that East Suffolk Council must seek to meet for the determination of all planning applications.
2.2	These 8/13 week timescales pre-date the 2015 Order and have been in place for decades. They have not been increased in length despite the increasing complexity of applications resulting from increased expectations placed upon the planning process from national legislation and planning policy, leading to increased complexity in the considerations by consultees and the Local Planning Authority in determining such applications.
2.3	This increase in complexity alongside depleting resources nationally both within Local Authorities and external parties who provide consultation responses, leads to increasing pressure and dependency on agreeing extensions of time with agents/applicants, in order for Local Planning Authorities to be able to meet national targets for the proportions of applications determined within either the 8/13 week timescales or agreed extensions of time.
2.4	The numbers of applications determined within these 8/13 week targets and/or agreed extensions of time are monitored and have to be reported to government on a quarterly basis (currently to the Department for Levelling Up, Housing and Communities), who use these figures to monitor the performance of Local Planning Authorities.

2.5	Section 62A of the Town and Country Planning Act 1990 (as amended) allows for certain applications to be made direct to the Secretary of State, where the Local Planning Authority for the area has been designated for this purpose. This 'designation' can be imposed if over a two-year period, a Local Planning Authority fails to meet thresholds for the proportion of 'Major' or 'Non-Major' Planning Applications being determined within statutory target dates (13 or 8 weeks respectively) or within an extension of time agreed with the applicant/agent.
2.6	At the time of the drafting of this report, we are approaching the end of a two-year monitoring period, which started on 1 October 2020 and will end on 30 September 2022. By the date of the Strategic Planning Committee meeting the 2-year period would have completed and a final complete set of statistics will be presented to members.
2.7	The numbers and proportions (as percentages) of 'Major', 'Minor' and 'Other' Planning applications have been reported to members quarterly within the Strategic Planning Committee Reports. During a more recent review of reported statistics, the way in which the figures for 'Others' was calculated previously and thus published in previous Strategic Planning Committee Reports, was identified as being incorrect, as those figures included some forms of 'other' applications that whilst falling within that category in terms of size and scale, are not 'Planning Applications' (e.g. Listed Building Consent, Advertisement Consent). Therefore, they are not used within the calculations used to measure performance at a national level.
2.8	For the same reasons, they should not have been included within the 'Planning Application' decision figures reported to Strategic Planning Committee. Therefore, the quarterly figures relating to 'Minors' and 'Others' for the past 2 years have been recalculated and those figures for 'Major' Planning Applications have also been checked against the data from the application database system and the figures in our quarterly returns to government. These revised figures are included in Appendix A to this report, alongside details of the previously published figures.
2.9	The national targets for the proportions of 'Major' and 'Non-Major' application determinations within the target date or within an agreed extension of time, were also amended in December 2020, but the quarterly reports to Strategic Planning Committee had continued to show the previously set targets. The tables containing the recalculated figures for each quarter within Appendix A, include the current national targets and our own 'stretch' targets.
2.10	The recalculated figures have been used to create the figures within Appendix B, which show the performance in terms of 'Majors', 'Minors' and 'Others' in terms of each quarter over the past two years.

2.11	When looking at these figures the National Target for the percentage of 'Majors' determined within the 13 weeks or an agreed extension of time to be at least 60% for the two-year period. East Suffolk Council is currently at 79% as an overall percentage for the 2-year period, which is comfortably above the 60% threshold, and it has been above this threshold in all relevant quarters, as shown in the table in Appendix B and in the graph in Appendix C.
2.12	The other threshold relates to the combined figures for 'Minor' and 'Other' Planning Applications. It is required to be at least 70% across the two-year period. As can be seen in the table in Appendix B and in the graph in Appendix C, ESC as Local Planning Authority has dipped below this threshold in a number of quarters during the two-year measuring period. However, the important figure is the overall figure which is currently at 73.6% as we approach the end of the two-year period, which means we are on target to meet the required threshold of at least 70%.
2.13	It is acknowledged that it is not ideal that during the two-year period the combined figures for 'Minors' and 'Others' during some quarters were significantly below the target of at least 70% and that the overall figure is not much higher than the 70% threshold. Members of the Strategic Planning Committee have previously received reports setting out reasons and context for some periods where statistics fell below target. This has included a notable period of managerial change reductions in resource in the team. However, the capacity in resource, particularly at a Principal Officer level has been rebuilt over 2022. It should also be noted that the higher result in the most recent/current quarter is as a result of conscious efforts across all Development Management Officers to pull the final quarter figure upwards to achieve in excess of 70%. These figures have only been achieved by virtue of all the hard work and determination of both case officers and those officers who review and sign off reports and recommendations. This success is not something the team can remain complacent over and the recent extraordinary efforts may also not be sustainable without further resource or workload adjustments.
2.14	The recent aim of officers has been to seek to maximise the numbers being determined within time within this last quarter to pull the overall 2-year figure up and has included them securing a significant number of extensions of time, with some officers working significantly above their contracted hours, and signing off/authorising officers prioritising those cases that are due imminently. This has been at the expense of other elements of their roles, such as the quality and speed of pre-application enquiries and potentially affected the ability to seek to optimum improvement the quality of some schemes.

2.15	Therefore, whilst it is good that the 70% target has been achieved, it should also be recognised that the role of Development Management Officers is not only about timeliness of decisions, but they should also be able to seek to improve the quality of the world around us, by seeking to improve development proposals, beyond that which is purely on balance acceptable or not refusable. Extensions of time to the determination period are highly beneficial to meeting targets, and where they are agreed it is hoped that they also reflect a degree of customer satisfaction with the progression of decisions. However, the timeliness of decisions must not be solely relied upon as an indicator of customer satisfaction or the quality of decision making.
2.16	In addition to the figures the government uses to measure performance, it is also important to note that the teams within Planning Services deal with a significant number of other types of application, all of which have their own targets and processes, taking significant officer time over and above that for the 'Planning Applications'. These include but are not limited to applications for Listed Building Consent, Advertisement Consent, Prior Notification Approval, Approval of Matters Reserved by Condition (i.e. discharge of conditions), Non-material Amendments, consultations from other organisations and pre-application enquiries. The overall figures were set out in more detail within the Performance Report to Strategic Committee in June, but it is useful to note that between 1 October 2020 and 19 September 2022 when this report is being drafted the Local Planning Authority determined over 10,200 submissions in that 2-year period (including the planning applications reported quarterly).
2.17	Over the period 1 October 2020 to 31 August 2022, 'Trainee /Assistant Planners' within the Development Management Team determined an average of 449 submissions per officer, with the maximum number of cases being determined by one Trainee /Assistant Planning Officer being considerably higher than this figure at 701 cases. The number of cases dealt with by each officer may have been artificially skewed by staff sickness, the promotion of one officer and the departure of two others during this period. This may explain at least in part the significant difference between the average and the highest number of cases being dealt with by one officer. Alongside dealing with these cases and all that involves including site visits, consideration of the schemes, drafting reports and recommendations, referral panel meetings, planning committee, Trainee/Assistant Planning Officers also take part in our duty planning officer rota system answering informal queries for customers, and therefore these figures for number of applications should not be taken in isolation. Considering such officers are at the earliest stage of their career, and most are also studying part-time, efforts have been outstanding.

2.18	<p>During the same period, 'Planners' within the Development Management Team determined an average of 477 submissions per officer, with the maximum number of cases being determined by one Planning Officer being considerably higher at 617 cases. However, it should be noted that during the monitoring period one of the assistants was promoted to an Officer so that may have affected the averaged for both groups of officers. As per the Trainees/Assistant Officers, alongside dealing with these cases and all that involves Planning Officers also defend Planning Appeals and take part in our duty planning officer rota system, and therefore these figures for number of applications should not be taken in isolation, and the efforts of these officers should be commended.</p>
2.19	<p>During the same period, 'Senior Planners' within the Development Management Team determined an average of 418 submissions per officer (including both full time and part time members of staff), with the maximum number of cases being determined by one Senior Planning Officer being significantly higher at 544 cases. However, the average may have been in part skewed by two of the seniors being part-time and by the retirement of a full-time senior officer, with her position yet to be filled. Senior Planning Officers generally have more complex cases and also have other elements to their role including review and sign off other officer's reports and recommendations, mentoring less experienced members of the team, defending planning appeals, including public enquiries and they are also involved in our duty rota system, and therefore these figures for number of applications should not be taken in isolation, these officers should be praised for dealing with this number of more complex applications alongside the other elements of their roles.</p>
2.20	<p>During the same period, 'Principal Planners' within the Major Projects Team determined an average of 121 submissions, with the maximum number of cases being determined by one Officer being only slightly higher at 126 cases. One member of this team is also involved in our duty rota system. Such officers deal with the largest developments and generally carry a smaller case load than other planning officers.</p>
2.21	<p>The Principal Officers within the Development Management Team are also case officers for some of the submissions made. However, it is difficult to calculate a realistic average for the 2-year period, as the number of officers increased this year, so any average calculated would be skewed significantly by the change from 2 to 3 principal officers three-quarters of the way through the period. It is acknowledged that their case loads are lower than those for other officers, because they have to balance these cases alongside the other elements of their role that arise from being team leaders, including mentoring, general team management, wider case discussions, discussions/meetings with other teams, monitoring of team performance and involvement other projects. Most importantly Principal Planners undertake the daily task of reviewing and signing off other officer's reports and recommendations for delegated decisions, the referral panel and planning committees etc. The majority of the 10,200+ applications over the past 2 years have been signed off by Principal Planners and Senior Planners.</p>

2.22	It is also important to recognise that these two-year performance figures for Planning Applications and the overall numbers of cases determined, whilst useful, do not show the quality of decisions being made and/or improvements officers have worked hard to secure in order to improve developments. Whilst there is no quantitatively means to measure the latter of these, the quality of decisions can be in part be assessed by the outcomes of appeals against the decisions of the Local Planning Authority to the Planning Inspectorate. There is a separate report on this schedule which details the Planning Appeal outcomes for this past quarter.
2.23	Therefore, as explained above, the team has met the government overall targets for the determination timeframes for applications, but there is a limited buffer between the target threshold and the figures achieved for the two-year period, and this has in part only been achieved by the diligence and exhaustive efforts of various members of the Development Management Team during recent quarters.
2.24	Therefore, officers and members should not be complacent in thinking this approach is sustainable in the longer term with the current status quo of resources. However, it should also be recognised that processes are already in motion to fill the vacant senior officer post, and wider consideration is also being given to how we organise teams within the Development Management Team. Alongside this other external lead processes are expected to enable officers to work more efficiently. These include the introduction of a new Document Management System (DMS), a new Geographical Information System and tablets with an app that links to the database and the new DMS for use during site visits.

3 How to address current situation

3.1 Quarterly monitoring.

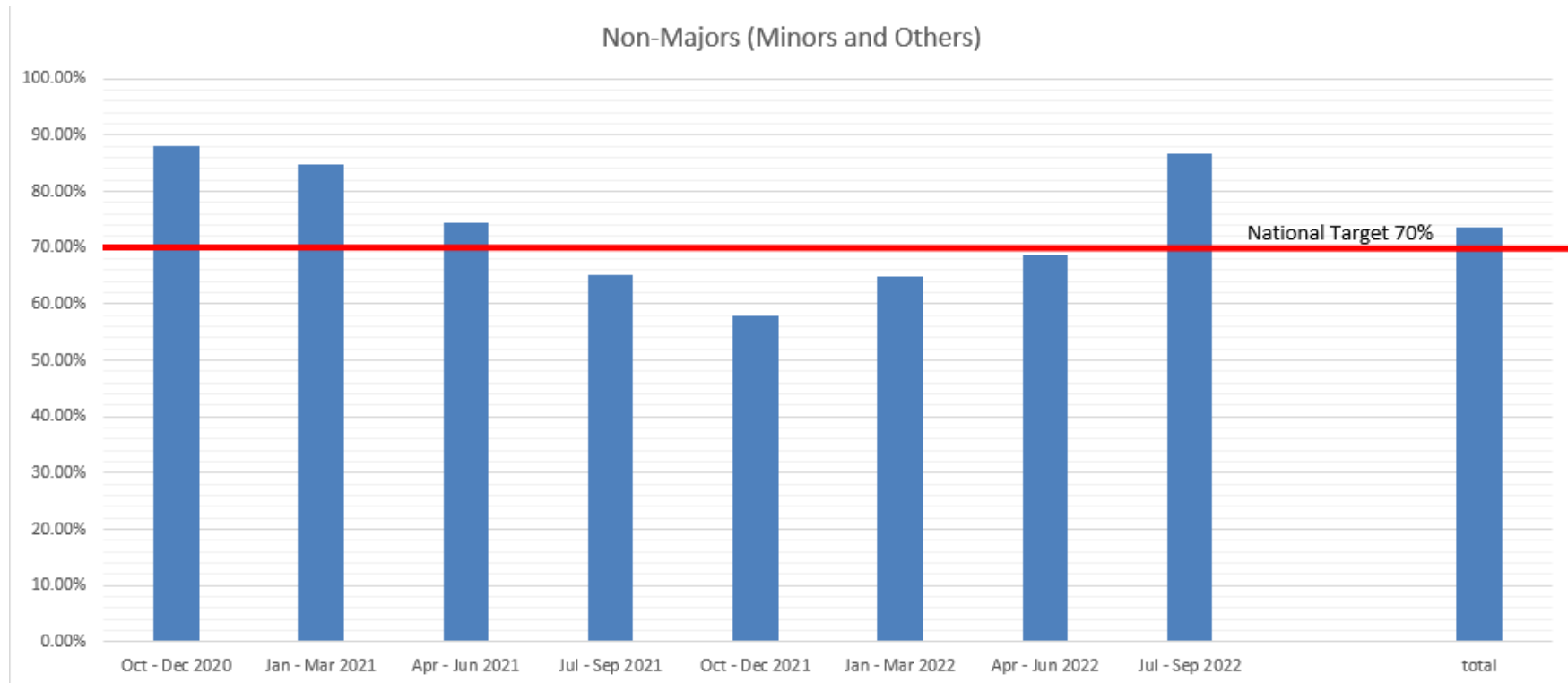
4 Reason/s for recommendation

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

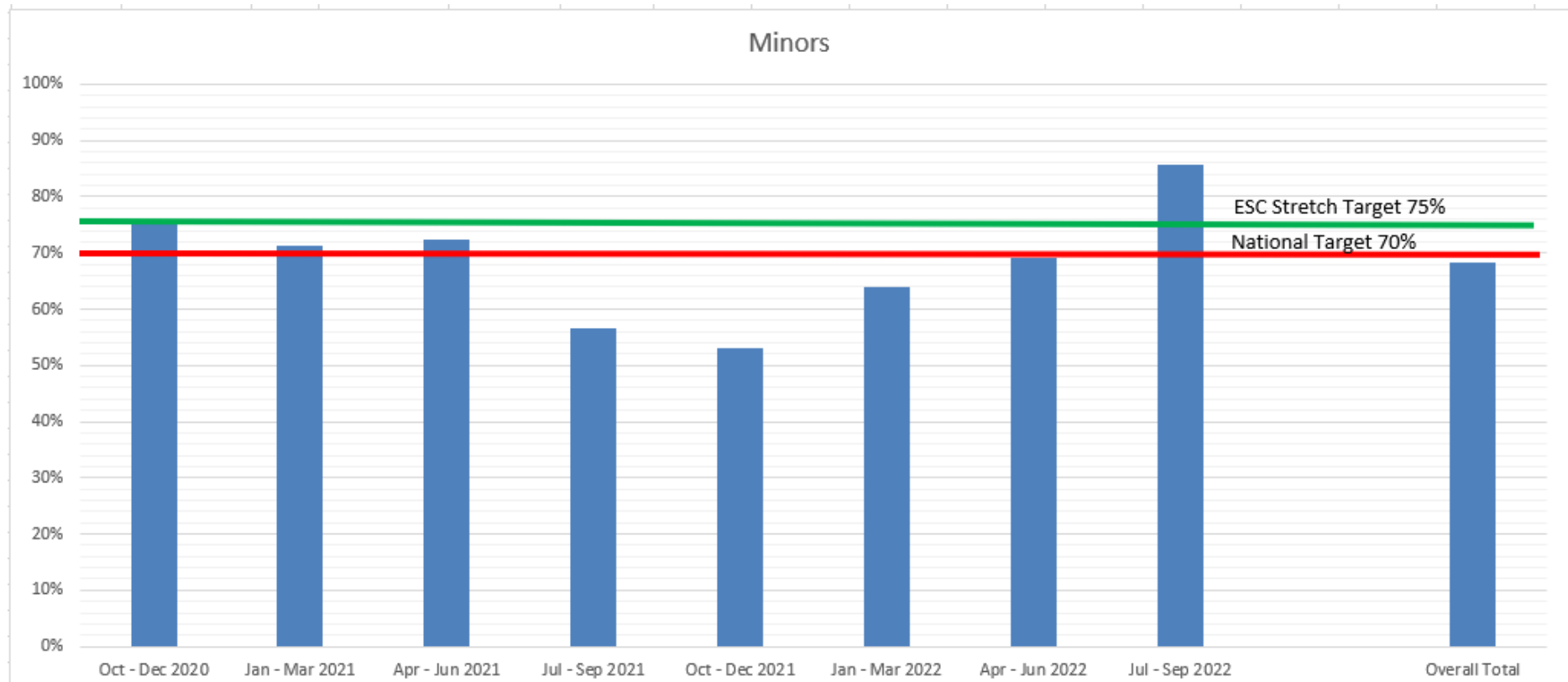
Appendices

Appendices:	
Appendix A	The recalculated figures for each quarter from 1 October 2020 to 19 September 2022
Appendix B	Table showing the performance of East Suffolk during each quarter from 1 October 2020 to 19 September 2022, and predicted levels for the 2-year period.
Appendix C	The figures for each quarter from 1 October 2020 to 19 September 2022 shown in graph form

Appendix C: The figures for each quarter from 1 October 2020 to 19 September 2022 shown in graph form



Appendix C: The figures for each quarter from 1 October 2020 to 19 September 2022 shown in graph form



Background and Justification for Recommendation

1 Background facts	
1.1	This report provides details on the role and activities of Planning Enforcement at East Suffolk Council, the current situations and actions that are proposed to improve the way in which the service functions.
1.2	The key points raised within this report have been identified over the past year following management changes in the Development Management, Major Sites and Infrastructure Team. This includes commencement of Katherine Scott as Principal Planner (Technical Lead) overseeing the enforcement service. The report has also been informed by comments raised by the Planning Committees over the past year and comments raised in the June 2012 Scrutiny Committee. A significant influence has been given to the findings of an Audit Report produced in 2018/19 with outstanding Planning Enforcement actions and a more recent Audit report focussing on areas of progress and intentions in that respect. Other matters that have been identified by members of the team that can be addressed concurrently are also outlined within this report, for example, improvements to the way in which the software is utilised.
1.3	This report sets out the current position, and then how we plan to address the current situation in the form of an annual Planning Enforcement Action Plan. This plan is based upon Audit Reports from earlier this year and 2018/19, and discussions at Scrutiny Committee.
1.4	The key outstanding findings of the Audit Report from 2018/19 are: <ul style="list-style-type: none">• Improvements to the use of software and monitoring, primarily the need to use the system software effectively to improve electronic and efficient working, and data quality concerns existed.

1.5	<p>The findings of the Audit Report from earlier this year are:</p> <ul style="list-style-type: none"> • It remains the case that improvements to the use of software and monitoring, are required primarily the need to use the system software effectively to improve electronic and efficient working, and data quality concerns existed, with specific reference to: <ul style="list-style-type: none"> ○ the enforcement module of Uniform is currently underutilised, ○ Monitoring against the Enforcement Performance standards is not in place and there is doubt over whether the data inputted is sufficient to be relied upon in quarterly reports to members without manual checks, which means the service is unable to measure its own success, ○ The ‘access reports’ that pull data from the system do not currently pull data for the last day of the month, so require manual adjustments to be made to quarterly reporting to Strategic Planning Committee, ○ Accidentally created duplicate cases cannot be closed off as such so on the rare occasions these are logged, they cannot be easily identified and/or removed from overall case numbers. ○ Lack of formal review/signing off process prior to closer of cases. ○ Reasons for closure and reasons for decision options within the uniform system do not align.
1.6	<p>The minutes of the June 2022 Scrutiny Committee are included as Appendix E to this report.</p>

2 Current position

2.1	<p>In considering the role and activities of Planning Enforcement at East Suffolk Council, key consideration should be given to paragraph 59 of the NPPF which states:</p> <p><i>“Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.”</i></p>
2.2	<p>An Action Plan monitoring table has been produced and is included as Appendix D to this report. It will be updated and presented to each Strategic Planning Committee until all actions have been concluded.</p>

2.3

ACTION 1 : Caseloads and Resources

As reported in Appendix M to the Planning Performance Report to Strategic Planning Committee in June 2022, and in the quarterly Enforcement Performance Reports to each Strategic Planning Committee, East Suffolk Council continues to receive a significant number of reports of potential breaches of Planning Control. The number of cases/reports received each month is shown per month in Figure 1 below.

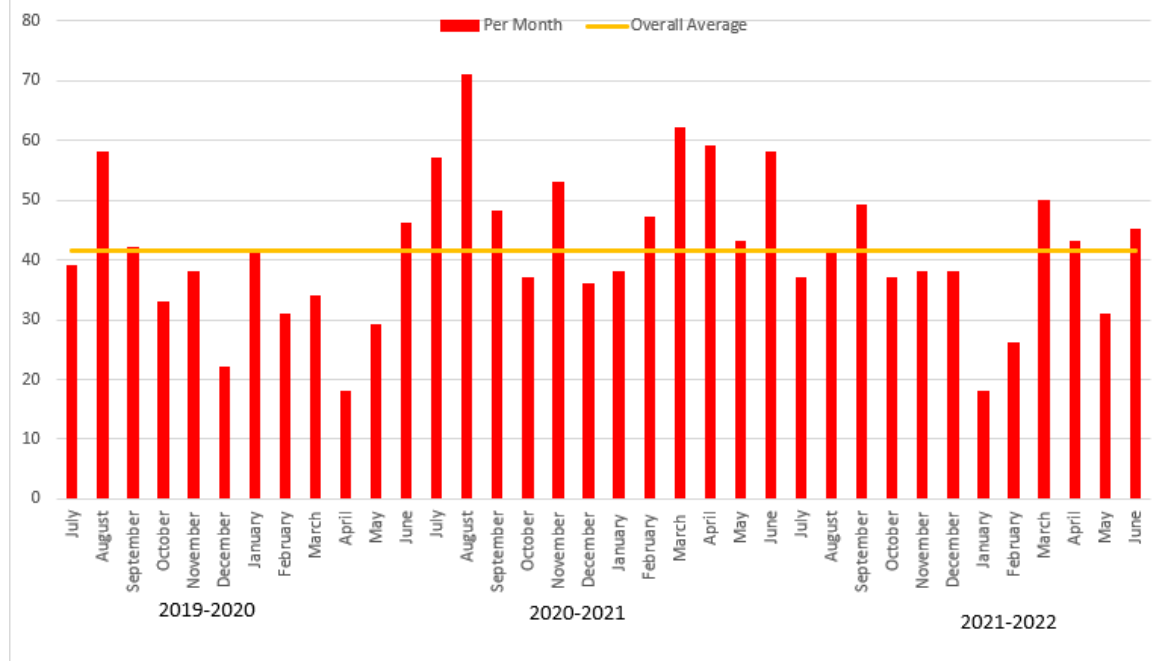


Figure 1: The number of cases reported to Planning Enforcement each month from July 2019 – June 2022.

2.4

Whilst in some cases the matters on which enforcement reports are made, are not matters that there are any planning controls over, a number are not planning related, or turn out not to be breaches of planning control, they all have to be logged and investigated by the team, which in the majority of cases includes a site visit, after which an assessment has to be made as to whether there is a planning breach and if so if it is expedient to take formal action.

2.5

Each of these steps along with the associated process logging on every case, takes significant officer time. This means that often the process generally takes a few weeks to complete, even if there is no breach and the process runs smoothly, which in turn means that often even the simplest cases cannot be closed within the same month that they are received, and therefore these potentially simpler cases accumulate along with those that are more complex requiring longer investigations, more communication with site owners and complainants etc and potentially leading to formal action, meaning that the number of cases open at any one time is significantly greater than the number of cases reported in that particular month.

2.6	As the Enforcement Team currently comprises of just three full time members of staff, comprising a Senior Planning Enforcement Officer, one Assistant Planning Enforcement Officer for the north Area and one Assistant Planning Enforcement Officer for the South Area. This means that the majority of the current Planning Enforcement Caseload is split across just three officers. As of 1 September 2022, the two Assistant Planning Enforcement officers had 165 and 233 cases open each, with a further 10 cases yet to be logged.
2.7	By comparison, details of caseloads and officer numbers have been provided informally by colleagues at other Local Planning Authorities from across the country, who attended a course with our Assistant Enforcement Officers. Of the six authorities who have shared their figures, the majority of the full-time members of staff have caseloads ranging from 35-100 cases each. There is one authority who has reported, that their full-timer member of staff has 212 cases but that they are also in the process of reviewing their enforcement team and process. Although this is not an extensive survey of caseloads at other authorities, it provides a useful snapshot, and confirms what officers already suspected, that caseloads need to be significantly lower than they are currently in order to be more manageable.
2.8	The audit report highlighted a number of older cases which were allocated to officers outside the Enforcement Team (e.g. those within Development Management). Whilst the team are attempting to review these cases and close them where appropriate, their ability to undertake this task is limited by their workload capacity.
2.9	<u>ACTION 2: Use of software and digitisation</u> It is recognised by officers that the database software and the associated document management software are not being used to their full potential. For example, emails and letters to site owners/developers and complainants are often generated manually outside the system.
2.10	It is also recognised that there has been some inconsistency in the past in the way in which certain tasks have been logged within the database, for example notes on a visit to the site, were logged by some but not all officers within the database, with some making notes elsewhere. This has been resolved in terms of current and new cases as they are only allocated to officers within the enforcement team, and the members of that team have a consistent approach to such matters.
2.11	The current document management system which sits alongside the database is also not particularly user friendly, and it takes significant time for documents to be added to it and labelled appropriately. The enforcement officers have not had time to perform these tasks with their current caseloads, and the team has been without administrative support for many years. Therefore, the majority of documentation relating to current enforcement cases, and recently closed cases, is being held securely elsewhere, outside the database document management system.

2.12	Enforcement Notices are currently produced outside the uniform system, and therefore providing quarterly reports to members on the number of notices served is a manual process.
2.13	The priority levels for enforcement cases that can be selected within the uniform software do not currently align with those within the East Suffolk Local Planning Enforcement Policy , which means data on cases of different priority levels cannot be pulled directly from the system.
2.14	Officers also acknowledge that there are a significant number of historic enforcement cases that remain open on the system. These cases require review, before it is decided how to proceed (i.e. whether further investigation is required and the following steps that might result or whether the case should be closed).
2.15	<p><u>ACTION 3 : Signing off Process</u></p> <p>The audit report raised concern that enforcement cases can be closed by individual case officers without formal record of independent review by an authorising officer. The three enforcement officers meet weekly to discuss live cases and another weekly meeting takes place with the Principal Planner (Technical Lead) and Development Management Officers of the ‘Enforcement and Technical Team’, during which cases are also discussed. Therefore, cases that the case officer is uncertain of in terms of either it being a breach of planning control, and/or if it is expedient to take action are discussed before being closed, and cases on which we are proceeding towards or through formal action are also discussed, but there are no written minutes of those meetings, and the cases are not currently formally signed off by an authorising officer on the database system through a formally adopted process.</p>
2.16	<p><u>ACTION 4: Reporting of updates on cases to members</u></p> <p>It is recognised that there are issues with the way in which the “East Suffolk Enforcement Action – Case Update” report to Planning Committees is set out, which results in the information on some cases stretching across several pages, and it is not always immediately clear what the current status and/or latest action on the case is.</p>
2.17	<p><u>ACTION 5: Questions from members on enforcement cases</u></p> <p>Officers have concerns with some of the questions asked during Planning Committee’s on enforcement cases that are under investigation but have not reached a point whereby they would be included on the “East Suffolk Enforcement Action – Case Update” report to Planning Committees.</p>
2.18	Whilst the members wish for an update on such cases recognised, the information provided in a public forum such as Planning Committee, has to be carefully considered in a sensitive manner. In some circumstances, particularly if a case has only recently been received/logged, contact with the site or property owner may not have been made and therefore they may not be aware that there is a potential issue, prior to it being raised in this public forum.

2.19	Discussing cases that are not in the Enforcement Report could also result in data protection breaches, as details can be revealed that should not be in the public domain, particularly when reference is made to named individuals and/or their addresses. Other potentially sensitive data can also be revealed which should not be discussed in a public forum, on cases at all stages of investigation.
2.20	It should also be recognised that if certain details are revealed about a case. it can potentially affect how any action can proceed, particularly if we reveal that formal action is about to take place or that certain legal advice on how to proceed has been received. Therefore, officers are limited in what information they can provide in such a forum.
2.21	As explained earlier in this report, the officers dealing with enforcement have a significant number of cases. Therefore, whilst there will be some cases they recall in great detail, given the volumes of cases, they cannot reasonably be expected to recall the precise details of every case currently assigned to them. This means that they may well not be able to answer unexpected questions on the cases not on the “East Suffolk Enforcement Action – Case Update” report to Planning Committees.

3 How to address current situation

3.1	<p><u>Caseloads and Resources</u></p> <p>In order to address the issue of high caseloads and to provide an efficient and customer focused enforcement service, two additional posts are proposed to be created. The first would be an Enforcement Officer level position, and the second would be an administrative support position.</p>
3.2	The additional Enforcement Officer level position would support the Senior Enforcement Officer and the wider team. A copy of the proposed structure chart is included as Appendix C.
3.3	The additional administrative support position will assist the Team in providing additional help by way of logging cases, data support and generally assisting the team. It is proposed that this is delivered as part of the Planning Support and will be provided as part of a wider range of small changes to that team to ensure that it service the planning service as a whole, not just Development Management and Building Control as it currently does.
3.4	This report here presents the initial business case for these two further roles, with the recruitment of an Enforcement Officer to be an immediate action and the support officer to be provided as soon as possible thereafter. It is recognised that the presenting of this recommendation for increased staffing resource cannot be solely agreed by Strategic Planning Committee, and is dependent upon agreement from elsewhere including in terms of financial agreement to fund the post. Therefore, whilst there is full intention to create and fill such a post, it must be

	recognised that there remains some uncertainty as to if and when this can be achieved.
3.5	Whilst increasing the number of staff will reduce the number of cases on hand with each officer (i.e. their individual caseloads), which should enable the workloads to be more manageable, it is important to recognise that the formal logging, investigation and communication processes will still have to be adhered to, even on cases that do not then result in formal enforcement action, and all of these processed take time. A number of actions proposed in this report will also add responsibilities and additional administrative work to current enforcement officers.
3.6	A further area of work where officers are keen to increase attention is on the monitoring of the implementation of development. This is in respect of how developments progress in accordance with approved plans and how conditions are complied with. It is not the role of the Local Planning Authority to closely monitor and undertake checks on development and the majority of development does get undertaken completely in accordance with approved plans and conditions. However, there are cases where the Council can take a more proactive stance in reviewing implemented and completed development, particularly major development.
3.7	This includes the implementation of landscaping and tree planting, where the Council controls the need to replace any planting which has failed in the first 5 years. With the last very dry summer and climate change there are risks that planting, particularly trees and hedges, can fail and we need to be ready to request their replacement. Furthermore, as part of developing skills of officers and having wider awareness of design quality, visiting developments which are underway and completed is incredibly valuable to development of planning and design skills and hold developers to greater account over design quality. This will need wider planning service involvement to take forward aspirations as it remains difficult to accommodate a proactive alongside the current reactive approach to this in terms of resources and demands of day-to-day decision making. But with the heightened importance of high-quality design and challenges of climate change, monitoring is an increasingly important part of development management.
3.8	For the reasons outlined in paragraphs 2.4 to 2.6 of this report, enforcement cases will still take time to deal with, and therefore even with additional resources, it will not be possible to close the majority of even the simplest cases within a period of less than 3-4 weeks (21-28 days). Therefore, it is also recommended that the timeframe bands used to monitor time taken to close enforcement cases, are adjusted to be a truer and fairer reflection of realistic potential timeframes for the process to be undertaken.

3.9	These bands are currently set in 9 day intervals (i.e. 1-10 days, 11-20 days, 21-30 days, 31-40 days and 40+ days), which means that often cases fall into the 31-40 days and 40+ days categories, because as explained above the process by its very nature takes at least a few weeks to be completed even on the most straightforward cases where there is no breach. This means that there is a lack of detail on the actual length of time that those taking the longest time actually take to close or resolve. Therefore, it is proposed to alter the time-taken monitoring bands to 19 day intervals of 1-20 days, 21-40 days, 41-60 days, 61-80 days, 81-100 days, 101-120days and 121 days +.
3.10	The monitoring bands for the closure of cases are not formally defined within the Local Planning Enforcement Policy, and therefore they can be adjusted without any further formal process.
3.11	<p><u>Use of software and digitisation</u></p> <p>It is recommended that we seek to utilise the software to improve processes and save time where possible. For example, in order to reduce the need for officers to manually input certain information to letters and emails that are being sent out, the software can be set up with templates, that automatically pull through certain details such as the customers contact information and the enforcement case reference number and address. Whilst this may not save more than a few minutes each time a letter or email is created, cumulatively this could save the officer's significant time.</p>
3.12	In time, it is also hoped that the system can be set up with templates for enforcement notices, stop notices etc. Although such documents will likely still require manual review and potential editing by the Enforcement Team and/or the Legal Services Team once generated from the system, if they can be created through the system and their service logged in a consistent manner within the database, it should also reduce the work required in terms of manual calculations to produce the quarterly updates on numbers of notices served etc.
3.13	The priority levels for enforcement cases need to be amended within the uniform system so that they align with those in the East Suffolk Local Planning Enforcement Policy , so that data on number of cases of each priority level and whether targets are being met etc can be pulled directly from the system, and in time lead into the PowerBi software.
3.14	The way in which 'events' such as site visit are now being logged within the database, should enable statistical reports to be set up to pull information from the system, as a means of monitoring officer workloads, time taken for a certain action to take place on each case etc, which in theory should be able to feed into the PowerBi software that is beginning to be utilised across East Suffolk Council. The intention to utilise this software to enable closer monitoring of general process and caseloads, with the aim of understanding where the potential pressure points are in our process, and overall workload numbers etc.

3.15	A new document management system is currently in the process of being set up and rolled out across the council. This is produced by the same company as the database system we already use for planning applications and enforcement cases, and therefore is designed to work with it in a more cohesive manner than the current document management system. The new software is also more user friendly in terms of the way files are labelled and organised. Therefore, the Enforcement Team aim to utilise this software once in place, however, this will be in part dependent upon having administrative support to assist them with logging new cases and adding documents to the document management system as and when they are received or generated.
3.16	Alongside this, there will also be a need to transfer documents, photographs, letters, emails etc on current live cases and previously closed cases into the new document management system, which will take significant time. This process maybe aided by administrative support, but given the volumes of data involved, addition support from the wider planning support team and/or elsewhere maybe required.
3.17	The review of the historic enforcement cases on the system will take time, and much of this process needs to be undertaken by officers with Planning Enforcement and/or Development Management experience. However, once the reviewing process has been undertaken there may be associated tasks that could be undertaken by administrative support officers. Therefore, it is hoped that with the additional resource of an additional Enforcement Officer and a specific Enforcement Administrative Support Officer, progress can be made on clearing down the backlog of historic cases.
3.18	Whilst it would be advantageous to commence the digital changes as soon as possible, the timing will be very dependent upon the recruitment of officers to fill the two new posts within the Planning Enforcement Team and also be dependent upon the ICT changes that are currently underway across the authority, and then the capacity of officers within the Enforcement Team and ICT to create and set up automated processes within the software and other things such as letter templates.
3.19	<u>Signing off Process</u> The lack of formal written audit trail of the review of cases by an officer other than the allocated case officer is recognised. It is therefore proposed that a formal signing off process will be put in place, so that cases are reviewed by an authorising officer (a senior or a principal) as part of all cases being closed. Whilst some cases have been reviewed and 'signed off' since 1 August 2022, which demonstrates that a formal review and signing off procedure can be undertaken through the uniform system, the process undertaken so far is reliant upon reviewing officers looking in the system for cases that have been 'closed' by cases officers. A more formal process needs to be created so that files automatically pass to a 'available tasks' list for reviewing officers.
3.20	Introducing this process will ensure that electronic case files pass from case officers to reviewing/signing off officers at the appropriate time, with no chance of

	<p>them disappearing into the ether. It will also mean that those cases requiring review can be seen as items that need doing and thus stay on the radar of reviewing officers, which reduce the risk of them being overlooked due to other competing workload pressures.</p>
3.21	<p>The timing for this process to be formerly introduced will be dependent upon changes to the electronic system, so that trigger points are set up so at the required time, the electronic case files pass from the case officers workload list to the reviewing/signing off officer's 'available tasks' list.</p>
3.22	<p>However, in putting in place this process, it should be recognised that this means all such cases will need to be reviewed and signed off, primarily by the Senior Enforcement Officer and the Principal Planner (Technical Lead). This means the timing for closing cases through the review process will be dependent upon their availability. Alongside reviewing and signing off enforcement cases, they also have many other elements of their roles including their own caseloads, mentoring team members, the serving of notices by the Senior Enforcement Officer, and the review and signing off of planning related applications, team leader responsibilities and technical tasks by the Principal Planner (Technical Lead). Therefore, other elements of their role may have to take priority at certain times, in order to meet other targets and deadlines including government targets on the formal applications. In addition, there will be times when officers are unavailable due to annual leave. Therefore, there is likely to be a delay in some enforcement cases being reviewed, which in turn will likely affect the numbers of cases being closed within certain time frames, and in turn skew the statistics for the number of cases dealt with within certain timeframes.</p>
3.23	<p>The introduction of this reviewing and signing off process, is important in order to address the concerns raised in the Audit Report. However, in the view of officers, it should not be seen as the end of the improvements to the way in which officers utilise the system, and therefore in the longer term, the intention is to also look at means by which other trigger points can be set up and utilised, not only to enable certain tasks to automatically complete such as the transfer of case files between officers, but also as means of monitoring the enforcement process with reference to our Enforcement Policy such as the time taken for the first site visit to take place, Alongside this as mentioned elsewhere in this report we will also seek to set up means by which the system can be used to automatically complete certain content on letters, notices etc.</p>
3.24	<p><u>Reporting of updates on cases to members</u> As outlined in the 'current position' section of this report, it is recognised that the existing "East Suffolk Enforcement Action – Case Update" report to Planning Committees is not set out in the most user-friendly manner. It is therefore recommended that the template used for this report is altered.</p>

3.25	The new format in Appendix A includes a copy of a blank table which will be completed for each case and examples of the table completed for two existing cases to illustrate how it would appear. The contents of those tables are a copy, paste and reorganisation of the data published in a recent report to a Planning Committee, so the same level of information is still being provided.
3.26	This format is proposed with the aim of presenting the information in an easier to read format, making it clear at which stage a particular case has reached, whilst ensuring the level of detail provided to members is not diminished by this new approach.
3.27	<u>Questions from members on enforcement cases</u> As outlined in the ‘current position’ section of this report, there are significant concerns with questions being raised by members in the public forum of Planning Committees on cases that are yet to reach the “East Suffolk Enforcement Action – Case Update” report. These are matters that should be raised outside the public meeting.
3.28	However, it is recognised that members will wish to ask questions and receive updates on cases that are not on the “East Suffolk Enforcement Action – Case Update” report. As outlined in paragraph 3.20 of this report there are significant concerns with answering such queries during public meetings, including those related to data protection and potential implications for future legal action. Therefore, members should raise queries on such cases outside those meetings and it is proposed a new protocol for raising these queries is followed, which will comprise the steps detailed in Appendix B, which will be shared with all members following this Strategic Planning Committee Meeting.

4 Reason/s for recommendation

4.1	That the report concerning the overview of the proposed plan of action and recommendations for resolving issues highlighted within the Audit Report of the delivery of Planning Enforcement and key issues identified by officers within the team is noted, and support is provided to its implementation.
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Appendices

Appendices:	
Appendix A	New Committee Report template style for the reporting of formal Enforcement Action on cases.
Appendix B	Protocol for Members to raise queries on cases
Appendix C	Proposed Team Structure
Appendix D	Enforcement Action Plan Timeframes

Item 12

To consider how to respond to the East Suffolk Council Healthy Environments Supplementary Planning Document

The Healthy Environments SPD will provide guidance to support the application of policies in the adopted Local Plans on how the design of new development can help support our communities' health and wellbeing.

What is a Supplementary Planning Document?

Supplementary Planning Documents (SPDs) expand upon policy and provide further detail to support the implementation of policies in Local Plans. Whilst not a part of the development plan, they are a material consideration in the determination of planning applications. The Local Plan policies, which this SPD provides guidance on, can be viewed on the Council's website: www.eastsuffolk.gov.uk/localplan.

The Purpose of the Healthy Environments SPD

The Healthy Environments SPD is intended to provide planning and design guidance for creating built environments and accessible natural infrastructure which help to support our communities' health, weight status, inclusion, social connectivity, wellbeing, and amenity. The Healthy Environments SPD is also proposed to provide useful tools and guidance (or to sign post to further external guidance) for use during the design and appraisal processes to support the delivery of development proposals with the capacity to improve these key health and wellbeing outcomes, and that reduce potential for health inequalities within new communities.

The need to ensure that built environments are inclusive of all ages and abilities, to promote healthier lifestyles (increasing activity and reducing overweight and obesity), to tackle physical and mental health and life expectancy inequalities within the district, and to reduce anti-social behaviour and crime (including the fear of crime) were identified through the preparation of the East Suffolk Local Plans. Improving the health and wellbeing of those who live and/or work in the district were identified as key strategic priorities for both the Suffolk Coastal Local Plan (adopted September 2020) and the Waveney Local Plan (adopted March 2019).

The Healthy Environments SPD is therefore being produced to support interpretation of the policies of the adopted Local Plans that are intended to deliver on the respective Plans' strategic priorities for health and wellbeing. This is through addressing the range of 'wider determinants of health and wellbeing that arise from how built environments and the accessible natural spaces that support them are planned and designed.

Recent changes in national legislation, policy and guidance, and the greater focus on health inequalities, weight status and social connections following the COVID-19 pandemic

have further increased the need for guidance on Local Plan policy interpretation for achieving positive health and wellbeing outcomes.

The SPD will also supersede and update the guidance included in the former Suffolk Coastal district's SPG15 Outdoor Playing Space (2001).

Initial Consultation Questions

1. Do you consider the proposed scope (range of Local Plan policies and topic areas that have been included or excluded) of the SPD to be appropriate? Yes/No
If 'No', please suggest how you think the scope should be amended.

2. Do you consider the proposed content (the intended approach of the guidance to be included under each topic area) of the SPD to be appropriate? Yes/No
If 'No', please suggest how you think the content should be amended.

3. How valuable do you think an East Suffolk Health Impact Assessment template (or series of templates for different types of development proposals) to assess development proposals would be?

4. How valuable do you think a Healthy Environments Master Checklist of design considerations for use as a tool during the design process of a development proposal would be?

5. Are there any elements of national policy or guidance related to the creation of healthy environments that you consider would benefit from additional guidance in the SPD? Yes/No
If 'Yes', please explain what guidance is required.

6. Are there any developments or places that you think are good practice examples of overall health-supporting environments, or that have excelled in a particular aspect of creating health-supporting environments (for example, healthy homes and workplaces, inclusive design, active travel, natural infrastructure, encouraging community cohesion, etc.) that you would like to suggest for use as case studies in the SPD?
If so please list them below, and if possible please provide hyperlinks to more information.

7. Are there any examples of good practice guidance (for example, included in other SPDs or guidance documents) you think would be helpful to consider in the preparation of the SPD?
If so please list them below, and if possible please provide hyperlinks to more information.

8. Do you have any other comments or information that you would like us to consider

in drafting the Healthy Environments SPD?

About this consultation

This is the first stage of consultation and will inform the preparation of the Healthy Environments SPD. The aim of this consultation is to gather feedback on what you think the SPD should include and address. The proposed content of the SPD and a series of consultation questions are set out further below.

Please respond to this consultation by

5pm Monday 7th November 2022, via one of the following means:

- Complete the online questionnaire;
- Email your response to planningpolicy@eastsoffolk.gov.uk; or
- Post your response to Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

The Full Initial Consultation Document has been uploaded to SharePoint.

Members are asked to consider how to respond to the East Suffolk Council Healthy Environments Supplementary Planning Document.