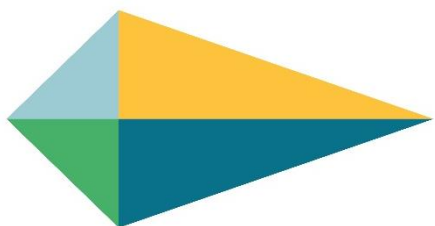


Consultation Statement

Affordable Housing Supplementary Planning Document

April 2022



EASTSUFFOLK
COUNCIL

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1 Introduction

The Affordable Housing Supplementary Planning Document (SPD) will provide guidance on the key policies of the Suffolk Coastal Local Plan and Waveney Local Plan that are intended to communicate the Council's expectations for the appropriate number, mix, design and location of affordable housing to be delivered in the district over the plan period to 2036. The SPD will also provide guidance on Section 106 agreements, financial contributions for off-site provision, community-led affordable housing, Local Housing Needs Assessments, viability assessments, exception sites, and making planning applications.

Once adopted, the Affordable Housing Supplementary Planning Document will replace the following documents:

- Affordable Housing Supplementary Planning Document (May 2012) – this relates to the former Waveney local planning authority area;
- Supplementary Planning Guidance 2 Affordable Housing (July 2004) – this relates to the former Suffolk Coastal area.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement¹. At the start of preparation of the SPD the Statements of Community Involvement adopted in September 2014 were in place (covering the former Waveney and Suffolk Coastal districts). The Council adopted a new Statement of Community Involvement in April 2021 which applies to the consultation on the draft SPD and to the adoption of the SPD. While preparing the Affordable Housing SPD East Suffolk Council has consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

An initial stage of consultation was held for 6 weeks between 9th November and 21st December 2020. A formal consultation on the Draft SPD was held for 6 weeks between 1st November and 13th December 2021.

This Consultation Statement was first produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to accompany the consultation on the Draft SPD which was held between 1st November and 13th December 2021 and has subsequently been updated to reflect the consultation responses received during that consultation.

¹ How to get Involved in Local Planning – Statement of Community Involvement (April 2021) - www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf

2. Who was consulted?

Consultation was split into two stages: an initial stage that informed the preparation of the Draft Supplementary Planning Document; and a formal stage of consultation that sought views on the Draft SPD.

Initial consultation

The initial consultation was carried out between 9th November and 21st December 2020. The following organisations and groups were consulted during the preparation of the Supplementary Planning Document:

- Registered Providers of affordable housing
- Community led housing organisations
- Town and Parish Councils
- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Home Builders Federation
- Homes England

The consultation was also made available to the public on the Council's website.

Consultation on the Draft SPD

Consultation on the Draft SPD was held between 1st November and 13th December 2021. At the formal stage of consultation, all of those registered on the Council's planning policy mailing list were directly consulted, including those listed above. Steps were taken to advertise the consultation to others, as set out below.

3. How were they consulted?

There were two stages to the consultation process, which are set out below.

Initial consultation

The initial consultation ran from 9th November to 21st December 2020 and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/affordablehousingspd2020/consultationHome>

The consultation was advertised on the Council's website, as well as on social media (see Appendix 1). A questionnaire, providing some background to the consultation and asking a series of questions, was published on the Council's website. Town and parish councils,

elected members and other organisations referred to above were notified directly by email or post.

Hard copies of the document were also made available free of charge by post by contacting the Planning Policy and Delivery team as the usual locations for viewing documents were closed to the public, due to the Covid-19 pandemic.

The consultation asked the following questions:

1. Do you consider that the proposed content of the SPD is appropriate?
Yes/No
If no, please suggest how the scope and content of the SPD should be amended.
2. Are there any elements of the existing [Affordable Housing Supplementary Planning Document \(May 2012\)](#) or the [Supplementary Planning Guidance 2 Affordable Housing \(July 2004\)](#) that should be retained?
Please provide details.
3. Are there any elements of the existing [Affordable Housing Supplementary Planning Document \(May 2012\)](#) or the [Supplementary Planning Guidance 2 Affordable Housing \(July 2004\)](#) that should **not** be retained?
Please provide details.
4. Are there any specific elements of the Local Plan policies that you consider require additional guidance in the SPD?
If yes, please explain what guidance is required.
5. Are there any elements of national policy on affordable housing that you consider require additional guidance in the SPD?
If yes, please explain what guidance is required.
6. Are there any specific elements of Section 106 agreements that you consider need particular explanation or guidance in the SPD?
If yes, please explain what guidance is required.
7. Do you have any views on the design of affordable housing that you consider should be addressed in the SPD?
8. Are you aware of any good practice in existing SPDs from elsewhere that could be applied in East Suffolk?
If yes, please provide details.
9. Do you have any other comments for us to consider in drafting the Affordable Housing SPD?

In total 22 individuals and organisations responded to the consultation. Between them they made 194 comments, as summarised in the table in Appendix 2.

Full copies of the responses have been published on the Council's website at <https://eastsuffolk.inconsult.uk/affordablehousingspd2020/listResponses>.

As part of the initial consultation the Council also held a focused virtual roundtable session involving stakeholders who regularly engage with the Council on the preparation of Section 106 agreements on affordable housing (developers and Registered Providers and their legal representatives) to seek views on the preparation of model Heads of Terms and Template Clauses. This was held over two sessions, the first to discuss general matters and the second focusing on emerging draft wording. A summary of the matters raised is contained in Appendix 3.

Consultation on the Draft SPD

The Draft Affordable Housing SPD consultation ran from 1st November and 13th December 2021 and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/ESAFFHSGDRAFT/consultationHome>

The consultation was advertised on the Council's website, as well as on social media. 4,069 emails and 583 letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes town and parish councils, individuals, and organisations including those who were previously contacted or responded to the informal stage of the consultation. The list of consultation bodies can be found at Appendix 4.

The consultation was advertised through the use of posters (provided to Town and Parish Councils and libraries), a press release and social media posts. The poster, press release and example social media posts that accompanied the consultation can be found in Appendix 5.

Hard copies of the draft Affordable Housing SPD and accompanying Consultation Statement were made available at all libraries in the district and in the Council's Customer Service Centres at the Marina Centre in Lowestoft, Woodbridge Library and Felixstowe.

Due to the ongoing impacts of the Covid-19 pandemic, for those unable to view the documents online, at a library or in the Customer Service Centres, an offer of assistance along with contact details for the Planning Policy and Delivery Team was included on letters, emails and the poster.

In total 27 individuals and organisations responded to the consultation. Between them they made 111 comments. The summaries of comments made and the Council's response to these is available at Appendix 6.

Full copies of the responses have been published on the Council's website at

[Draft Affordable Housing Supplementary Planning Document - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

Appendix 1 – Initial Consultation – Social Media



Appendix 2 – Initial Consultation

The table below lists the main issues raised in the consultation responses, the Council’s response and how they informed the preparation of the document.

1. Do you consider that the proposed content of the SPD is appropriate?

Respondent	Summary of Comments	Council response
Artisan PPS Ltd (Short, Leslie)	Yes	Noted
Councillor Beavan (East Suffolk Councillor)	Yes	Noted
Reydon Parish Council (Jordan, Julie)	Yes	Noted
Trimley St Martin Parish Council (Ley, Caroline)	Yes	Noted
Felixstowe Town Council (Tadjrishi, Ash)	Reference should be made to self build schemes and assistance available to those looking to self build.	Guidance on affordable self-build has been included in the SPD. As the focus of the SPD is on affordable housing and self and custom build are not necessarily affordable by definition (unless built as an affordable tenure) the focus is on matters associated with developing affordable self build. The Council’s webpages

Respondent	Summary of Comments	Council response
		<p>on self build and custom build provide further information including links to national organisations for further information. See https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/self-build-and-custom-build/.</p>
<p>Greenhill, Chris</p>	<p>No. Affordable housing provided in new development should be to rent. The consequence of favouring home ownership has been a decline in housing to rent at affordable rents. A proportion of the population are unlikely to be able to buy their own homes.</p>	<p>The SPD cannot set new policy. The Local Plan policies (SCLP5.10 and WLP8.2) set out policy on the tenure split and this reflects national policy and the Strategic Housing Market Assessment which is a key piece of evidence underpinning the Local Plan policies. Guidance is covered under Chapter 3 ‘Identifying an appropriate mix of affordable housing’.</p>
<p>Felixstowe Town Council (Tadjrishi, Ash)</p>	<p>The most up to date evidence should be used to establish an appropriate mix of tenures.</p>	<p>The SPD cannot set new policy. The Local Plan policies (SCLP5.10 and WLP8.2) set out policy on the tenure split and this reflects national policy and the Strategic Housing Market Assessment which is a key piece of evidence underpinning the Local Plan policies. Guidance is covered in Chapter 3 of the Draft SPD on identifying an appropriate mix of affordable housing.</p>
<p>Felixstowe Town Council (Tadjrishi, Ash)</p>	<p>Energy efficiency standards, parking, access to electric charging points, access to cycling and walking links, and access to public transport for new affordable housing units/developments should be delivered at the same quality level as equivalent sized and located market value units/developments.</p>	<p>Chapter 7 of the Draft SPD on design explains that the policies of the Local Plans that relate to design apply to affordable housing as well as to market housing.</p>
<p>Felixstowe Town Council</p>	<p>The SPD should be clear on how East Suffolk Council will be involved in developing its own housing stock.</p>	<p>The Council has produced a Housing Development Strategy which sets out the Council’s approach to the direct provision of</p>

Respondent	Summary of Comments	Council response
(Tadjrishi, Ash)		affordable housing. This is referred to in the introduction to the SPD and can be viewed at https://www.paperturn-view.com/uk/east-suffolk/housing-development-strategy?pid=NzU75318&v=1.1 .
Great Bealings Parish Council (Knights, Dee)	Yes. Appropriate subject to the need to review the Neighbourhood Plan.	Reference to Neighbourhood Plans being able to set their own policies based on evidence is included in the introduction.
Kettleburgh Parish Council	Generally consider the content is appropriate however would hope that there is sufficient detail to address the concerns of our Parish and issues faced by Small Villages.	Comment noted – see responses to other comments from Kettleburgh Parish Council.

2. Are there any elements of the existing Affordable Housing Supplementary Planning Document (May 2012) or the Supplementary Planning Guidance 2 Affordable Housing (July 2004) that should be retained? Please provide details.

Respondent	Summary of Response	Council Response
Artisan PPS Ltd (Short, Leslie)	No	Response noted.
Reydon Parish Council (Jordan, Julie)	The important elements appear to be included in the proposals.	Comment noted.
Felixstowe Town Council (Tadjrishi, Ash)	The 2004 SPG contained useful background sections on the gaps between wages and house prices, resulting social problems and the role of Affordable Housing policies and contained a brief and clear summary of Government and local policies. This should be done in 'layman's' style. There should be an explanation of what an SPD is. There should be a glossary and an Appendix containing the full Local Plan policies with the addition of cross references to longer Local Plan sections. The 2004 SPG also contained a useful sub-heading on the 'threshold' approach.	The Council has developed a template style for the SPDs it is producing in order that users can navigate similarly laid out documents. The Introduction provides the context to the affordable housing issue in East Suffolk but the focus of the SPD is on providing guidance for the implementation of the Local Plan policies. There is not considered to be a need to include the full text of the Local Plan policies as the SPD should be read alongside the Local Plan. Chapter 7 of existing SPG 2 contained a lot of detail on the 'threshold' approach i.e. affordable housing as a proportion of housing development due to the Local Plan policies in place at the time. As the Local Plans set out clear policy requirements for the proportion and tenure mix of

		affordable housing expected there is no need to evidence this through the SPD.
Greenhill, Chris	Retain provided that the emphasis is on affordable housing to rent.	The SPD cannot set new policy. The Local Plan policies (SCLP5.10 and WLP8.2) set out policy on the tenure split and this reflects national policy and the Strategic Housing Market Assessment which is a key piece of evidence underpinning the Local Plan policies. Guidance is covered under Chapter 3 'Identifying an appropriate mix of affordable housing'.
Peninsula Villages Community Land Trust (Brown, Jenny)	CLTs should also be included as providers of affordable housing. References to social housing should be enlarged to include 'social and other affordable housing'. The number and type of properties required by key workers should be included.	Reference to Community Land Trusts, as a form of community-led housing, is included in the SPD, in particular under Chapter 2 'Types of affordable housing'. The policies in the Local Plans refer to the tenure types that are expected where affordable housing is delivered as part of residential development. Information on different tenures is expanded on in the SPD. The SPD also contains guidance on identifying an appropriate mix to inform the development of exception sites.
Peninsula Villages Community Land Trust (Brown, Jenny)	The provision of cash in lieu of housing should be available for 15 rather than ten years and part should be available to CLTs.	The Council is preparing a commuted sums spending policy. Reference to the commuted sums policy has been included in the SPD.
Home Builders Federation	It is necessary to maintain the elements relating to financial viability. It is especially the case for the Waveney area as	Guidance on viability is set out in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan. The SPD cross refers to this.

(Behrendt, Mark)	the Local Plan was adopted in the transition between the 2012 and 2019 NPPFs. A viability note is attached.	
Pigeon Investment Management (Pathfinder Development Consultants)	Retain the elements related to viability. Necessary steps where a variation is sought should be simple and timely. Developers should be able to continue to negotiate. This is especially true in Waveney as the Local Plan was adopted in the transition between the 2012 and 2019 NPPFs.	Guidance on viability is set out in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan. The SPD cross refers to this.
Kettleburgh Parish Council	The headings from the 2004 SPG should be retained with further elaborations. There should be more detailed consideration on Small Villages.	The broad headings and content have been retained / adapted where appropriate. The guidance would apply to development coming forward in Small Villages.
Peninsula Villages Community Land Trust (Brown, Jenny)	It should be acknowledged that housing provided by CLTs have no rights to buy.	This is explained in Chapter 2 of the Draft SPD which provides information about community led affordable housing.

3. Are there any elements of the existing Affordable Housing Supplementary Planning Document (May 2012) or the Supplementary Planning Guidance 2 Affordable Housing (July 2004) that should not be retained? Please provide details.

Respondent	Summary of Response	Council Response
Felixstowe Town Council (Tadjrishi, Ash)	It will not be relevant to have a lengthy interpretation of Local Plan policies as they have been recently adopted.	The SPD provides interpretation of Local Plan policies, such as around identifying local needs for affordable housing, however the focus is on areas of policy where additional guidance is to be provided.
Kettleburgh Parish Council	N/A	Response noted
Reydon Parish Council (Jordan, Julie)	N/A	Response noted

4. Are there any specific elements of the Local Plan policies that you consider require additional guidance in the SPD?

Respondent	Summary of Response	Council Response
Artisan PPS Ltd (Short, Leslie)	No	Response noted
Felixstowe Town Council (Tadjrishi, Ash)	No	Response noted
Councillor Beavan (East Suffolk Councillor)	Yes. Special provision should be made for tourist areas where supply is reduced and private rents are beyond the scope of working families. The housing market also inflates land values. If intermediate rent could be charged then more affordable homes could be provided.	The exception sites policies in the Local Plans (SCLP5.11 and WLP8.6) allow for the development of affordable housing in locations where market housing would not be supported, and therefore where market land values should not be expected. Rent to Buy includes a period of intermediate rent, as set out in Chapter 2 of the draft SPD which explains the different tenures of affordable housing. The Strategic Housing Market Assessment, which has evidenced the affordable housing policies in the Local Plans, considered the needs for affordable housing and the tenures that would help to address those needs.
Reydon Parish Council (Jordan, Julie)	Yes. There should be a rigorous assessment in place to justify market housing on exception sites, reduced proportions of affordable housing or commuted sums.	The policies only support reduced affordable provision in exceptional circumstances. Exception site policies (SCLP5.11

Respondent	Summary of Response	Council Response
		and WLP8.6) only support market housing where needed to cross subsidise affordable housing provision.
Kettleburgh Parish Council	Yes. Consider over and under supply of affordable housing in small villages - more may come forward yet it is difficult to fill existing ones.	Chapter 6 on Exception Sites and Chapter 8 on local housing needs assessments set out guidance in relation to identifying needs for affordable housing. Any future development of affordable housing on exception sites should be informed by an assessment of local need.
Great Bealings Parish Council (Knights, Dee)	The standing of the NP should be reconfirmed subject to any review required in the context of the new Local Plan.	The SPD acknowledges that Neighbourhood Plans may also contain policies related to affordable housing.
Kettleburgh Parish Council	There should be guidance on controlling housing in the countryside including in clusters (SCLP5.4) and on exception sites (SCLP5.11). SCLP5.10 Settlement Coalescence should be rigorously tested to ensure exception sites do not lead to coalescence.	Chapter 6 on Exception Sites sets out guidance on applying the part of the policies that state that the character and setting of a settlement should be retained or enhanced. Policy SCLP5.4 is not covered by this SPD as it relates to the provision of housing more generally and not just affordable housing.

5. Are there any elements of national policy on affordable housing that you consider require additional guidance in the SPD?

Respondent	Summary of Response	Council Response
Artisan PPS Ltd (Short, Leslie)	Yes. The SPD should cover entry level exception sites as per para 71 of the NPPF.	Paragraph 5.72 of the Suffolk Coastal Local Plan explains that such schemes would be supported under Policy SCLP5.10 where they form part of a mix of affordable housing provision identified in a housing needs survey. The Planning Practice Guidance on First Homes was published in May 2021 and also sets out policy for First Homes exceptions sites which has been referenced in Chapter 6 of the draft SPD.
Felixstowe Town Council (Tadjrishi, Ash)	Yes. National planning policy on affordable housing should be clearly reflected in the SPD and consistent with housing policies on affordable housing.	National policy as set out in the National Planning Policy Framework and the Planning Practice Guidance (including PPG on First Homes and Build to Rent) is referred to in the draft SPD.
Greenhill, Chris	Yes. Do not agree with national policy emphasis on affordable home ownership	Response noted. The tenure mixes are set out in Local Plan policies SCLP5.10 and WLP8.2.
Reydon Parish Council (Jordan, Julie)	Yes. The tenure mix of affordable housing in designated rural areas should be restricted to affordable rented and shared ownership with a staircasing limit of 80%.	The tenure mixes set out in the Local Plan policies have been informed by the assessment of housing need undertaken through the Strategic Housing Market Assessment. The Government has also recently introduced a First Homes policy under which 25% of affordable housing delivered on a residential development through a planning obligation should be First Homes. Where an exception site comes forward the

		need would need to be identified through a housing needs assessment as set out in Chapter 6 and Chapter 8 of the draft SPD.
Kettleburgh Parish Council	Yes. Concerned that the NPPF does not provide sufficient protection from residential development in the countryside that is visually harmful.	In terms of affordable housing in the Countryside, the exception sites policies (SCLP5.11 and WLP8.6) require that development should retain or enhance the character and setting of the settlement. The SPD provides further guidance in Chapter 6 and Chapter 7.
Kettleburgh Parish Council	Concern over the impact of development of affordable housing on the countryside. The need for development should not take priority over protecting the countryside.	In terms of affordable housing in the Countryside, the exception sites policies (SCLP5.11 and WLP8.6) require that development should retain or enhance the character and setting of the settlement. The SPD provides further guidance in Chapter 6 and Chapter 7.

6. Are there any specific elements of Section 106 agreements that you consider need particular explanation or guidance in the SPD?

Respondent	Summary of Response	Council Response
Artisan PPS Ltd (Short, Leslie)	Yes. Setting standard trigger point(s) for the phased delivery of affordable housing in alignment with market housing and incorporating within standard model terms.	The draft model Heads of Terms in Appendix 2 of the Draft SPD sets out trigger points for the phasing of market housing alongside the occupation of affordable housing.
Felixstowe Town Council (Tadjrishi, Ash)	Yes. Clarity should be provided on where S106 is applicable and where CIL is applicable.	Reference has been included in the SPD to the Council's Discretionary Social Housing Relief Policy and how this operates, in Chapter 11.
Great Bealings Parish Council (Knights, Dee)	Yes. Local priority is essential in the context of a small rural community	A local connections cascade is set out in the draft Model Heads of Terms and Template Clauses which would be applied to new affordable housing development unless otherwise agreed.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The biggest cause of delay is an appropriately worded Mortgagee in possession clause that is acceptable to the Registered Providers' funders. Model clauses should be agreed with Registered Providers to avoid lengthy delays while Deeds of Variation are agreed and implemented. The Council should not seek to inappropriately secure affordable housing in perpetuity. Wording agreed elsewhere is put forward for consideration covering 'chargee' and 'charge provisions'.	A mortgagee protection clause has been included in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD. The Council anticipates that a mortgagee protection clause will be published by the Government in its template planning obligations in relation to First Homes.

<p>Park Properties (Pathfinder Development Consultants)</p>	<p>The biggest cause of delay is an appropriately worded Mortgagee in possession clause that is acceptable to the Registered Providers' funders. Model clauses should be agreed with Registered Providers to avoid lengthy delays while Deeds of Variation are agreed and implemented. The Council should not seek to inappropriately secure affordable housing in perpetuity. Wording agreed elsewhere is put forward for consideration covering 'chargee' and 'charge provisions'.</p>	<p>A mortgagee protection clause has been included in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD. The Council anticipates that a mortgagee protection clause will be published by the Government in its template planning obligations in relation to First Homes.</p>
<p>Pigeon Investment Management (Pathfinder Development Consultants)</p>	<p>Yes. The biggest cause of delay is an appropriately worded Mortgagee in possession clause that is acceptable to the Registered Providers' funders. Model clauses should be agreed with Registered Providers to avoid lengthy delays while Deeds of Variation are agreed and implemented. The Council should not seek to inappropriately secure affordable housing in perpetuity. Wording agreed elsewhere is put forward for consideration covering 'chargee' and 'charge provisions'.</p>	<p>A mortgagee protection clause has been included in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD. The Council anticipates that a mortgagee protection clause will be published by the Government in its template planning obligations in relation to First Homes.</p>
<p>Wellington (Pathfinder Development Consultants)</p>	<p>The biggest cause of delay is an appropriately worded Mortgagee in possession clause that is acceptable to the Registered Providers' funders. Model clauses should be agreed with Registered Providers to avoid lengthy delays while Deeds of Variation are agreed and implemented. The Council should not seek to inappropriately secure affordable housing in perpetuity. Wording agreed</p>	<p>A mortgagee protection clause has been included in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD. The Council anticipates that a mortgagee protection clause will be published by the Government in its template planning obligations in relation to First Homes.</p>

	elsewhere is put forward for consideration covering 'chargee' and 'charge provisions'.	
Reydon Parish Council (Jordan, Julie)	Yes. S106 agreements should be encouraged by guidance and/or model text which enable affordable housing to be maintained in perpetuity including outside DPAs.	The draft model Heads of Terms require affordable housing to be retained in perpetuity or for the proceeds from a final sale to be held by the Registered Provider and reinvested in affordable housing in East Suffolk.
Kettleburgh Parish Council	Yes. CIL payments should be explained in detail. Landscape and drainage enhancements should be addressed, including SuDS, new hedgerows and tree planting, and every project should identify these opportunities.	Chapter 11 of the draft SPD includes information on CIL in relation to affordable housing. Chapter 7 on the design of affordable housing provides guidance on integrating affordable housing and explains that sustainable construction policies apply to affordable housing development. Further guidance on sustainable construction including SuDS is contained in the draft Sustainable Construction SPD.
Felixstowe Town Council (Tadjrishi, Ash)	Yes. Clarity should be provided on where S106 is applicable and where CIL is applicable.	Chapter 11 includes information on CIL in relation to affordable housing.
Kettleburgh Parish Council	CIL payments should be explained in detail and should cover the upgrade to services and infrastructure. Landscape and civil drainage enhancements should be addressed. There should be a mechanism that enables every project to identify enhancement and mitigation.	Chapter 11 includes information on CIL in relation to affordable housing.

7. Do you have any views on the design of affordable housing that you consider should be addressed in the SPD?

Respondent	Summary of Response	Council Response
Artisan PPS Ltd (Short, Leslie)	There should be clarity on whether the Council will be adopting Nationally Described Space Standards for affordable housing.	The Nationally Described Space Standards have not been included in the adopted Local Plans, but reference to them is encouraged in Chapter 7 of the draft SPD.
Bungay Town Council	All new builds to be built to high environmental standards, and units to be larger internally and with more outside space.	Chapter 7 of the draft SPD explains that the design policies of the Local Plans apply to affordable housing and sets out guidance in relation to provision of sufficient indoor and outdoor space in terms of both quantity and quality.
Greenhill, Chris	Affordable housing needs similar if not better design than private sector housing.	Chapter 7 of the draft SPD explains that the design policies of the Local Plans apply to affordable housing and sets out guidance in relation to 'tenure blind' design. It wouldn't be appropriate to expect or require higher quality design of affordable housing (than market housing) as this would lead to market housing being of a lower quality of design.
Felixstowe Town Council (Tadjrishi, Ash)	Design standards should be the same regardless of tenure type; affordable housing should be indistinguishable from market housing.	Chapter 7 of the draft SPD explains that the design policies of the Local Plans apply to affordable housing and sets out guidance in relation to 'tenure blind' design.
Great Bealings Parish Council (Knights, Dee)	'Made' Neighbourhood Plan policies should guide the design of affordable housing exception sites.	Chapter 7 of the draft SPD acknowledges that Neighbourhood Plans may have design policies that would apply to proposals for exception sites.

<p>Hopkins Homes Ltd (Pathfinder Development Consultants)</p>	<p>The policies of both Local Plans should undergo viability assessment.</p> <p>Affordable housing should be clustered in groups of no more than 30 dwellings, smaller clusters are inappropriate as 15 affordable rented (50%) would be a very modest amount.</p> <p>The affordable housing element of schemes should be designed to minimise service charges relating to common and shared space as they affect affordability.</p> <p>Apartment blocks should be tenure specific where possible, or have separate accesses, in order to enable the freehold transfer to an RP.</p>	<p>Viability assessment was carried out as part of Local Plan preparation, and the policies in the Local Plan are therefore considered viable to achieve.</p> <p>The SPD seeks to ensure that affordable housing is integrated and therefore Chapter 7 sets out that clustering should be proportionate and that generally a cluster of up to 10 dwellings would be considered appropriate.</p> <p>From a design point of view the SPD would encourage mixed tenure apartment blocks however recognises that this can cause operational issues so does provide for circumstances where single tenure would need to be provided.</p>
<p>Park Properties (Pathfinder Development Consultants)</p>	<p>The policies of both Local Plans should undergo viability assessment.</p> <p>Affordable housing should be clustered in groups of no more than 30 dwellings, smaller clusters are inappropriate as 15 affordable rented (50%) would be a very modest amount.</p> <p>The affordable housing element of schemes should be designed to minimise service charges relating to common and shared space as they affect affordability.</p>	<p>Viability assessment was carried out as part of Local Plan preparation, and the policies in the Local Plan are therefore considered viable to achieve.</p> <p>The SPD seeks to ensure that affordable housing is integrated and therefore Chapter 7 sets out that clustering should be proportionate and that generally a cluster of up to 10 dwellings would be considered appropriate.</p> <p>From a design point of view the SPD would encourage mixed tenure apartment blocks however recognises that this can</p>

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<p>Wellington (Pathfinder Development Consultants)</p>	<p>The policies of both Local Plans should undergo viability assessment.</p> <p>Affordable housing should be clustered in groups of no more than 30 dwellings, smaller clusters are inappropriate as 15 affordable rented (50%) would be a very modest amount.</p> <p>The affordable housing element of schemes should be</p>	<p>Viability assessment was carried out as part of Local Plan preparation, and the policies in the Local Plan are therefore considered viable to achieve.</p> <p>The SPD seeks to ensure that affordable housing is integrated and therefore Chapter 7 sets out that clustering should be proportionate and that generally a cluster of up to 10 dwellings would be considered appropriate.</p>

	<p>designed to minimise service charges relating to common and shared space as they affect affordability.</p> <p>Apartment blocks should be tenure specific where possible, or have separate accesses, in order to enable the freehold transfer to an RP.</p>	<p>From a design point of view the SPD would encourage mixed tenure apartment blocks however recognises that this can cause operational issues so does provide for circumstances where single tenure would need to be provided</p>
Kettleburgh Parish Council	<p>All housing should be of an equal standard to be indistinguishable as affordable.</p>	<p>Chapter 7 of the draft SPD provides guidance on achieving ‘tenure blind’ design and also sets out that the Local Plan design policies apply to affordable housing.</p>
Reydon Parish Council (Jordan, Julie)	<p>Affordable housing should be sustainable and low carbon and of the same design quality as market housing. It should be sited throughout a development.</p>	<p>Chapter 7 of the draft SPD states that the sustainable construction policies of the Local Plans apply to affordable housing and also provides guidance on achieving ‘tenure blind’ design. Chapter 7 also contains guidance on appropriate distribution of affordable housing throughout a development.</p>
Trimley St Martin Parish Council (Ley, Caroline)	<p>There should be emphasis on achieving the highest standards of energy efficiency.</p>	<p>Chapter 7 of the draft SPD explains that the sustainable construction policies of the Local Plans will apply to affordable housing. The SPD cannot set greater requirements for energy efficiency than the Local Plans. The Council is also producing a Sustainable Construction SPD which provides further guidance on energy efficiency.</p>

8. Are you aware of any good practice in existing SPDs from elsewhere that could be applied in East Suffolk?

Respondent	Summary of Response	Council Response
Artisan PPS Ltd (Short, Leslie)	No. There should be input from Housing officers at pre-app stage as the scale, type and tenure of affordable housing can be critical to viability appraisal at land acquisition stage.	The draft SPD strongly encourages early engagement between developers and Registered Providers. Advice on housing mix can be provided at pre-application stage.
Bungay Town Council	Goldsmith Street, Norwich referred to as an example to be aspired to.	A photograph of Goldsmith Street in Norwich has been included in the design chapter, Chapter 7.
Felixstowe Town Council (Tadjrishi, Ash)	No	Response noted
Kettleburgh Parish Council	No comment	Response noted
Reydon Parish Council (Jordan, Julie)	No	Response noted

9. Do you have any other comments for us to consider in drafting the Affordable Housing SPD?

Respondent	Summary of Response	Council Response
Home Builders Federation (Behrendt, Mark)	The SPD must be clear that it does not set policy that may be used to refuse an application.	It is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies.
Pigeon Investment Management (Pathfinder Development Consultants)	The SPD should not contain policies. The legal distinction between the SPD and Local Plan should be clearly set out.	It is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The SPD should facilitate rather than introduce additional controls that would hinder the delivery of new homes.	It is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies. The provision of up to date guidance, such as the Model Heads of Terms, are intended to assist with the planning application process.
Park Properties (Pathfinder Development Consultants)	The SPD should facilitate rather than introduce additional controls that would hinder the delivery of new homes.	It is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies. The provision of up to date guidance, such as the Model Heads of Terms, are intended to assist with the planning application process.

Wellington (Pathfinder Development Consultants)	The SPD should facilitate rather than introduce additional controls that would hinder the delivery of new homes.	It is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies. The provision of up to date guidance, such as the Model Heads of Terms, are intended to assist with the planning application process.
Woodbridge Town Council (Mussett, Gordon)	As there is no Local Plan for East Suffolk the SPD may fail to include nuances between the two Local Plans.	The SPD, where relevant, specifically highlights any differences of approach between the two Local Plans and provides guidance accordingly.
Gladman Developments Ltd (Fleming, John)	Request to be kept up to date on progress and future documents. The SPD should not create new policy. It is important that the SPD is flexible and consistent with national policy. It should not restrict development or place onerous requirements on development that may threaten viability. The SPD should be flexible to allow for sites to be discussed and negotiated on a case by case basis.	It is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies.
Home Builders Federation (Behrendt, Mark)	The presentation of the SPD should not lead users to consider that guidance is policy.	We have adopted a template approach to SPD presentation and it is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies.
Pigeon Investment Management (Pathfinder Development Consultants)	The presentation of the SPD should not lead users to consider that guidance is policy.	We have adopted a template approach to SPD presentation and it is explained in the Introduction that the SPD provides guidance on the implementation of existing Local Plan policies.

<p>Hopkins Homes Ltd (Pathfinder Development Consultants)</p>	<p>Consider a workshop with RPs and developers before the SPD is finalised to ensure the document assists with maximising affordable housing delivery.</p>	<p>As part of the initial consultation targeted discussion took place with those who regularly engage with the Council on the preparation of S106 agreements in relation to the drafting of the Model Heads of Terms and Template Clauses that are set out in Appendix 2 of the draft SPD. The public consultation on the draft SPD provides an opportunity for comments to be made on the draft SPD.</p>
<p>Park Properties (Pathfinder Development Consultants)</p>	<p>Consider a workshop with RPs and developers before the SPD is finalised to ensure the document assists with maximising affordable housing delivery.</p>	<p>As part of the initial consultation targeted discussion took place with those who regularly engage with the Council on the preparation of S106 agreements in relation to the drafting of the Model Heads of Terms and Template Clauses that are set out in Appendix 2 of the draft SPD. The public consultation on the draft SPD provides an opportunity for comments to be made on the draft SPD.</p>
<p>Wellington (Pathfinder Development Consultants)</p>	<p>Consider a workshop with RPs and developers before the SPD is finalised to ensure the document assists with maximising affordable housing delivery.</p>	<p>As part of the initial consultation targeted discussion took place with those who regularly engage with the Council on the preparation of S106 agreements in relation to the drafting of the Model Heads of Terms and Template Clauses that are set out in Appendix 2 of the draft SPD. The public consultation on the draft SPD provides an opportunity for comments to be made on the draft SPD.</p>
<p>Pigeon Investment Management (Pathfinder Development Consultants)</p>	<p>Consider a workshop with RPs, developers, land promoters and home builders before the SPD is finalised to ensure the document assists with maximising affordable housing delivery.</p>	<p>As part of the initial consultation targeted discussion took place with those who regularly engage with the Council on the preparation of S106 agreements in relation to the drafting of the Model Heads of Terms and Template Clauses that are set out in Appendix 2 of the draft SPD. The public consultation on</p>

		the draft SPD provides an opportunity for comments to be made on the draft SPD.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The SPD should not add to the definitions in the NPPF, such as by including reference to Local Housing Allowance rates. This places undue risk on RPs and harms scheme viability. S106 should not become overly prescriptive at an early stage, there needs to be flexibility allowing for circumstances to evolve particularly on larger sites. There may also be a mismatch between need and supply. Sufficient mortgage products need to exist for intermediate tenures to work in practice.	<p>The draft SPD provides further explanation of the different tenures of affordable housing, based on the definitions in the NPPF, in Chapter 2 of the draft SPD.</p> <p>The Model Heads of Terms and Template Clauses are intended to set out the Council’s position but the SPD does acknowledge that flexibility may be needed in some cases. The SPD does emphasise early engagement with Registered Providers to ensure that an RP is willing and able to take on the affordable dwellings.</p>
Park Properties (Pathfinder Development Consultants)	The SPD should not add to the definitions in the NPPF, such as by including reference to Local Housing Allowance rates. This places undue risk on RPs and harms scheme viability. S106 should not become overly prescriptive at an early stage, there needs to be flexibility allowing for circumstances to evolve particularly on larger sites. There may also be a mismatch between need and supply. Sufficient mortgage products need to exist for intermediate tenures to work in practice.	<p>The draft SPD provides further explanation of the different tenures of affordable housing, based on the definitions in the NPPF, in Chapter 2 of the draft SPD.</p> <p>The Model Heads of Terms and Template Clauses are intended to set out the Council’s position but the SPD does acknowledge that flexibility may be needed in some cases. The SPD does emphasise early engagement with Registered Providers to ensure that an RP is willing and able to take on the affordable dwellings.</p>
Wellington (Pathfinder Development Consultants)	The SPD should not add to the definitions in the NPPF, such as by including reference to Local Housing Allowance rates. This places undue risk on RPs and harms scheme viability. S106 should not become overly	The draft SPD provides further explanation of the different tenures of affordable housing, based on the definitions in the NPPF, in Chapter 2 of the draft SPD.

	<p>prescriptive at an early stage, there needs to be flexibility allowing for circumstances to evolve particularly on larger sites. There may also be a mismatch between need and supply. Sufficient mortgage products need to exist for intermediate tenures to work in practice.</p>	<p>The Model Heads of Terms and Template Clauses are intended to set out the Council’s position but the SPD does acknowledge that flexibility may be needed in some cases. The SPD does emphasise early engagement with Registered Providers to ensure that an RP is willing and able to take on the affordable dwellings.</p>
<p>Pigeon Investment Management (Pathfinder Development Consultants)</p>	<p>The SPD should not add to the definitions in the NPPF, such as by including reference to Local Housing Allowance rates. This places undue risk on RPs and harms scheme viability. S106 should not become overly prescriptive at an early stage, there needs to be flexibility allowing for circumstances to evolve particularly on larger sites. There may also be a mismatch between need and supply. Sufficient mortgage products need to exist for intermediate tenures to work in practice.</p>	<p>The draft SPD provides further explanation of the different tenures of affordable housing, based on the definitions in the NPPF, in Chapter 2 of the draft SPD.</p> <p>The Model Heads of Terms and Template Clauses are intended to set out the Council’s position but the SPD does acknowledge that flexibility may be needed in some cases. The SPD does emphasise early engagement with Registered Providers to ensure that an RP is willing and able to take on the affordable dwellings.</p>
<p>Artisan PPS Ltd (Leslie Short)</p>	<p>Clarity required on which organisation should sell discounted market housing within the unit numbers defined as affordable</p>	<p>The Government has introduced First Homes in May 2021 as a new tenure of discounted market sale housing and guidance on these has been included in the draft SPD. First Homes are initially sold by the developer – the draft SPD contains a link to the Planning Practice Guidance on First Homes which contains further details.</p>
<p>Westerfield Parish Council (Miller, Peter)</p>	<p>The Fullers Field scheme in Westerfield does not include Shared Ownership or starter home / discounted ownership and would not meet the proportions in the Local Plan. Details of how Shared Ownership will be</p>	<p>The development referred to was granted permission under the former Local Plan. The guidance in the draft SPD sets out when certain details of the affordable housing should be provided. An Affordable Housing Statement should be submitted with a</p>

	<p>applied should be clearly stated at an early stage - if too expensive it will not help those on low incomes. Details of how affordable housing will be provided should be provided before permission is granted - permission should not be granted until these details are included. All applications for more than 10 dwellings should have their full complement of shared ownership and discounted ownership.</p>	<p>planning application and the SPD provides guidance in Chapter 12 on what details should be provided. Applications will be expected to provide a mix of tenures consistent with Policy SCLP5.10 (in the former Suffolk Coastal area), which expects 25% Shared Ownership and 25% discounted home ownership (to be applied as First Homes).</p>
<p>Woodbridge Town Council (Mussett, Gordon)</p>	<p>The SPD should set out the minimum percentage of rented affordable homes to be provided based on a housing needs assessment.</p>	<p>Policies SCLP5.10 and WLP8.2 set out the percentage of affordable rented that would be sought, the SPD is not amending this but providing guidance on how it could be implemented. The guidance on local housing needs assessments in Chapter 8 of the draft SPD sets out guidance on identifying needs in the context of exception sites where the tenure mix is not set out in policy.</p>
<p>Inspired Villages (Pearce, Ellen)</p>	<p>Class C2 is exempt from providing affordable housing. Further clarification should be given on the Council's position regarding class C2. Inspired Villages is responsible for the operation, ownership, management of the site and maintenance of significant communal facilities. communal facilities are around 25% of floorspace. A retirement community is a single planning unit. A document is attached which include recommendations which should be considered. the May 2012 SPD did not require C2 to provide affordable housing.</p>	<p>It has been determined by the courts that Class C2 can include accommodation in the form of dwellings and therefore the Affordable Housing SPD sets out that in these circumstances the policy requirements for affordable housing should be applied. The Local Plan policies do not distinguish between dwellings that are C2 or C3.</p>

<p>Woodbridge Town Council (Mussett, Gordon)</p>	<p>Requirements for affordable housing on specialist housing developments and build to rent developments should be based on local housing need.</p>	<p>The draft SPD provides guidance on specialist housing in Chapter 3 and sets out that needs for affordable specialist housing could be identified through the Gateway to HomeChoice housing register. For Build to Rent developments, Chapter 2 of the draft SPD explains that ownership tenures would not be expected to be provided in accordance with the Planning Practice Guidance on Build to Rent.</p>
<p>Hopkins Homes Ltd (Pathfinder Development Consultants)</p>	<p>Welcome the SPD providing guidance on how an appropriate mix (size and tenure) is to be identified. A developer's knowledge of the market is often more robust. On smaller schemes it is generally only viable to deliver a limited range of house types than to try to meet every need.</p>	<p>The policies in the Local Plans (SCLP5.10 and WLP8.2) do not specify different tenure mixes for different scales of development.</p>
<p>Park Properties (Pathfinder Development Consultants)</p>	<p>Welcome the SPD providing guidance on how an appropriate mix (size and tenure) is to be identified. A developer's knowledge of the market is often more robust. On smaller schemes it is generally only viable to deliver a limited range of house types than to try to meet every need.</p>	<p>The policies in the Local Plans (SCLP5.10 and WLP8.2) do not specify different tenure mixes for different scales of development.</p>
<p>Wellington (Pathfinder Development Consultants)</p>	<p>Welcome the SPD providing guidance on how an appropriate mix (size and tenure) is to be identified. A developer's knowledge of the market is often more robust. On smaller schemes it is generally only viable to deliver a limited range of house types than to try to meet every need.</p>	<p>The policies in the Local Plans (SCLP5.10 and WLP8.2) do not specify different tenure mixes for different scales of development.</p>

<p>Pigeon Investment Management (Pathfinder Development Consultants)</p>	<p>Welcome the SPD providing guidance on how an appropriate mix (size and tenure) is to be identified. A developer’s knowledge of the market is often more robust. On smaller schemes it is generally only viable to deliver a limited range of house types than to try to meet every need.</p>	<p>The policies in the Local Plans (SCLP5.10 and WLP8.2) do not specify different tenure mixes for different scales of development.</p>
<p>Woodbridge Town Council (Mussett, Gordon)</p>	<p>The appropriate mix/tenure should have reference to the town/parish analysis of need not the District-wide analysis.</p>	<p>Policies SCLP5.10 and WLP8.2 reflect the needs identified in the Strategic Housing Market Assessment and it is appropriate for sites to deliver this mix as the sites are contributing to district-wide growth. Reference is also made to the Housing Register, as set out in Chapter 3 of the draft SPD.</p>
<p>Gladman Developments Ltd (Fleming, John)</p>	<p>There should be a flexible approach to enable sites to be considered on a site by site basis.</p>	<p>The policies in the Local Plans (SCLP5.10 and WLP8.2) do not specify different tenure mixes for different scales of development. The draft SPD recognises the role of different sources of information on need, such as the Housing Register, within the context of the tenure mixes set out in the policies.</p>
<p>Great Bealings Parish Council (Dee Knights)</p>	<p>A mix of tenures is understood as is the potential for self build.</p>	<p>Comment noted. Guidance on affordable self and custom build is set out in Chapter 2 of the draft SPD.</p>
<p>Hagar Babbington Esquire</p>	<p>It would be good to have more self builds to enhance the local area and to be eco friendly</p>	<p>Guidance on affordable self and custom build is set out in Chapter 2 of the draft SPD.</p>
<p>Hopkins Homes Ltd (Pathfinder Development Consultants)</p>	<p>Entry level exception sites should be covered.</p>	<p>Reference to entry level exception sites is included in Chapter 6 of the draft SPD, covering exception sites.</p>

Park Properties (Pathfinder Development Consultants)	Entry level exception sites should be covered.	Reference to entry level exception sites is included in Chapter 6 of the draft SPD, covering exception sites.
Wellington (Pathfinder Development Consultants)	Entry level exception sites should be covered.	Reference to entry level exception sites is included in Chapter 6 of the draft SPD, covering exception sites.
Pigeon Investment Management (Pathfinder Development Consultants)	Entry level exception sites should be covered.	Reference to entry level exception sites is included in Chapter 6 of the draft SPD, covering exception sites.
Hopkins Homes Ltd (Pathfinder Development Consultants)	Inclusion of market housing to bring forward rural exception sites to be covered	Chapter 6 of the draft SPD, related to exception sites, contains guidance in relation to the circumstances in which market housing may form part of the housing mix on an exception site.
Park Properties (Pathfinder Development Consultants)	Inclusion of market housing to bring forward rural exception sites to be covered	Chapter 6 of the draft SPD, related to exception sites, contains guidance in relation to the circumstances in which market housing may form part of the housing mix on an exception site.
Wellington (Pathfinder Development Consultants)	Inclusion of market housing to bring forward rural exception sites to be covered	Chapter 6 of the draft SPD, related to exception sites, contains guidance in relation to the circumstances in which market housing may form part of the housing mix on an exception site.

<p>Pigeon Investment Management (Pathfinder Development Consultants)</p>	<p>Inclusion of market housing to bring forward rural exception sites to be covered</p>	<p>Chapter 6 of the draft SPD, related to exception sites, contains guidance in relation to the circumstances in which market housing may form part of the housing mix on an exception site.</p>
<p>Hopkins Homes Ltd (Pathfinder Development Consultants)</p>	<p>Staircasing on intermediate housing should be covered</p>	<p>Staircasing is covered in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD.</p>
<p>Park Properties (Pathfinder Development Consultants)</p>	<p>Staircasing on intermediate housing should be covered</p>	<p>Staircasing is covered in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD.</p>
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<p>Pigeon Investment Management (Pathfinder Development Consultants)</p>	<p>Staircasing on intermediate housing should be covered</p>	<p>Staircasing is covered in the draft Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD.</p>
<p>Westerfield Parish Council (Miller, Peter)</p>	<p>Greater effort should be made to ensure the precise details of ownership of affordable housing is laid out in the planning application.</p>	<p>The draft SPD encourages developers to engage with Registered Providers at an early stage. It is expected that an Affordable Housing Statement will be submitted with a planning application</p>

		and that this will provide details of the proposed affordable housing (see Chapter 12 of the draft SPD).
Gladman Developments Ltd (Fleming, John)	Whilst model Heads of Terms may be useful, the SPD will need to be flexible so that specific issues can be discussed and negotiated on a site by site basis as all schemes vary.	Chapter 4 on Section 106 agreements acknowledges that there may be circumstances where flexibility will need to be provided in relation to the Model Heads of Terms and Template Clauses, however these are the starting point and provide clarity on the Council's expectations.
Woodbridge Town Council (Mussett, Gordon)	Support inclusion of model Heads of Terms but there should be Town/Parish Council involvement in developing alternatives if specific and exceptional circumstances dictate.	Town and Parish Councils are able to respond to consultations on planning applications and this could in turn inform the S106 agreement where appropriate.
Westerfield Parish Council (Miller, Peter)	Consideration should be given to the inclusion of model clauses for S106 agreements.	Template Clauses are included – see Chapter 6 and Appendix 2 of the draft SPD.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The appropriate trigger point for transfer to an RP should be no less than 50% of open market homes being occupied, with further triggers on larger sites. Phasing should ensure affordable housing delivery is proportionate to market housing delivery. Site specific flexibility is necessary.	The Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD set out a trigger point of 60% occupation of market housing, and an option for this to be staggered where sufficient justification is provided.
Park Properties (Pathfinder Development Consultants)	The appropriate trigger point for transfer to an RP should be no less than 50% of open market homes being occupied, with further triggers on larger sites. Phasing should ensure affordable housing delivery is proportionate to market housing delivery. Site specific flexibility is necessary.	The Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD set out a trigger point of 60% occupation of market housing, and an option for this to be staggered where sufficient justification is provided.

Wellington (Pathfinder Development Consultants)	The appropriate trigger point for transfer to an RP should be no less than 50% of open market homes being occupied, with further triggers on larger sites. Phasing should ensure affordable housing delivery is proportionate to market housing delivery. Site specific flexibility is necessary.	The Model Heads of Terms and Template Clauses in Appendix 2 of the draft SPD set out a trigger point of 60% occupation of market housing, and an option for this to be staggered where sufficient justification is provided.
Peninsula Villages Community Land Trust (Brown, Jenny)	S106 agreements should recognise that community led housing organisations can deliver affordable housing	This is recognised in the draft Model Heads of Terms and Template Clauses in Appendix 2.
Great Bealings Parish Council (Knights, Dee)	A S106 would need to secure housing to meet local needs	The draft Model Heads of Terms in Appendix 2 refer to the local connection cascade which recognises local connections as a priority.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The S106 should allow for amendments to the Affordable Housing Scheme by agreement between the council and developer to allow for flexibility e.g. with house types.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Park Properties (Pathfinder Development Consultants)	The S106 should allow for amendments to the Affordable Housing Scheme by agreement between the council and developer to allow for flexibility e.g. with house types.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.

Wellington (Pathfinder Development Consultants)	The S106 should allow for amendments to the Affordable Housing Scheme by agreement between the council and developer to allow for flexibility e.g. with house types.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Pigeon Investment Management (Pathfinder Development Consultants)	The S106 should allow for amendments to the Affordable Housing Scheme by agreement between the council and developer to allow for flexibility e.g. with house types.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The SPD should not go beyond the Council's allocations policy for rented housing - this can reduce interest from RPs due to concerns about void times and demand. For intermediate housing it is more important to list criteria such as income, district connection and the seller should satisfy themselves the criteria have been met.	The allocations policy remains outside of the SPD. A local connections cascade is set out in the draft Model Heads of Terms and Template Clauses, and for intermediate housing this refers to a connection with East Suffolk.
Park Properties (Pathfinder Development Consultants)	The SPD should not go beyond the Council's allocations policy for rented housing - this can reduce interest from RPs due to concerns about void times and demand. For intermediate housing it is more important to list criteria such as income, district connection and the seller should satisfy themselves the criteria have been met.	The allocations policy remains outside of the SPD. A local connections cascade is set out in the draft Model Heads of Terms and Template Clauses, and for intermediate housing this refers to a connection with East Suffolk.
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	such as income, district connection and the seller should satisfy themselves the criteria have been met.	
Pigeon Investment Management (Pathfinder Development Consultants)	The SPD should not go beyond the Council's allocations policy for rented housing - this can reduce interest from RPs due to concerns about void times and demand. For intermediate housing it is more important to list criteria such as income, district connection and the seller should satisfy themselves the criteria have been met.	The allocations policy remains outside of the SPD. A local connections cascade is set out in the draft Model Heads of Terms and Template Clauses, and for intermediate housing this refers to a connection with East Suffolk.
Gladman Developments Ltd (Fleming, John)	Support the inclusion of advice on the circumstances when a commuted sum may be payable and how this will be determined. This will enable costs to be calculated in the early stages.	Response noted.
Woodbridge Town Council (Mussett, Gordon)	The SPD should set out the Council's approach to spending commuted sums. It is unacceptable for a commuted sum to be spent miles away.	The SPD sets out that to ensure that suitable options for spending commuted sums can be identified, commuted sums will usually be able to be spent across East Suffolk. This provides greater opportunities for pooling sums and being able to take advantage of opportunities which arise, and minimises the risk of sums having to be refunded. The approach to spending will be set out outside the SPD in the Council's commuted sums spending policy which is currently under preparation.
Peninsula Villages Community Land Trust (Jenny Brown)	The SPD should note that, whenever possible, commuted sums drawn from new development in rural areas should be used to address local housing need in that immediate, rural area.	The SPD sets out that to ensure that suitable options for spending commuted sums can be identified, commuted sums will usually be able to be spent across East Suffolk. This provides greater opportunities for pooling sums and being able to take advantage of opportunities which arise, and minimises

		the risk of sums having to be refunded. The approach to spending will be set out outside the SPD in the Council's commuted sums spending policy which is currently under preparation.
Hopkins Homes Ltd (Pathfinder Development Consultants)	The SPD should explain how contributions will be calculated e.g. a simple formula based on open market value, net of sales costs, less anticipated RP offer prices. Affordable housing under 5 units and apartment scheme are examples where commuted sums may be more sensible, or where there are high service or maintenance costs.	Chapter 5 of the draft SPD provides guidance on calculating commuted sums. The Council separately publishes the commuted sum values and updates these regularly. These are published at Former Suffolk Coastal area Section 106 » East Suffolk Council and Former Waveney area Section 106 » East Suffolk Council.
Park Properties (Pathfinder Development Consultants)	The SPD should explain how contributions will be calculated e.g. a simple formula based on open market value, net of sales costs, less anticipated RP offer prices. Affordable housing under 5 units and apartment scheme are examples where commuted sums may be more sensible, or where there are high service or maintenance costs.	Chapter 5 of the draft SPD provides guidance on calculating commuted sums. The Council separately publishes the commuted sum values and updates these regularly. These are published at Former Suffolk Coastal area Section 106 » East Suffolk Council and Former Waveney area Section 106 » East Suffolk Council.
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<p>Woodbridge Town Council (Mussett, Gordon)</p>	<p>Given the current economic circumstances whereby developers may wish to reduce their contributions, should policies SCLP5.10 and WLP8.2 be strengthened?</p>	<p>The SPD cannot amend the requirements of the Local Plan policies.</p>
<p>Gladman Developments Ltd (Fleming, John)</p>	<p>The SPD should cross reference the requirements of SCLP5.10 and WLP8.2 or subsequent policies. The Council should seek to secure the maximum level of affordable housing that would not adversely affect viability, in particular in lower value areas.</p>	<p>The policy requirements have been viability tested as part of the production of the Local Plans. Policy WLP8.2 sets out different requirements for different value areas. Chapter 9 of the draft SPD clarifies that a lower amount or different tenure mix rather than zero provision would be preferred.</p>
<p>Home Builders Federation (Behrendt, Mark)</p>	<p>The HBF Local Plan Viability Guidance note is attached with the response. This sets out a number of 'concerns' to the approach taken to viability assessments in Local Plans.</p>	<p>The Local Plans have been subject to Whole Plan Viability Assessment and have been Examined and found to be 'sound'.</p>
<p>Hopkins Homes Ltd (Pathfinder Development Consultants)</p>	<p>The necessary steps where a 'variation' to the requirement is sought should be as simple and timely as possible to facilitate scheme delivery.</p>	<p>The guidance in the SPD is clear that variations would be in exceptional circumstances and that this would be rigorously assessed. Chapter 9 of the draft SPD clarifies that a lower amount or different tenure mix rather than zero provision would be preferred. Guidance on undertaking viability</p>

		assessments is also set out in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan.
Park Properties (Pathfinder Development Consultants)	The necessary steps where a 'variation' to the requirement is sought should be as simple and timely as possible to facilitate scheme delivery.	The guidance in the SPD is clear that variations would be in exceptional circumstances and that this would be rigorously assessed. Chapter 9 of the draft SPD clarifies that a lower amount or different tenure mix rather than zero provision would be preferred. Guidance on undertaking viability assessments is also set out in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan.
Wellington (Pathfinder Development Consultants)	The necessary steps where a 'variation' to the requirement is sought should be as simple and timely as possible to facilitate scheme delivery.	The guidance in the SPD is clear that variations would be in exceptional circumstances and that this would be rigorously assessed. Chapter 9 of the draft SPD clarifies that a lower amount or different tenure mix rather than zero provision would be preferred. Guidance on undertaking viability assessments is also set out in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan.
Home Builders Federation (Behrendt, Mark)	Disagrees with the interpretation of national guidance on the implementation of vacant buildings credit presented in the Council's Vacant Building Credit Advice Note and with the Council's position that the CIL Regulations guidance on how to determine whether a building is vacant can be used for this purpose. The requirement for it to have been not in continuous use for a period of 6 months or more over a 3 year period is not consistent with the guidance. The term vacant	The Planning Practice Guidance on Planning Obligations sets out that the vacant buildings credit policy is intended to incentivise brownfield development and that local planning authorities should have regard to that intention. Applying the policy to any building not currently in use could therefore result in buildings becoming vacant to benefit from the policy which would be contrary to the Government's aims.

	should be applied to any building that is currently not occupied.	
Pigeon Investment Management (Pathfinder Development Consultants)	Bringing the existing guidance note into the SPD is to be welcomed. The Council should not use the CIL definition of vacant as this is not covered in the PPG. The term vacant should be applied to any building that is currently not occupied. The requirement for it to not have been in continuous use for a period of 6 months or more over a 3 year period is not consistent with guidance.	The Planning Practice Guidance on Planning Obligations sets out that the vacant buildings credit policy is intended to incentivise brownfield development and that local planning authorities should have regard to that intention. Applying the policy to any building not currently in use could therefore result in buildings becoming vacant to benefit from the policy which would be contrary to the Government's aims.
Woodbridge Town Council (Gordon Mussett)	The SPD should include the footnote to paragraph 63 of the NPPF which states 'Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned.'	The SPD explains the national policy and cross refers to paragraph 63 of the NPPF.
Hopkins Homes Ltd (Pathfinder Development Consultants)	Bringing the existing guidance note into the SPD is to be welcomed.	Comment noted.
Park Properties (Pathfinder Development Consultants)	Bringing the existing guidance note into the SPD is to be welcomed.	Comment noted.
Wellington (Pathfinder)	Bringing the existing guidance note into the SPD is to be welcomed.	Comment noted.

Development Consultants)		
Hopkins Homes Ltd (Pathfinder Development Consultants)	All properties should achieve minimum sizes and standards acceptable to RPs but not additional requirements that have not been tested through whole plan viability. Nationally Described Space Standards should not be required - most RPs do not look for this. It may lead to fewer affordable homes being delivered.	Chapter 7 encourages reference to the Nationally Described Space Standards but does not require these to be met, noting that they are not a requirement of policy.
Park Properties (Pathfinder Development Consultants)	All properties should achieve minimum sizes and standards acceptable to RPs but not additional requirements that have not been tested through whole plan viability. Nationally Described Space Standards should not be required - most RPs do not look for this. It may lead to fewer affordable homes being delivered.	Chapter 7 encourages reference to the Nationally Described Space Standards but does not require these to be met, noting that they are not a requirement of policy.
Wellington (Pathfinder Development Consultants)	All properties should achieve minimum sizes and standards acceptable to RPs but not additional requirements that have not been tested through whole plan viability. Nationally Described Space Standards should not be required - most RPs do not look for this. It may lead to fewer affordable homes being delivered.	Chapter 7 encourages reference to the Nationally Described Space Standards but does not require these to be met, noting that they are not a requirement of policy.
Woodbridge Town Council (Mussett, Gordon)	Affordable housing should be designed to meet the highest thermal insulation rating as lower income families are disproportionately affected by energy costs. Alternative heating methods such as ground source heat pumps should be used.	It is not possible for the SPD to set new policy, however Chapter 7 on design sets out that the sustainable construction policies of the Local Plans apply to affordable housing.

<p>Felixstowe Town Council (Tadjrishi, Ash)</p>	<p>The SPD should include guidance on ensuring a proportion of affordable homes are accessible for those with disabilities.</p>	<p>Policy SCLP5.8 and Policy WLP8.31 require at least 50% and at least 40% respectively of dwellings on sites of 10 or more dwellings to be constructed to accessible and adaptable home standards under Part M4(2) of the Building Regulations. Chapter 7 and Chapter 3 of the draft SPD expect that a proportion of the required accessible and adaptable dwellings should be within the affordable tenure.</p>
<p>Suffolk Coastal Disability Forum (Morris, Margaret)</p>	<p>The respondent suggests the AH SPD includes guidance on ensuring a proportion of affordable homes are accessible for those with disabilities.</p>	<p>Policy SCLP5.8 and Policy WLP8.31 require at least 50% and at least 40% respectively of dwellings on sites of 10 or more dwellings to be constructed to accessible and adaptable home standards under Part M4(2) of the Building Regulations. Chapter 7 and Chapter 3 of the Draft SPD expect that a proportion of the required accessible and adaptable dwellings should be within the affordable tenure.</p>
<p>Woodbridge Town Council (Mussett, Gordon)</p>	<p>There should be a requirement that affordable housing is linked to existing public footpaths or cycleways and that there should be a developer contribution to enable this.</p>	<p>Chapter 7 of the draft SPD sets out that affordable dwellings should have consistent access to sustainable transport infrastructure (including walking and cycling) as part of the guidance on securing tenure blind design.</p>
<p>Hagar Babbington Esquire</p>	<p>A lasting legacy should be left for future generations and should work with nature – a link to a case study is provided.</p>	<p>Response noted. The Council is also preparing a Sustainable Construction Supplementary Planning Document which includes guidance on integrating measures to support biodiversity.</p>
<p>Peninsula Villages Community Land Trust</p>	<p>Community based housing needs surveys/knowledge should be included.</p>	<p>Chapter 8 of the draft SPD contains guidance on undertaking local housing needs surveys.</p>

(Brown, Jenny)		
Woodbridge Town Council (Mussett, Gordon)	The Strategic Housing Market Assessment is now some years old and due to time and Covid should be re-assessed.	The SHMA underpins the Local Plan policies and therefore it is not appropriate to revisit it until the next Local Plan review. However, the policies acknowledge the role for local assessments of housing need. The purpose and role of the SHMA in informing the mix of affordable housing is set out in Chapter 3.
Great Bealings Parish Council (Knights, Dee)	A Housing Needs Survey was carried out in 2014 which identified a need for 3 units although none have come forward. The Neighbourhood Plan sets out how a proposal would be assessed and requires it to be consulted on separately and subject to same design as other developments. The community is too small to support specialist housing and therefore a small scheme of 1-3 units is most likely. The question of commuted sums is unlikely to arise.	Guidance is provided on undertaking local housing needs assessments in Chapter 8 of the draft SPD.
Hopkins Homes Ltd (Pathfinder Development Consultants)	Where existing sufficient evidence exists there should not be a need for further surveys.	Guidance is provided on undertaking local housing needs assessments in Chapter 8 of the draft SPD. The guidance states that the data should be up to date when a planning application is submitted and this would be data that has been gathered in the last five years.
Park Properties (Pathfinder Development Consultants)	Where existing sufficient evidence exists there should not be a need for further surveys.	Guidance is provided on undertaking local housing needs assessments in Chapter 8 of the draft SPD. The guidance states that the data should be up to date when a planning application

		is submitted and this would be data that has been gathered in the last five years.
Wellington (Pathfinder Development Consultants)	Where existing sufficient evidence exists there should not be a need for further surveys.	Guidance is provided on undertaking local housing needs assessments in Chapter 8 of the draft SPD. The guidance states that the data should be up to date when a planning application is submitted and this would be data that has been gathered in the last five years.
Pigeon Investment Management (Pathfinder Development Consultants)	Where existing sufficient evidence exists there should not be a need for further surveys.	Guidance is provided on undertaking local housing needs assessments in Chapter 8 of the draft SPD. The guidance states that the data should be up to date when a planning application is submitted and this would be data that has been gathered in the last five years.
Woodbridge Town Council (Mussett, Gordon)	The SPD should include guidance on how frequently local housing needs surveys are undertaken.	The guidance in Chapter 8 of the draft SPD states that the data should be up to date when a planning application is submitted and this would be data that has been gathered in the last five years. However there would be no requirement from a planning point of view to undertake a survey at set periods of time as a survey would be done to inform an affordable housing proposal.
Kettleburgh Parish Council	There should be a way for small villages to protect themselves from one type of housing. There should not be over development of exception sites which would create a burden on services and infrastructure. There should be a mechanism that limits granting of exception sites where allocations have already been made.	Policy SCLP5.11 sets out that exception sites would be supported where the needs cannot be met through existing allocations. Policy SCLP5.11 also sets out the exception sites would be responding to an identified local need and the policy also includes a criterion relating to the location, scale and design of affordable housing retaining and enhancing the character and

		setting of a settlement. It is not therefore anticipated that numerous exception sites would come forward in one location.
Artisan PPS Ltd (Short, Leslie)	Clarity required as to which forms of affordable housing are eligible for social housing relief.	Chapter 11 of the draft SPD cross refers to the Council's Discretionary Social Housing Relief Policy which sets out which forms of affordable housing are eligible for relief.
Hopkins Homes Ltd (Pathfinder Development Consultants)	Welcome provision of advice on how the Discretionary Affordable Housing Relief for CIL will be provided.	Response noted.
Park Properties (Pathfinder Development Consultants)	Welcome provision of advice on how the Discretionary Affordable Housing Relief for CIL will be provided.	Response noted.
Wellington (Pathfinder Development Consultants)	Welcome provision of advice on how the Discretionary Affordable Housing Relief for CIL will be provided.	Response noted.
Pigeon Investment Management (Pathfinder Development Consultants)	Welcome provision of advice on how the Discretionary Affordable Housing Relief for CIL will be provided.	Response noted.
Great Bealings Parish Council (Knights, Dee)	What impact will the SPD have on made Neighbourhood Plans?	The SPD explains that the guidance in the SPD may also be relevant to the implementation of Neighbourhood Plan policies that relate to affordable housing.

<p>Peninsula Villages Community Land Trust (Brown, Jenny)</p>	<p>The SPD could introduce the idea of ESC and CLTs working together in an integrated manner.</p>	<p>Whilst the way of working with CLTs sits largely outside the SPD as a planning document, reference has been included in the SPD to the role of Community Land Trusts.</p>
<p>Peninsula Villages Community Land Trust (Brown, Jenny)</p>	<p>Housing Associations and other providers should be encouraged to buy back ex Council houses when they become available</p>	<p>This is beyond the role of the SPD. The Council’s Housing Development Strategy sets out that the Council may acquire existing dwellings where this would provide a value for money option and meet an identified need (see Housing Development Strategy - Report - Page 13 (paperturn-view.com)).</p>
<p>Woodbridge Town Council (Mussett, Gordon)</p>	<p>The current economy is a barrier to raising entry level deposits and affects the financial viability of schemes thereby reducing the number of affordable units being built.</p>	<p>Chapter 9 of the draft SPD sets out sets out that reductions in the amount of affordable housing being provided should only take place in exceptional circumstances and that this would need to be demonstrated to the Council’s satisfaction through a viability assessment. Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan set out the requirements for undertaking viability assessments.</p>
<p>Gladman Developments Ltd (John Fleming)</p>	<p>The SPD should cross reference the requirements of SCLP5.10 and WLP8.2 or subsequent policies. The Council should seek to secure the maximum level of affordable housing that would not adversely affect viability, in particular in lower value areas.</p>	<p>The SPD cannot predict requirements of future policies. Chapter 9 of the draft SPD sets out sets out that reductions in the amount of affordable housing being provided should only take place in exceptional circumstances and that this would need to be demonstrated to the Council’s satisfaction through a viability assessment. Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan set out the requirements for undertaking viability assessments.</p>

Hopkins Homes Ltd (Pathfinder Development Consultants)	Caution involving RPs too early as their investment strategies may change. Local circumstances may evolve between pre-app and delivery which can be particularly problematic on larger schemes and there should therefore be flexibility.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Park Properties (Pathfinder Development Consultants)	Caution involving RPs too early as their investment strategies may change. Local circumstances may evolve between pre-app and delivery which can be particularly problematic on larger schemes and there should therefore be flexibility.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Wellington (Pathfinder Development Consultants)	Caution involving RPs too early as their investment strategies may change. Local circumstances may evolve between pre-app and delivery which can be particularly problematic on larger schemes and there should therefore be flexibility.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Pigeon Investment Management (Pathfinder Development Consultants)	Caution involving RPs too early as their investment strategies may change. Local circumstances may evolve between pre-app and delivery which can be particularly problematic on larger schemes and there should therefore be flexibility.	Chapter 4 of the draft SPD encourages early engagement with Registered Providers to reduce the risk of changes being made later on.
Hopkins Homes Ltd (Pathfinder Development Consultants)	Maintenance of a regular delivery register of affordable housing should be covered.	This is not something that would be covered in an SPD

Park Properties (Pathfinder Development Consultants)	Maintenance of a regular delivery register of affordable housing should be covered.	This is not something that would be covered in an SPD
Wellington (Pathfinder Development Consultants)	Maintenance of a regular delivery register of affordable housing should be covered.	This is not something that would be covered in an SPD
Pigeon Investment Management (Pathfinder Development Consultants)	Maintenance of a regular delivery register of affordable housing should be covered.	This is not something that would be covered in an SPD
Hopkins Homes Ltd (Pathfinder Development Consultants)	SPD should be clear that affordable housing is not required on sites not classed as major development	Chapter 3 of the SPD sets out the thresholds above which affordable housing is required.
Park Properties (Pathfinder Development Consultants)	SPD should be clear that affordable housing is not required on sites not classed as major development	Chapter 3 of the SPD sets out the thresholds above which affordable housing is required.
Wellington (Pathfinder Development Consultants)	SPD should be clear that affordable housing is not required on sites not classed as major development	Chapter 3 of the SPD sets out the thresholds above which affordable housing is required.

Pigeon Investment Management (Pathfinder Development Consultants)	SPD should be clear that affordable housing is not required on sites not classed as major development	Chapter 3 of the SPD sets out the thresholds above which affordable housing is required.
Hopkins Homes Ltd (Pathfinder Development Consultants)	Policy level of affordable housing should not be required through S106 on schemes brought forward entirely as affordable housing by RPs as this would jeopardise Homes England funding.	Policy SCLP5.10 and Policy WLP8.2 are aimed at securing affordable housing as part of market housing developments.
Park Properties (Pathfinder Development Consultants)	Policy level of affordable housing should not be required through S106 on schemes brought forward entirely as affordable housing by RPs as this would jeopardise Homes England funding.	Policy SCLP5.10 and Policy WLP8.2 are aimed at securing affordable housing as part of market housing developments.
Wellington (Pathfinder Development Consultants)	Policy level of affordable housing should not be required through S106 on schemes brought forward entirely as affordable housing by RPs as this would jeopardise Homes England funding.	Policy SCLP5.10 and Policy WLP8.2 are aimed at securing affordable housing as part of market housing developments.
Pigeon Investment Management (Pathfinder Development Consultants)	Policy level of affordable housing should not be required through S106 on schemes brought forward entirely as affordable housing by RPs as this would jeopardise Homes England funding.	Policy SCLP5.10 and Policy WLP8.2 are aimed at securing affordable housing as part of market housing developments.
Hopkins Homes Ltd (Pathfinder	Monitoring and enforcing subsidy recycling is difficult. They are often not practical if relatively small receipts	Comment noted.

Development Consultants)	are received. This has been dealt with elsewhere through relationships between Councils and RPs.	
Park Properties (Pathfinder Development Consultants)	Monitoring and enforcing subsidy recycling is difficult. They are often not practical if relatively small receipts are received. This has been dealt with elsewhere through relationships between Councils and RPs.	Comment noted.
Wellington (Pathfinder Development Consultants)	Monitoring and enforcing subsidy recycling is difficult. They are often not practical if relatively small receipts are received. This has been dealt with elsewhere through relationships between Councils and RPs.	Comment noted.
Pigeon Investment Management (Pathfinder Development Consultants)	Monitoring and enforcing subsidy recycling is difficult. They are often not practical if relatively small receipts are received. This has been dealt with elsewhere through relationships between Councils and RPs.	Comment noted.
Reydon Parish Council (Jordan, Julie)	The innovative policies being proposed in the draft Southwold Neighbourhood Plan for community led affordable housing schemes should be considered for use across ESC	Such policies could only be introduced through a Local Plan or Neighbourhood Plan and not an SPD.
Southwold Town council (Jeans, Jessica)	The SPD should encourage and support flexibility in the allocations policy to enable CLH groups to achieve their goals, CLH viability studies, collaboration between a developer and a CLH where the CLH discharges the S106 obligation in return for land and other compensation. Attached a document on viability in community led	The draft Model Heads of Terms in Appendix 2 refers to the role of Community Led Housing groups in S106 affordable housing.

	housing which shows the different models. The draft Neighbourhood Plan policies are also attached.	
Bungay Town Council	Converting empty high street shops into homes.	Response noted however the Affordable Housing SPD focuses on providing guidance to support the implementation of Local Plan policies on affordable housing.
Inspired Villages (Ellen Pearce)	A Local Plan representation is attached which discusses specialist housing for older people and use classes (C2 and C3) and this should inform the preparation of the SPD.	The information submitted is noted. It has been determined by the courts that Class C2 can include accommodation in the form of dwellings and therefore the Affordable Housing SPD sets out that in these circumstances the policy requirements for affordable housing should be applied. The Local Plan policies do not distinguish between dwellings that are C2 or C3.

Appendix 3 – Initial Consultation – Model Heads of Terms and Template Clauses

Summary of matters raised through first virtual roundtable (8th December 2020)

Agenda topics:

- Planning Application stage – submission of information
- Registered Providers – engagement / timing
- Occupation of affordable housing
- Build standards
- Local connections
- Mortgagee in Possession clause
- Nomination agreements
- Shared equity and discounted sale
- Any other issues

The session was attended by developers, Registered Providers and legal representatives.

Summary of matter raised	How the matter has been addressed
General	
Provision of Model Heads of Terms and Template Clauses generally supported	Noted – these have been progressed and included in the Draft SPD
There should also be flexibility, including to avoid the need for deeds of variation.	Chapter 4 of the Draft SPD recognises that there will be instances where flexibility is needed, however the Model Heads of Terms and Template Clauses set out the Council’s position.
Renegotiation can be needed if a Registered Provider changes or their circumstances change	The draft SPD encourages early engagement with Registered Providers with a view to reducing the need for changes later on.
An issue with the process is knowing who to speak to	The Council provides contact details on its website for the Section 106 team.
Role of Registered Providers	
The benefits of early engagement with Registered Providers were acknowledged however concern was also raised about tying an RP in too early as needs and funding may change. Early engagement rather than early agreement was considered more feasible.	The draft SPD encourages early engagement with Registered Providers. The draft Model Heads of Terms and Template Clauses also provide for circumstances whereby a contract with an RP may not be possible by the 40% trigger point, through the inclusion of ‘unless otherwise agree in writing’ (template covenant 3)
The NPPF seeks to avoid the use of pre-commencement conditions and requiring RPs	The draft Model Heads of Terms and Template Clauses sets a trigger of 40% occupation of

to have to be signed up pre-commencement can create barriers.	market dwellings by which point it is required that a contract is entered into with an RP unless otherwise agreed in writing (template covenant 3)
Registered Provider finances can change quickly and Registered Providers may not therefore be in a position to commit early on.	The draft Model Heads of Terms and Template Clauses sets a trigger of 40% occupation of market dwellings by which point it is required that a contract is entered into with an RP unless otherwise agreed in writing (template covenant 3)
Occupation of Affordable Housing	
It is best for clusters of affordable housing to be developed for financial reasons and also for Registered Providers from a maintenance point of view.	Whilst smaller clusters are preferred in terms of planning objectives, operational matters for Registered Providers are also acknowledged and Chapter 7 on Design refers to clusters being proportionate and that up to ten is generally preferred.
It was agreed that guidance on phasing is needed.	Phasing is covered in the draft Model Heads of Terms and Template Clauses.
Trigger points are specific to the site and it may not be appropriate to standardise this.	The draft Model Heads of Terms and Template Clauses provide for phasing of transfer of affordable housing where justification for this is provided.
Consideration should be given to health safety (i.e. residents living on a building site) in relation to triggers.	This is acknowledged, however it is expected that by setting out Model Heads of Terms developers will be aware of likely trigger points when planning the development.
Build standards	
Registered Providers commented that the main issue with build standards is the size of properties offered. Market units tend to have spare rooms which isn't the case for affordable housing.	Chapter 7 on design sets out that the size of affordable dwellings should be comparable to market dwellings but should also take into account the way in which affordable housing is occupied (for example that a two bedroom home should be able to accommodate four people).
It was noted that sub-standard units have been turned down.	Noted. Chapter 7 on design seeks to ensure that the design of affordable housing would be appropriate for Registered Providers and the SPD also encourages early engagement with Registered Providers with a view to ensuring that a Registered Provider will wish to take up the affordable properties.
It was stated that as well as sizing the internal layouts also need to be sensible to enable a Registered Provider to take the units on.	Guidance on the design of internal layouts is covered in Chapter 7 of the draft SPD.
Maintenance costs are also a consideration, for example flat roofs likely to be turned down.	The SPD encourages early engagement with Registered Providers with a view to ensuring

	that a Registered Provider will wish to take up the affordable properties.
Shared drives not an issue as long as the ownership and responsibility is clearly agreed.	Comment noted.
It was stated that blocks of flats with some affordable units distributed within do not work from a maintenance contract perspective.	This is noted however the Council would not wish to rule out mixed tenure blocks. Chapter 7 of the draft SPD therefore supports mixed tenure blocks however also notes that there may be circumstances where this is not feasible for operational reasons.
Concern was raised over service charges and maintenance costs which can impact on the affordability of a property and impact on whether they would be taken on by Registered Providers. All charges should be looked at in the round.	This would need to be considered alongside the design guidance contained in Chapter 7 which seeks to ensure that affordable housing is visually integrated into a development.
It was suggested that communal areas could be designed out to keep cost down.	This would need to be considered alongside the design guidance contained in Chapter 7 which seeks to ensure that affordable housing is visually integrated into a development.
It was stated that East Suffolk has few Registered Providers operating in it.	Comment noted.
Local Connections	
It was stated that the local connections cascade process should be clear in function and timescale.	A local connections cascade has been included in the draft Model Heads of Terms and Template Clauses and would be applied unless otherwise agreed.
Local connection policies can be affected by markets which change over time.	A local connections cascade has been included however the draft Model Heads of Terms provide for an alternative approach to be agreed.
It was suggested that the degree of housing need someone is in should be given greater weight than the locality of the property. Properties should not be left vacant because no one with a local connection can be found.	A local connections cascade has been included however the draft Model Heads of Terms provide for an alternative approach to be agreed.
It was suggested that timescales should begin from when a property is marketed not from when it is completed.	The local connections cascade in the draft Model Heads of Terms and Template Clauses in relation to affordable dwellings for sale refers to marketing, not completion.
Organising a sale can take a long time whereas renting a property to a tenant can take place relatively quickly.	The local connections cascade in the draft Model Heads of Terms and Template Clauses in relation to affordable dwellings for sale refers to marketing, not completion.
It was considered that there should be tenure specific nominations agreements and cascades.	Separate local connection cascades are set out for rental and purchase affordable housing in

	the draft Model Heads of Terms and Template Clauses.
It was stated that there needs to be agreement on when the trigger point should be within a build project for the Nominations Agreement to be signed.	The draft Model Heads of Terms and Template Clauses set out that the affordable housing shall not be occupied until the Registered Provider has entered into a Nomination Agreement with the Council.
It was stated that the Nominations Agreement and the nature of the local connections criteria need to be understood early on as these affect pricing for bids.	The Model Heads of Terms and Template Clauses set out the Council’s position. The SPD encourages early engagement between developers and Registered Providers.
It was suggested that there should be a radius system used for sites close to the edge of East Suffolk.	For rental properties the local connections cascade refers to a distance from the site (in the second tier of the cascade).
Mortgagee in Possession clauses	
It was stated that a key issue is that lenders often ‘change their goalposts’. The National Housing Federation version was mentioned as acceptable.	The Council anticipates a mortgagee protection clause being published by the Government as part of its template planning obligations associated with First Homes.
It was stated that the timescale for disposal is a comment reason for a deed of variation as most banks won’t accept a period of more than 3 months.	The Council anticipates a mortgagee protection clause being published by the Government as part of its template planning obligations associated with First Homes.
Shared equity and discounted sale	
It was stated that East Suffolk Council’s Section 106 agreements are often silent on allocation and eligibility of shared equity properties.	The Draft Model Heads of Terms and Template Clauses set out a local connections cascade that applies to ownership tenures.
There was concern that the Council may not have the resources to confirm eligibility for resale.	It is not expected that the Council would undertake the verification, however the Council is anticipating a prescribed procedure in relation to First Homes.
It was noted that different developers have different views on shared equity when compared with shared equity through help to buy or shared ownership. There should be flexibility between Shared Ownership, discount market and Shared Equity.	The needs for Shared Ownership are distinct from need for other affordable tenures as assessed by the Strategic Housing Market Assessment that has underpinned the Local Plan policies.

Summary of matters raised through second virtual roundtable (9th September 2021)

Note – time was also provided for comments to be provided after the session, and these points are also incorporated below. Input was received from two organisations from the development sector.

Summary of matter raised	How the matter has been addressed
Welcome clarification on the tenure mix in light of the introduction of First Homes.	Chapter 3 of the Draft SPD sets out that the Council will expect the 25% First Homes to be secured in place of other discounted market tenures.
It was commented that CIL relief would need to be transferred to the RP.	Noted.
Planning Application Stage	
Flexibility is required for outline planning applications as the number of dwellings and the mix would be confirmed at Reserved Matters stage.	Reference has been included to percentages being appropriate for outline applications where numbers are not yet known.
Preparation of a Section 106 agreement	
(Para 3) It was stated that it is important that there is flexibility to enable the mix etc to be confirmed via the Affordable Housing Scheme.	The template definition for 'Affordable Housing Table' allows for 'unless otherwise agreed with the Council', which should ensure flexibility.
(Para 4) The identity of the Registered Provider should be confirmed rather than approved by the Council.	It can be a swift process for the Council to check the RP meets the definition. The Council maintains a list of RPs on its website and a cross reference to this has been included in the draft SPD. For clarity, the Council has stated that it is the name and registration number that is required.
(Para 4) Reference to any other information is considered vague and there is potential for delay by requiring information that is unknown.	If the appropriate information has been submitted it is less likely that any other information would be needed however the Council considers it important to retain this should there be a need for further information in any circumstances.
(Para 5) This was considered onerous as often contracts are only exchanged with RPs a few days before handover.	'Unless otherwise agreed in writing' has been included.
(Para 5) This would not apply to First Homes / Discounted market sale.	This has been clarified through reference to 'Where the affordable houses are to be transferred to a Registered Provider...'
(Para 7) Reference to 'large scheme' was not considered appropriate.	The paragraph refers to justification being needed for circumstances where alternative triggers are appropriate, as it is acknowledged this may not be limited to large sites.
(Para 7) 'Unless otherwise agreed' should be included to avoid the need for a deed of variation.	It is considered that in these cases a deed of variation is more appropriate, if there is going to be variation in the point at which affordable housing is provided.

(Para 11) A local connections cascade should not apply to strategic sites which meet a district wide need.	'Unless otherwise agreed' has been included which provides for circumstances where a local connections cascade is not appropriate.
(Para 14) Specific steps and timescales should be set out to ensure negotiations do not become protracted.	Further guidance on this is contained in Chapter 4 of the SPD.
(Para 18) 'Unless otherwise agreed' should be included as this could be problematic for an RP.	The draft Template Clauses set out that this would be ringfenced for five years for the provision of affordable housing in East Suffolk.
(Para 22) It is considered that payment of the contribution by first occupation is too onerous.	The draft Heads of Terms refers to this being received by 40% occupation.
Template definitions	
Affordable Housing - It was suggested that as the definition of affordable housing changes over time, reference should be made to the NPPF definitions.	Reference is made to Annex 2 of the NPPF.
Affordable Housing Scheme – there shouldn't be a need for the Council to approve the identity of a Registered Provider.	It can be a swift process for the Council to check the RP meets the definition. The Council maintains a list of RPs on its website and a cross reference to this has been included in the draft SPD. For clarity, the Council has stated in paragraph 4 that it is the name and registration number that is required.
Discount Market Sale Dwellings – certainty would be required as to the percentage of discount.	It would be for the developer to offer a larger discount – the Council would not require this.
First Homes - certainty would be required as to the percentage of discount.	This discount for First Homes is set as a minimum of 30% in the Planning Practice Guidance. The Council could not require a greater discount unless it had adopted this approach. This definition will be adjusted if necessary when template planning obligations are published by the Government.
Registered Provider – There should not be a need for the Council to approve most Registered Providers.	See response to comments on paragraph 4
Template Covenants	
Covenant 3 and 4 – This is considered to be too onerous	See response to paragraph 5 above - 'Unless otherwise agreed in writing' has been included in that section.
Covenant 13/15 – This introduces a further approval process and uncertainty	Further guidance is expected from the Government on First Homes which is also likely to inform shared equity and discounted market sale.
Covenant 22 – It would be unreasonable to reduce the asking price as this is increasing the discount to more than 20% or 30%.	This is taken from the Planning Practice Guidance on First Homes. Further guidance is expected from the Government on First Homes.

Appendix 4 – Consultation Bodies

The following organisations and groups were consulted during the preparation of the Supplementary Planning Document:

- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Members of the public

Specific consultation bodies

- The Coal Authority
- Environment Agency
- English Heritage
- Marine Management Organisation
- Natural England
- Network Rail
- Highways Agency
- Suffolk County Council
- Parish and Town Councils within and adjoining East Suffolk
- Suffolk Constabulary
- Adjoining local planning authorities – Ipswich Borough Council, Mid Suffolk District Council, Babergh District Council, Great Yarmouth Borough Council, Broads Authority, South Norfolk District Council
- Anglian Water
- Essex and Suffolk Water
- Homes England
- Electronic communication companies who own or control apparatus in the Suffolk Coastal District
- Relevant gas and electricity companies
- NHS England
- Ipswich and East Suffolk Clinical Commissioning Group
- Great Yarmouth and Waveney Clinical Commissioning Group

General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the District
- Bodies which represent the interests of different racial, ethnic or national groups in the District
- Bodies which represent the interests of different religious groups in the District
- Bodies which represent the interests of disabled persons in the District
- Bodies which represent the interests of persons carrying on business in the District


- Bodies which represent the interests of environmental groups in the District


Other individuals and organisations





Includes local businesses, high schools, individuals, local organisations and groups, planning agents, developers, landowners, residents and others on the Local Plan mailing list.



Appendix 5 – Consultation Promotion

Twitter – 1st November 2021

← **East Suffolk Council**  17.8K Tweets Follow




  2  6 

 **East Suffolk Council**  @EastSuffolk · 1 Nov ...





Consultations begin today on three draft planning documents:

- the Affordable Housing Supplementary Planning Document,
- the Sustainable Construction Supplementary Planning Document,
- and the East Suffolk Cycling and Walking Strategy.

Have your say! [eastsuffolk.gov.uk/news/have-your...](https://eastsuffolk.gov.uk/news/have-your-...)



East Suffolk Council Planning

 1  12  11 

Twitter – 22nd November 2021



The image is a screenshot of a Twitter post. At the top left is the profile picture of East Suffolk Council, which features a stylized green and yellow triangle. To the right of the profile picture is the text "East Suffolk Council" followed by a blue verified account icon and the handle "@EastSuffolk". The date "Nov 22" is displayed to the right of the handle. Below the header is the main text of the tweet: "Have your say! The consultations on the draft East Suffolk Affordable Housing Supplementary Planning Document and the draft East Suffolk Sustainable Construction Supplementary Planning Document are still open for responses:". This is followed by a blue hyperlink: "eastsuffolk.gov.uk/planning/plann...". Below the text is a photograph of a silver laptop with a black keyboard, viewed from a slightly elevated angle. Underneath the photo, the text "East Suffolk Council Planning" is visible. At the bottom of the tweet are four interaction icons: a speech bubble, a retweet icon with the number "2", a heart icon with the number "1", and a share icon.

East Suffolk Council @EastSuffolk · Nov 22

Have your say! The consultations on the draft East Suffolk Affordable Housing Supplementary Planning Document and the draft East Suffolk Sustainable Construction Supplementary Planning Document are still open for responses:

eastsuffolk.gov.uk/planning/plann...

East Suffolk Council Planning

2 retweets, 1 like

Facebook – 24th November 2021



East Suffolk Council
2 mins · 🌐

Have your say! 🗨️

Consultations on three draft planning documents are still open. You can comment on:

- the Affordable Housing Supplementary Planning Document,
- the Sustainable Construction Supplementary Planning Document,
- and the East Suffolk Cycling and Walking Strategy.


View the documents and comment at
<https://www.eastsuffolk.gov.uk/.../planning-policy-consultat.../>



👍 Like 💬 Comment ➦ Share

See all

Press Release – 1st November 2021



My East Suffolk | Find my nearest | Contact us | Make a payment | Jobs

Access local council services and information quickly and easily

Home > News > Have your say on draft planning documents

Have your say on draft planning documents

Posted by on 1 November 2021 | Comments

Tags: [planning](#), [cycling](#), [environment](#)

East Suffolk residents are invited to have their say on three new planning documents covering affordable housing, sustainable construction and cycling and walking.

Consultations on three draft documents have launched today (Monday 1 November):

- the draft Affordable Housing Supplementary Planning Document
- the draft Sustainable Construction Supplementary Planning Document
- and the draft East Suffolk Cycling and Walking Strategy.

The Affordable Housing Supplementary Planning Document (SPD) will provide guidance on the implementation of East Suffolk Council's affordable housing planning policies. The draft SPD covers a range of matters including types of affordable housing, identifying an appropriate mix of affordable housing, the design of affordable housing, legal agreements, carrying out local housing need assessments and making planning applications.

This consultation is now closed.

The Sustainable Construction Supplementary Planning Document (SPD) will provide guidance on the Council's planning policies on sustainable construction, including guidance on a range of topics relating to the construction of environmentally sustainable buildings. Examples include increasing water efficiency in buildings, increasing energy efficiency and reducing carbon emissions from buildings, use of responsibly sourced and renewable materials, reducing construction waste, orienting buildings for solar gain, and using green infrastructure to increase biodiversity.

This consultation is now closed.

The draft [East Suffolk Cycling and Walking Strategy](#) provides a district-wide shortlist of cycling and walking infrastructure opportunities. The strategy aims to encourage greater use of sustainable forms of transport, reduce contributions to climate change, support the growth of the tourism industry, and to improve the health and wellbeing of residents by ensuring more trips to work, school, leisure, day-to-day errands, or public transport hubs, such as train stations or park and ride sites, are accessible by bike or on foot. Once adopted, this strategy will replace the [Waveney Cycle Strategy \(2016\)](#) and will cover the whole of the district.

Cllr David Ritchie, Cabinet Member for Planning and Coastal Management said: "We want to increase the opportunities for people to walk and cycle safely around the district, reducing reliance on vehicles, improving the environment, and benefiting people's health. Our Cycling and Walking Strategy sets out ways we can do this, and we would welcome any feedback on this and on the Supplementary Planning Documents which will enable us to make decisions on future developments."

This consultation is now closed.



Consultation Poster



Have your say

Draft Sustainable Construction Supplementary Planning Document

Draft Affordable Housing Supplementary Planning Document

Consultation period
1st November to 5pm 13th December 2021

Draft Cycling and Walking Strategy

Consultation period
1st November 2021 to 5pm 10th January 2022

What are we doing?

East Suffolk Council is in the process of preparing a new Sustainable Construction Supplementary Planning Document and a new Affordable Housing Supplementary Planning Document which will provide guidance to support the Council's planning policies on these matters.

We are also preparing a Cycling and Walking Strategy, which identifies potential cycling and walking infrastructure opportunities across the district.

How can you get involved?



GIVE YOUR VIEWS

Visit the website below to view and comment on the draft documents. Hard copies of the three documents are also available to view in libraries and the Council's Customer Service Centres. Please contact us if you need any assistance in viewing the documents.

Find out more and give your views:
[www.eastsuffolk.gov.uk/
planning-policy-consultations](http://www.eastsuffolk.gov.uk/planning-policy-consultations)

Alternatively, please send comments to:
East Suffolk Council, Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

✉ planningpolicy@eastsuffolk.gov.uk
☎ 01394 444557 / 01502 523029

Appendix 6 – Consultation responses

Please note that in the Comment Summary column any page and paragraph numbers relate to the Draft Affordable Housing Supplementary Planning Document (November 2021)

1. Introduction

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Beal, Natalie)	15	East Suffolk Council is the housing authority for the whole district, including the part in the Broads. The Broads Local Plan Affordable Housing Policy defers to East Suffolk's adopted policy. This SPD would be used for schemes that trigger affordable housing. More is therefore needed in this section. Should the SPD also relate to the threshold of 6-9 dwellings in the Broads Local Plan?	The Council agrees that it would be helpful to clarify the position in relation to the Broads Authority, in both Chapter 1 Introduction and in Chapter 5 Financial Contributions.	Changes have been made to paragraph 1.11 and through the addition of a new paragraph after paragraph 5.3.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	78	<p>1.7 Affordable Housing can also be delivered on schemes brought forward for entirely, or largely, affordable housing. Historically this has formed a large part of supply in East Suffolk. These will require different treatment in S106 agreements so grant support is not adversely affected.</p> <p>1.22 appears a narrow definition of the housing enabling function and should include encouraging and supporting Registered Providers.</p>	<p>1.7 The Council agrees that affordable housing does also come forward in the way explained. The paragraph intended to refer to the key ways in which planning policies bring forward affordable housing and has therefore been amended to clarify this.</p> <p>1.22 The Council also agrees that paragraph 1.22 could be expanded to draw on the proactive approach of the Council in delivering affordable housing, to reflect the context set out in paragraphs 1.4-1.6 which refer to the Council's strategies which relate to affordable housing delivery.</p>	<p>Reference to other ways of delivering affordable housing added to paragraph 1.7. Additional text has also been added to paragraph 4.14 to reflect that the model Heads of Terms may be deviated from when housing is brought forward other than as required as part of a market housing development or as an exception site.</p> <p>Reference to the Council's proactive role in supporting the delivery of affordable housing added to paragraph 1.22.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	34	<p>1.7 Affordable Housing can also be delivered on schemes brought forward for entirely, or largely, affordable housing. Historically this has formed a large part of supply in East Suffolk. These will require different treatment in S106 agreements so grant support is not adversely affected.</p> <p>1.22 appears a narrow definition of the housing enabling function and should include encouraging and supporting Registered Providers.</p>	<p>1.7 The Council agrees that affordable housing does also come forward in the way explained. The paragraph intended to refer to the key ways in which planning policies bring forward affordable housing and has therefore been amended to clarify this.</p> <p>1.22 The Council also agrees that paragraph 1.22 could be expanded to draw on the proactive approach of the Council in delivering affordable housing, to reflect the context set out in paragraphs 1.4-1.6 which refer to the Council's strategies which relate to affordable housing delivery.</p>	<p>Reference to other ways of delivering affordable housing added to paragraph 1.7. Additional text has also been added to paragraph 4.14 to reflect that the model Heads of Terms may be deviated from when housing is brought forward other than as required as part of a market housing development or as an exception site.</p> <p>Reference to the Council's proactive role in supporting the delivery of affordable housing added to paragraph 1.22.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
<p>Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>44</p>	<p>1.7 Affordable Housing can also be delivered on schemes brought forward for entirely, or largely, affordable housing. Historically this has formed a large part of supply in East Suffolk. These will require different treatment in S106 agreements so grant support is not adversely affected.</p> <p>1.22 appears a narrow definition of the housing enabling function and should include encouraging and supporting Registered Providers.</p>	<p>1.7 The Council agrees that affordable housing does also come forward in the way explained. The paragraph intended to refer to the key ways in which planning policies bring forward affordable housing and has therefore been amended to clarify this.</p> <p>1.22 The Council also agrees that paragraph 1.22 could be expanded to draw on the proactive approach of the Council in delivering affordable housing, to reflect the context set out in paragraphs 1.4-1.6 which refer to the Council's strategies which relate to affordable housing delivery.</p>	<p>Reference to other ways of delivering affordable housing added to paragraph 1.7. Additional text has also been added to paragraph 4.14 to reflect that the model Heads of Terms may be deviated from when housing is brought forward other than as required as part of a market housing development or as an exception site.</p> <p>Reference to the Council's proactive role in supporting the delivery of affordable housing added to paragraph 1.22.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	56	<p>1.7 Affordable Housing can also be delivered on schemes brought forward for entirely, or largely, affordable housing. Historically this has formed a large part of supply in East Suffolk. These will require different treatment in S106 agreements so grant support is not adversely affected.</p> <p>1.22 appears a narrow definition of the housing enabling function and should include encouraging and supporting Registered Providers.</p>	<p>1.7 The Council agrees that affordable housing does also come forward in the way explained. The paragraph intended to refer to the key ways in which planning policies bring forward affordable housing and has therefore been amended to clarify this.</p> <p>1.22 The Council also agrees that paragraph 1.22 could be expanded to draw on the proactive approach of the Council in delivering affordable housing, to reflect the context set out in paragraphs 1.4-1.6 which refer to the Council's strategies which relate to affordable housing delivery.</p>	<p>Reference to other ways of delivering affordable housing added to paragraph 1.7. Additional text has also been added to paragraph 4.14 to reflect that the model Heads of Terms may be deviated from when housing is brought forward other than as required as part of a market housing development or as an exception site.</p> <p>Reference to the Council's proactive role in supporting the delivery of affordable housing added to paragraph 1.22.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	67	<p>1.7 Affordable Housing can also be delivered on schemes brought forward for entirely, or largely, affordable housing. Historically this has formed a large part of supply in East Suffolk. These will require different treatment in S106 agreements so grant support is not adversely affected.</p> <p>1.22 appears a narrow definition of the housing enabling function and should include encouraging and supporting Registered Providers.</p>	<p>1.7 The Council agrees that affordable housing does also come forward in the way explained. The paragraph intended to refer to the key ways in which planning policies bring forward affordable housing and has therefore been amended to clarify this.</p> <p>1.22 The Council also agrees that paragraph 1.22 could be expanded to draw on the proactive approach of the Council in delivering affordable housing, to reflect the context set out in paragraphs 1.4-1.6 which refer to the Council's strategies which relate to affordable housing delivery.</p>	<p>Reference to other ways of delivering affordable housing added to paragraph 1.7. Additional text has also been added to paragraph 4.14 to reflect that the model Heads of Terms may be deviated from when housing is brought forward other than as required as part of a market housing development or as an exception site.</p> <p>Reference to the Council's proactive role in supporting the delivery of affordable housing added to paragraph 1.22.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Lowestoft Town Council (Foote, Sarah)	95	208 seems a very low number of houses required.	The figure of 208 affordable dwellings needed per year was identified through the Strategic Housing Market Assessment for the Ipswich and Waveney Housing Market Areas (Part 2) which can be viewed on the Local Plan evidence base webpage at www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/ .	No changes needed.
Saul D Humphrey (Humphrey, Saul)	1	Affordable housing, as well as CIL, can make viability marginal on some sites.	The policies in the Local Plans were viability tested as part of the preparation of the Local Plans, and therefore under paragraph 58 of the NPPF the policies should be assumed to be viable. The policies set out that in exceptional circumstances, the Council may agree to vary the requirement where it is satisfied that provision of affordable housing is not viable where demonstrated through a viability assessment.	No changes needed.

2. Types of affordable housing

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	19	An obligation to provide self-build on a development has its own frustrations, from location, access, phasing to design guide, marketing, etc. Affordable self build is impractical - the market is limited and it has the potential to frustrate delivery.	The requirement to provide self build housing on housing developments and the requirement to provide affordable housing are two distinct policy requirements. There is no policy requirement to provide affordable self build on a non-self build development. The SPD acknowledges the complexities around delivering affordable self build however as a form of housing development self build developments which meet the relevant policy thresholds must provide affordable housing.	No changes needed.
Beavan, David (East Suffolk Councillor)	3	It is difficult to finance building affordable housing when rent is capped at the LHA (Local Housing Allowance). Those who pay half or more of their income on rent should be recognised as being in housing need and intermediate rents may be a way forward. Discounted sales at 80% are not affordable in my ward because of high market prices.	The Strategic Housing Market Assessment for the Ipswich and Waveney Housing Market Areas (Part 2) (available on the Local Plan evidence base webpage at www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/) assessed needs for affordable housing on the basis of housing costing up to 35% of gross household income. Different tenures of affordable housing will meet different needs, and a discounted sales property wouldn't meet the same housing need as an affordable rented property. The National Planning Policy Framework sets out the definitions of affordable housing and states that the discount for low cost homes for sale should	No changes needed.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>be at least 20%. First Homes, which have been introduced by the Government in 2021, must be at least 30% below market value and Chapter 3 of the SPD sets out how First Homes will be expected to make up 25% of affordable housing on residential sites. Rent to Buy is a form of intermediate rent and is recognised in the NPPF and the SPD as affordable housing.</p>	
<p>Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>79</p>	<p>2.2 3rd paragraph should include 'inclusive of service charges' to correspond with Homes England and NPPF definitions.</p> <p>2.3 should refer to community groups needed to be registered with the Regulator of Social Housing.</p> <p>2.5 Shared Equity is often sold to purchasers on a freehold basis with the discount protected by a charge. This should be mentioned here for consistency and clarity.</p> <p>2.11 is duplication of 1.7.</p> <p>2.31. There should be no expectation that self-build / custom-build schemes should include affordable housing delivered as self or custom build. There may be no RP to assist in delivery or people prepared to engage and with the requisite skills to take</p>	<p>2.2 The first paragraph includes the words 'inclusive of service charges'</p> <p>2.3 Agree, this change would add clarity</p> <p>2.5 Agree, this change would add clarity</p> <p>2.11 Agree, this duplication is not needed</p> <p>2.31 The paragraph acknowledges that there will be circumstances where a Registered Provider may not be willing to take on the affordable self build element. However, the paragraph 63 of the NPPF and policies SCLP5.10 and WLP8.2 expect provision to be made on-site and this must therefore be the starting point. Paragraph 2.31 (now 2.32) has been amended to clarify different options for delivering self-build affordable dwellings.</p>	<p>2.2 No change needed.</p> <p>2.3 The text "(where registered with the Regulator of Social Housing)" has been added</p> <p>2.5 The text "Shared Equity is often sold on a freehold basis with the discount protected by a charge." has been added</p> <p>2.11 Paragraph of the Draft SPD has been removed</p> <p>2.31 (now 2.32) Paragraph has been amended to clarify possible options for securing affordable self build.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>it forward. If the right elements are not in place such schemes should provide affordable housing via off site commuted sums. The emphasis must move from an expectation of delivery with RPs of self-build, to enabling delivery. The paragraph notes that the council will support the sale of self-build plots at less than market value, without reference to any mechanism to facilitate this and it is not clear what is proposed. Affordable housing delivered through a requirement in S106 agreements is generally delivered at a negative plot value.</p>		
<p>Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>35</p>	<p>2.2 3rd paragraph should include 'inclusive of service charges' to correspond with Homes England and NPPF definitions.</p> <p>2.3 should refer to community groups needed to be registered with the Regulator of Social Housing.</p> <p>2.5 Shared Equity is often sold to purchasers on a freehold basis with the discount protected by a charge. This should be mentioned here for consistency and clarity.</p> <p>2.11 is duplication of 1.7.</p> <p>2.31. There should be no expectation that</p>	<p>2.2 The first paragraph includes the words 'inclusive of service charges'</p> <p>2.3 Agree, this change would add clarity</p> <p>2.5 Agree, this change would add clarity</p> <p>2.11 Agree, this duplication is not needed</p> <p>2.31 The paragraph acknowledges that there will be circumstances where a Registered Provider may not be willing to take on the affordable self build element. However, the paragraph 63 of the NPPF and policies SCLP5.10 and WLP8.2 expect provision to be made on-site and this must therefore be the starting point. Paragraph 2.31 (now 2.32) has</p>	<p>2.2 No change needed.</p> <p>2.3 The text "(where registered with the Regulator of Social Housing)" has been added</p> <p>2.5 The text "Shared Equity is often sold on a freehold basis with the discount protected by a charge." has been added</p> <p>2.11 Paragraph of the Draft SPD has been removed</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>self-build / custom-build schemes should include affordable housing delivered as self or custom build. There may be no RP to assist in delivery or people prepared to engage and with the requisite skills to take it forward. If the right elements are not in place such schemes should provide affordable housing via off site commuted sums. The emphasis must move from an expectation of delivery with RPs of self-build, to enabling delivery. The paragraph notes that the council will support the sale of self-build plots at less than market value, without reference to any mechanism to facilitate this and it is not clear what is proposed. Affordable housing delivered through a requirement in S106 agreements is generally delivered at a negative plot value.</p>	<p>been amended to clarify different options for delivering self-build affordable dwellings.</p>	<p>2.31 (now 2.32) Paragraph has been amended to clarify possible options for securing affordable self build.</p>
<p>Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>45</p>	<p>2.2 3rd paragraph should include 'inclusive of service charges' to correspond with Homes England and NPPF definitions.</p> <p>2.3 should refer to community groups needed to be registered with the Regulator of Social Housing.</p> <p>2.5 Shared Equity is often sold to purchasers on a freehold basis with the discount protected by a charge. This</p>	<p>2.2 The first paragraph includes the words 'inclusive of service charges'</p> <p>2.3 Agree, this change would add clarity</p> <p>2.5 Agree, this change would add clarity</p> <p>2.11 Agree, this duplication is not needed</p> <p>2.31 The paragraph acknowledges that there will be circumstances where a Registered Provider may not be willing to take on the</p>	<p>2.2 No change needed.</p> <p>2.3 The text "(where registered with the Regulator of Social Housing)" has been added</p> <p>2.5 The text "Shared Equity is often sold on a freehold basis with the discount protected by a charge." has been added</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>should be mentioned here for consistency and clarity.</p> <p>2.11 is duplication of 1.7.</p> <p>2.31. There should be no expectation that self-build / custom-build schemes should include affordable housing delivered as self or custom build. There may be no RP to assist in delivery or people prepared to engage and with the requisite skills to take it forward. If the right elements are not in place such schemes should provide affordable housing via off site commuted sums. The emphasis must move from an expectation of delivery with RPs of self-build, to enabling delivery. The paragraph notes that the council will support the sale of self-build plots at less than market value, without reference to any mechanism to facilitate this and it is not clear what is proposed. Affordable housing delivered through a requirement in S106 agreements is generally delivered at a negative plot value.</p>	<p>affordable self build element. However, the paragraph 63 of the NPPF and policies SCLP5.10 and WLP8.2 expect provision to be made on-site and this must therefore be the starting point. Paragraph 2.31 (now 2.32) has been amended to clarify different options for delivering self-build affordable dwellings.</p>	<p>2.11 Paragraph of the Draft SPD has been removed</p> <p>2.31 (now 2.32) Paragraph has been amended to clarify possible options for securing affordable self build.</p>
<p>Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>57</p>	<p>2.2 3rd paragraph should include 'inclusive of service charges' to correspond with Homes England and NPPF definitions.</p> <p>2.3 should refer to community groups</p>	<p>2.2 The first paragraph includes the words 'inclusive of service charges'</p> <p>2.3 Agree, this change would add clarity</p> <p>2.5 Agree, this change would add clarity</p>	<p>2.2 No change needed.</p> <p>2.3 The text "(where registered with the Regulator of Social Housing)" has been added</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>needed to be registered with the Regulator of Social Housing.</p> <p>2.5 Shared Equity is often sold to purchasers on a freehold basis with the discount protected by a charge. This should be mentioned here for consistency and clarity.</p> <p>2.11 is duplication of 1.7.</p> <p>2.31. There should be no expectation that self-build / custom-build schemes should include affordable housing delivered as self or custom build. There may be no RP to assist in delivery or people prepared to engage and with the requisite skills to take it forward. If the right elements are not in place such schemes should provide affordable housing via off site commuted sums. The emphasis must move from an expectation of delivery with RPs of self-build, to enabling delivery. The paragraph notes that the council will support the sale of self-build plots at less than market value, without reference to any mechanism to facilitate this and it is not clear what is proposed. Affordable housing delivered through a requirement in S106 agreements is generally delivered at a negative plot value.</p>	<p>2.11 Agree, this duplication is not needed</p> <p>2.31 The paragraph acknowledges that there will be circumstances where a Registered Provider may not be willing to take on the affordable self build element. However, the paragraph 63 of the NPPF and policies SCLP5.10 and WLP8.2 expect provision to be made on-site and this must therefore be the starting point. Paragraph 2.31 (now 2.32) has been amended to clarify different options for delivering self-build affordable dwellings.</p>	<p>2.5 The text "Shared Equity is often sold on a freehold basis with the discount protected by a charge." has been added</p> <p>2.11 Paragraph of the Draft SPD has been removed</p> <p>2.31 (now 2.32) Paragraph has been amended to clarify possible options for securing affordable self build.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	68	<p>2.2 3rd paragraph should include 'inclusive of service charges' to correspond with Homes England and NPPF definitions.</p> <p>2.3 should refer to community groups needed to be registered with the Regulator of Social Housing.</p> <p>2.5 Shared Equity is often sold to purchasers on a freehold basis with the discount protected by a charge. This should be mentioned here for consistency and clarity.</p> <p>2.11 is duplication of 1.7.</p> <p>2.31. There should be no expectation that self-build / custom-build schemes should include affordable housing delivered as self or custom build. There may be no RP to assist in delivery or people prepared to engage and with the requisite skills to take it forward. If the right elements are not in place such schemes should provide affordable housing via off site commuted sums. The emphasis must move from an expectation of delivery with RPs of self-build, to enabling delivery. The paragraph notes that the council will support the sale of self-build plots at less than market value, without reference to any</p>	<p>2.2 The first paragraph includes the words 'inclusive of service charges'</p> <p>2.3 Agree, this change would add clarity</p> <p>2.5 Agree, this change would add clarity</p> <p>2.11 Agree, this duplication is not needed</p> <p>2.31 The paragraph acknowledges that there will be circumstances where a Registered Provider may not be willing to take on the affordable self build element. However, the paragraph 63 of the NPPF and policies SCLP5.10 and WLP8.2 expect provision to be made on-site and this must therefore be the starting point. Paragraph 2.31 (now 2.32) has been amended to clarify different options for delivering self-build affordable dwellings.</p>	<p>2.2 No change needed.</p> <p>2.3 The text "(where registered with the Regulator of Social Housing)" has been added</p> <p>2.5 The text "Shared Equity is often sold on a freehold basis with the discount protected by a charge." has been added</p> <p>2.11 Paragraph of the Draft SPD has been removed</p> <p>2.31 (now 2.32) Paragraph has been amended to clarify possible options for securing affordable self build.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		mechanism to facilitate this and it is not clear what is proposed. Affordable housing delivered through a requirement in S106 agreements is generally delivered at a negative plot value.		
Ipswich and East Suffolk Clinical Commissioning Group	88	Consideration should be given to enabling affordable housing for health key workers. There is a workforce and retention gap in East Suffolk for health and social care workers. The CCG would like to work in partnership with ESC as part of a needs assessment across Suffolk and North East Essex to determine the affordable housing needs of health key workers.	Whilst the merits of providing affordable housing for health key workers is fully acknowledged, the appropriate time to comprehensively consider the needs for key workers, where appropriate, is considered to be through a future Local Plan review. The Council is however interested in understanding more about this work as part of its ongoing liaison with the CCG.	No changes needed
Debenham, Karen	2	Affordable self build is a great idea.	Comment noted.	No changes needed
Woodbridge Town Council (Diaper, Greg)	22	Affordable housing in larger urban areas requires a policy to address problems related to private/affordable housing in a housing unit. Affordable housing needs to be more attractive to social housing providers. Housing developers should be made aware of the percentage of affordable housing that would be attractive for social housing companies.	The Local Plan policies set out the proportion of affordable housing that is required on sites above the threshold (as explained in Chapter 3 of the SPD). Chapter 4 of the SPD, which covers Section 106 agreements, encourages early engagement between developers and Registered Providers to increase the likelihood of a Registered Provider taking on the affordable units.	No changes needed.

3. Identifying an appropriate mix of affordable housing

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	100	Flexibility around tenure is important as many intermediate market tenures only work in practice if there are affordable mortgage products available in the market to suit the product. If specialist affordable housing is required, there needs to be recognition that this can impact viability and therefore flexibility needs to be allowable.	This is noted, however the policies expect certain tenures that are set out in the definition in the NPPF and therefore a lack of any suitable mortgages for these products is unlikely to only affect East Suffolk and would be best placed being addressed nationally. Paragraph 3.25 (now 3.26) has been amended to clarify that consideration should be given to whether affordable specialist needs could be met rather than implying this is required in all cases.	Paragraph 3.25 (now 3.26) has been amended to clarify that consideration should be given to whether affordable specialist needs could be met rather than requiring these to be met in all cases on non-specialist developments.
Badger Building (E. Anglia) Ltd (Coote, Justin)	97	Flexibility within the SPD is required with regards to tenure, particularly around affordable ownership.	The Local Plan policies set out the expectations in relation to tenure and the Government further expects that 25% of affordable housing delivered will be First Homes. The SPD provides guidance in the context of these policies.	No changes needed.
Beavan, David (East Suffolk Councillor)	4	Welcome that First Homes will not affect the 50% provision of affordable homes to rent. Why can't the £250k cap be extended to all discounted market housing?	The cap of £250,000 is specifically applied to First Homes through the Planning Practice Guidance on First Homes. Other forms of discounted sales would need to have a discount of at least 20%, but there is no provision in national policy to set a price cap.	No changes needed.
Hopkins Homes Ltd (Pathfinder Development)	80	3.1 and 3.6 - concerned that the primary driver for affordable mix is the Strategic Housing Market Assessment. Far more emphasis should be placed on the Choice	3.1 and 3.6 - The Strategic Housing Market Assessment (SHMA) has informed the tenure split in policies SCLP5.10 and WLP8.2, which the SPD is providing	Paragraphs 2.6, 2.9 and 3.7 - 3.10 – amendments made for clarity as to how the First

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Consultants) (Aust, Martin)		<p>Based Lettings register and experience of Registered Providers in letting homes.</p> <p>3.7 / 3.8 - the proposal to displace discounted market housing in the Suffolk Coastal area and half of the intermediate low cost housing in the Waveney area with First Homes is contrary to the Planning Practice Guidance on First Homes (paragraph 70-015-20210524).</p> <p>3.15 - It would be hoped summaries of the housing register data could be made available to inform early decision making.</p> <p>3.16 - Registered Providers might provide better information than Help to Buy Agents.</p> <p>3.20 Registered Providers should be encouraged to bring forward Exception Sites, the responsibility of identifying needs should be shared with the Housing Enabling function.</p> <p>3.24. It is almost certain that to practically deliver such schemes (C2) in a way that management arrangements work, affordable housing is delivered off site via commuted sums, unless the scheme is brought forward by an RP.</p>	<p>further guidance on. Paragraph 3.15 sets out that the Housing Register should be considered alongside the SHMA.</p> <p>3.7 / 3.8 - First Homes are a type of discounted market housing. The examples included in paragraph 70-015-20210524 of the PPG relate to policies that specify types of affordable housing that would not relate to provision of First Homes. This does not apply in the case of the Suffolk Coastal Local Plan and the Waveney Local Plan. Amendments have been made to paragraphs 2.6, 2.9 and 3.7 – 3.10 of the SPD for clarity.</p> <p>3.15 – Applicants, developers and Registered Providers can contact the Housing Enabling Team for housing need information, and reference to this has been included in the SPD.</p> <p>3.16 - Reference to Registered Providers having information on needs for affordable home ownership dwellings has been added to paragraph 3.16.</p> <p>3.20 - Chapter 6 provides more guidance on bringing forward exception sites including the role of the Council's housing enabling function in supporting exception</p>	<p>Homes policy relates to the adopted Local Plan policies.</p> <p>3.15 – Text added “The Housing Enabling Team can be contacted for information on the data held on the Housing Register.”</p> <p>3.16 - Text added at the end of the paragraph- "and/or through Registered Providers."</p> <p>3.25 (now 3.26) - Text amended to state "that could" rather than "to" in the third sentence.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>3.25. The bringing forward of such projects (affordable specialist housing) is complex and can't simply be a response to housing need. Revenue funding support must be available (Adult Social Care) and the risks acceptable to RPs. These points need to be picked up in the SPD, including the role of the Housing Enabling function in securing revenue funding streams and agreements over void loss.</p> <p>3.28 Wheelchair accessible accommodation (especially for families) often requires bespoke design to meet the specific needs of potential tenants. In some instances, this means that provision is better made by RPs. It may therefore be appropriate in such circumstances to seek off site provision via commuted sums.</p>	<p>sites coming forward. However, at the planning stage it will be for the applicant to demonstrate the need that will be addressed.</p> <p>3.24 - The starting point of the Local Plan policies and paragraph 63 of the NPPF is that affordable housing is provided on site. Provision on site also contributes to the creation of mixed and balanced communities. Chapter 5 of the SPD provides guidance on commuted sums and acknowledges that there could be circumstances where affordable housing cannot feasibly be provided on site.</p> <p>3.25 - It is acknowledged that as drafted the paragraph suggests that identifying a need is the only consideration. The paragraph has therefore been amended to remove the assumption that if needs for affordable specialist accommodation exist they would be provided for on any non-specialist housing developments, in reflection of the fact that specialist needs form one element of the needs for accommodation for older people.</p> <p>3.28 – Chapter 5 acknowledges that there may be circumstances where a commuted sum is preferable which</p>	

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			<p>includes “circumstances where the Council considers that a contribution could enable delivery of a better affordable solution”. The circumstances explained by the respondent could fall into this category.</p>	
<p>Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>36</p>	<p>3.1 and 3.6 - concerned that the primary driver for affordable mix is the Strategic Housing Market Assessment. Far more emphasis should be placed on the Choice Based Lettings register and experience of Registered Providers in letting homes.</p> <p>3.7 / 3.8 - the proposal to displace discounted market housing in the Suffolk Coastal area and half of the intermediate low cost housing in the Waveney area with First Homes is contrary to the Planning Practice Guidance on First Homes (paragraph 70-015-20210524).</p> <p>3.15 - It would be hoped summaries of the housing register data could be made available to inform early decision making.</p> <p>3.16 - Registered Providers might provide better information than Help to Buy Agents.</p> <p>3.20 Registered Providers should be encouraged to bring forward Exception</p>	<p>3.1 and 3.6 - The Strategic Housing Market Assessment has informed the tenure split in policies SCLP5.10 and WLP8.2, which the SPD is providing further guidance on. Paragraph 3.15 sets out that the Housing Register should be considered alongside the SHMA.</p> <p>3.7 / 3.8 - First Homes are a type of discounted market housing. The examples included in paragraph 70-015-20210524 of the PPG relate to policies that specify types of affordable housing that would not relate to provision of First Homes. This does not apply in the case of the Suffolk Coastal Local Plan and the Waveney Local Plan. Amendments have been made to paragraphs 2.6, 2.9 and 3.7 – 3.10 of the SPD for clarity.</p> <p>3.16 - Reference to Registered Providers having information on needs for affordable home ownership dwellings has been added to paragraph 3.16.</p>	<p>Paragraphs 2.6, 2.9 and 3.7 - 3.10 – amendments made for clarity as to how the First Homes policy relates to the adopted Local Plan policies.</p> <p>3.15 – Text added “The Housing Enabling Team can be contacted for information on the data held on the Housing Register.”</p> <p>3.16 - Text added at the end of the paragraph- "and/or through Registered Providers."</p> <p>3.25 (now 3.26) - Text amended to state "that could" rather than "to" in the third sentence.</p>

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		<p>Sites, the responsibility of identifying needs should be shared with the Housing Enabling function.</p> <p>3.24. It is almost certain that to practically deliver such schemes (C2) in a way that management arrangements work, affordable housing is delivered off site via commuted sums, unless the scheme is brought forward by an RP.</p> <p>3.25. The bringing forward of such projects (affordable specialist housing) is complex and can't simply be a response to housing need. Revenue funding support must be available (Adult Social Care) and the risks acceptable to RPs. These points need to be picked up in the SPD, including the role of the Housing Enabling function in securing revenue funding streams and agreements over void loss.</p> <p>3.28 Wheelchair accessible accommodation (especially for families) often requires bespoke design to meet the specific needs of potential tenants. In some instances, this means that provision is better made by RPs. It may therefore be appropriate in such circumstances to</p>	<p>3.20 - Chapter 6 provides more guidance on bringing forward exception sites including the role of the Council's housing enabling function in supporting exception sites coming forward. However, at the planning stage it will be for the applicant to demonstrate the need that will be addressed.</p> <p>3.24 - The starting point of the Local Plan policies and paragraph 63 of the NPPF is that affordable housing is provided on site. Chapter 5 of the SPD provides guidance on commuted sums and acknowledges that there could be circumstances where affordable housing cannot feasibly be provided on site.</p> <p>3.25 - It is acknowledged that as drafted the paragraph suggests that identifying a need is the only consideration. The paragraph has therefore been amended to remove the assumption that if needs for affordable specialist accommodation exist they would be provided for, on any non-specialist housing developments, in reflection of the fact that specialist needs form one element of the needs for accommodation for older people.</p>	

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		seek off site provision via commuted sums.	3.28 – Chapter 5 acknowledges that there may be circumstances where a commuted sum is preferable which includes “circumstances where the Council considers that a contribution could enable delivery of a better affordable solution”. The circumstances explained by the respondent could fall into this category.	
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	46	<p>3.1 and 3.6 - concerned that the primary driver for affordable mix is the Strategic Housing Market Assessment. Far more emphasis should be placed on the Choice Based Lettings register and experience of Registered Providers in letting homes.</p> <p>3.7 / 3.8 - the proposal to displace discounted market housing in the Suffolk Coastal area and half of the intermediate low cost housing in the Waveney area with First Homes is contrary to the Planning Practice Guidance on First Homes (paragraph 70-015-20210524).</p> <p>3.15 - It would be hoped summaries of the housing register data could be made available to inform early decision making.</p> <p>3.16 - Registered Providers might provide</p>	<p>3.1 and 3.6 - The Strategic Housing Market Assessment has informed the tenure split in policies SCLP5.10 and WLP8.2, which the SPD is providing further guidance on. Paragraph 3.15 sets out that the Housing Register should be considered alongside the SHMA.</p> <p>3.7 / 3.8 - First Homes are a type of discounted market housing. The examples included in paragraph 70-015-20210524 of the PPG relate to policies that specify types of affordable housing that would not relate to provision of First Homes. This does not apply in the case of the Suffolk Coastal Local Plan and the Waveney Local Plan. Amendments have been made to paragraphs 2.6, 2.9 and 3.7 – 3.10 of the SPD for clarity.</p> <p>3.16 - Reference to Registered Providers</p>	<p>Paragraphs 2.6, 2.9 and 3.7 - 3.10 – amendments made for clarity as to how the First Homes policy relates to the adopted Local Plan policies.</p> <p>3.15 – Text added “The Housing Enabling Team can be contacted for information on the data held on the Housing Register.”</p> <p>3.16 - Text added at the end of the paragraph- "and/or through Registered Providers."</p> <p>3.25 (now 3.26) - Text amended to state "that could" rather than "to" in the third sentence.</p>

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		<p>better information than Help to Buy Agents.</p> <p>3.20 Registered Providers should be encouraged to bring forward Exception Sites, the responsibility of identifying needs should be shared with the Housing Enabling function.</p> <p>3.24. It is almost certain that to practically deliver such schemes (C2) in a way that management arrangements work, affordable housing is delivered off site via commuted sums, unless the scheme is brought forward by an RP.</p> <p>3.25. The bringing forward of such projects (affordable specialist housing) is complex and can't simply be a response to housing need. Revenue funding support must be available (Adult Social Care) and the risks acceptable to RPs. These points need to be picked up in the SPD, including the role of the Housing Enabling function in securing revenue funding streams and agreements over void loss.</p> <p>3.28 Wheelchair accessible accommodation (especially for families) often requires bespoke design to meet</p>	<p>having information on needs for affordable home ownership dwellings has been added to paragraph 3.16.</p> <p>3.20 - Chapter 6 provides more guidance on bringing forward exception sites including the role of the Council's housing enabling function in supporting exception sites coming forward. However, at the planning stage it will be for the applicant to demonstrate the need that will be addressed.</p> <p>3.24 - The starting point of the Local Plan policies and paragraph 63 of the NPPF is that affordable housing is provided on site. Chapter 5 of the SPD provides guidance on commuted sums and acknowledges that there could be circumstances where affordable housing cannot feasibly be provided on site.</p> <p>3.25 - It is acknowledged that as drafted the paragraph suggests that identifying a need is the only consideration. The paragraph has therefore been amended to remove the assumption that if needs for affordable specialist accommodation exist they would be provided for, on any non-specialist housing developments, in reflection of the fact that specialist needs</p>	

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		<p>the specific needs of potential tenants. In some instances, this means that provision is better made by RPs. It may therefore be appropriate in such circumstances to seek off site provision via commuted sums.</p>	<p>form one element of the needs for accommodation for older people.</p> <p>3.28 – Chapter 5 acknowledges that there may be circumstances where a commuted sum is preferable which includes “circumstances where the Council considers that a contribution could enable delivery of a better affordable solution”. The circumstances explained by the respondent could fall into this category.</p>	
<p>Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>58</p>	<p>3.1 and 3.6 - concerned that the primary driver for affordable mix is the Strategic Housing Market Assessment. Far more emphasis should be placed on the Choice Based Lettings register and experience of Registered Providers in letting homes.</p> <p>3.7 / 3.8 - the proposal to displace discounted market housing in the Suffolk Coastal area and half of the intermediate low cost housing in the Waveney area with First Homes is contrary to the Planning Practice Guidance on First Homes (paragraph 70-015-20210524).</p> <p>3.15 - It would be hoped summaries of the housing register data could be made available to inform early decision making.</p>	<p>3.1 and 3.6 - The Strategic Housing Market Assessment has informed the tenure split in policies SCLP5.10 and WLP8.2, which the SPD is providing further guidance on. Paragraph 3.15 sets out that the Housing Register should be considered alongside the SHMA.</p> <p>3.7 / 3.8 - First Homes are a type of discounted market housing. The examples included in paragraph 70-015-20210524 of the PPG relate to policies that specify types of affordable housing that would not relate to provision of First Homes. This does not apply in the case of the Suffolk Coastal Local Plan and the Waveney Local Plan. Amendments have been made to paragraphs 2.6, 2.9 and 3.7 – 3.10 of the SPD for clarity.</p>	<p>Paragraphs 2.6, 2.9 and 3.7 - 3.10 – amendments made for clarity as to how the First Homes policy relates to the adopted Local Plan policies.</p> <p>3.15 – Text added “The Housing Enabling Team can be contacted for information on the data held on the Housing Register.”</p> <p>3.16 - Text added at the end of the paragraph- "and/or through Registered Providers."</p> <p>3.25 (now 3.26) - Text amended to state "that could"</p>

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		<p>3.16 - Registered Providers might provide better information than Help to Buy Agents.</p> <p>3.20 Registered Providers should be encouraged to bring forward Exception Sites, the responsibility of identifying needs should be shared with the Housing Enabling function.</p> <p>3.24. It is almost certain that to practically deliver such schemes (C2) in a way that management arrangements work, affordable housing is delivered off site via commuted sums, unless the scheme is brought forward by an RP.</p> <p>3.25. The bringing forward of such projects (affordable specialist housing) is complex and can't simply be a response to housing need. Revenue funding support must be available (Adult Social Care) and the risks acceptable to RPs. These points need to be picked up in the SPD, including the role of the Housing Enabling function in securing revenue funding streams and agreements over void loss.</p> <p>3.28 Wheelchair accessible</p>	<p>3.16 - Reference to Registered Providers having information on needs for affordable home ownership dwellings has been added to paragraph 3.16.</p> <p>3.20 - Chapter 6 provides more guidance on bringing forward exception sites including the role of the Council's housing enabling function in supporting exception sites coming forward. However, at the planning stage it will be for the applicant to demonstrate the need that will be addressed.</p> <p>3.24 - The starting point of the Local Plan policies and paragraph 63 of the NPPF is that affordable housing is provided on site. Chapter 5 of the SPD provides guidance on commuted sums and acknowledges that there could be circumstances where affordable housing cannot feasibly be provided on site.</p> <p>3.25 - It is acknowledged that as drafted the paragraph suggests that identifying a need is the only consideration. The paragraph has therefore been amended to remove the assumption that if needs for affordable specialist accommodation exist they would be provided for, on any</p>	<p>rather than "to" in the third sentence.</p>

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		<p>accommodation (especially for families) often requires bespoke design to meet the specific needs of potential tenants. In some instances, this means that provision is better made by RPs. It may therefore be appropriate in such circumstances to seek off site provision via commuted sums.</p>	<p>non-specialist housing developments, in reflection of the fact that specialist needs form one element of the needs for accommodation for older people.</p> <p>3.28 – Chapter 5 acknowledges that there may be circumstances where a commuted sum is preferable which includes “circumstances where the Council considers that a contribution could enable delivery of a better affordable solution”. The circumstances explained by the respondent could fall into this category.</p>	
<p>Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>69</p>	<p>3.1 and 3.6 – concerned that the primary driver for affordable mix is the Strategic Housing Market Assessment. Far more emphasis should be placed on the Choice Based Lettings register and experience of Registered Providers in letting homes.</p> <p>3.7 / 3.8 – the proposal to displace discounted market housing in the Suffolk Coastal area and half of the intermediate low cost housing in the Waveney area with First Homes is contrary to the Planning Practice Guidance on First Homes (paragraph 70-015-20210524).</p> <p>3.15 – It would be hoped summaries of</p>	<p>3.1 and 3.6 – The Strategic Housing Market Assessment has informed the tenure split in policies SCLP5.10 and WLP8.2, which the SPD is providing further guidance on. Paragraph 3.15 sets out that the Housing Register should be considered alongside the SHMA.</p> <p>3.7 / 3.8 - First Homes are a type of discounted market housing. The examples included in paragraph 70-015-20210524 of the PPG relate to policies that specify types of affordable housing that would not relate to provision of First Homes. This does not apply in the case of the Suffolk Coastal Local Plan and the Waveney Local Plan. Amendments have</p>	<p>Paragraphs 2.6, 2.9 and 3.7 - 3.10 – amendments made for clarity as to how the First Homes policy relates to the adopted Local Plan policies.</p> <p>3.15 – Text added “The Housing Enabling Team can be contacted for information on the data held on the Housing Register.”</p> <p>3.16 - Text added at the end of the paragraph- "and/or through Registered Providers."</p> <p>3.25 (now 3.26) - Text</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>the housing register data could be made available to inform early decision making.</p> <p>3.16 – Registered Providers might provide better information than Help to Buy Agents.</p> <p>3.20 Registered Providers should be encouraged to bring forward Exception Sites, the responsibility of identifying needs should be shared with the Housing Enabling function.</p> <p>3.24. It is almost certain that to practically deliver such schemes (C2) in a way that management arrangements work, affordable housing is delivered off site via commuted sums, unless the scheme is brought forward by an RP.</p> <p>3.25. The bringing forward of such projects (affordable specialist housing) is complex and can't simply be a response to housing need. Revenue funding support must be available (Adult Social Care) and the risks acceptable to RPs. These points need to be picked up in the SPD, including the role of the Housing Enabling function in securing revenue funding streams and agreements over void loss.</p>	<p>been made to paragraphs 2.6, 2.9 and 3.7 – 3.10 of the SPD for clarity.</p> <p>3.16 – Reference to Registered Providers having information on needs for affordable home ownership dwellings has been added to paragraph 3.16.</p> <p>3.20 – Chapter 6 provides more guidance on bringing forward exception sites including the role of the Council's housing enabling function in supporting exception sites coming forward. However, at the planning stage it will be for the applicant to demonstrate the need that will be addressed.</p> <p>3.24 – The starting point of the Local Plan policies and paragraph 63 of the NPPF is that affordable housing is provided on site. Chapter 5 of the SPD provides guidance on commuted sums and acknowledges that there could be circumstances where affordable housing cannot feasibly be provided on site.</p> <p>3.25 – It is acknowledged that as drafted the paragraph suggests that identifying a need is the only consideration. The paragraph has therefore been amended to remove the assumption that if needs</p>	<p>amended to state "that could" rather than "to" in the third sentence.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>3.28 Wheelchair accessible accommodation (especially for families) often requires bespoke design to meet the specific needs of potential tenants. In some instances, this means that provision is better made by RPs. It may therefore be appropriate in such circumstances to seek off site provision via commuted sums.</p>	<p>for affordable specialist accommodation exist they would be provided for, on any non-specialist housing developments, in reflection of the fact that specialist needs form one element of the needs for accommodation for older people.</p> <p>3.28 - Chapter 5 acknowledges that there may be circumstances where a commuted sum is preferable which includes “circumstances where the Council considers that a contribution could enable delivery of a better affordable solution”. The circumstances explained by the respondent could fall into this category.</p>	
<p>Pigeon Investment Management (Snowling, Rob)</p>	<p>27</p>	<p>It is not clear why the Council has chosen to exclude discounted market sales housing rather than affordable rent or Shared Ownership. First Homes are a different product to discounted market sales. The SPD should allow for the full range of affordable housing needs to be met so access to home ownership is not restricted.</p> <p>Paragraph 3.15 implies that the default position will be to apply the mix as set out in the SHMA unless more up to date housing needs evidence can be provided. There should be flexibility for site specific</p>	<p>The PPG states that First Homes are a form of discounted market sales housing. Affordable Rent and Shared Ownership are different forms of affordable housing. Amendments have been made to paragraphs 2.6, 2.9 and 3.7 – 3.10 of the SPD to explain the application of the First Homes policy alongside the existing Local Plan policies.</p> <p>It is agreed that there could be site specific considerations that may inform the affordable housing mix, and reference to this has been included in new paragraph 3.18.</p>	<p>Paragraphs 2.6, 2.9 and 3.7 - 3.10 – amendments made for clarity as to how the First Homes policy relates to the adopted Local Plan policies.</p> <p>New paragraph 3.18 added to refer to site specific considerations that may influence affordable housing mix.</p> <p>Paragraph 3.20 (now 3.21) - cross-reference to chapter 6 added.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>considerations such as design and site context.</p> <p>Paragraph 3.20 refers to meeting a local need, however the SPD doesn't define 'local housing need'. This should be affordable housing that meets the needs of people living within the district and those that have an association with the area or people who are eligible to bid for affordable homes to rent in accordance with the Council's choice-based letting scheme.</p> <p>Paragraph 3.24 - clarification should be provided that other forms of specialist accommodation that have robust characteristics of a C2 use (such as assisted living apartments where residents rely on access to communal facilities to meet their day-to-day needs) will not be required to provide affordable housing.</p> <p>Paragraph 3.28 doesn't contain any details of when M4(3) may be required and what proportion the Council may seek. Further clarification should be provided and should be cross-referenced with assumptions made in the whole plan</p>	<p>Paragraph 3.15 – Paragraph 3.3 states that the SHMA should be used alongside other evidence also set out in the Chapter.</p> <p>Paragraph 3.20 contains a cross-reference to Chapter 8 which provides more detailed guidance on undertaking a local housing needs assessment. Chapter 6 also contains an explanation of what is meant by local need in respect of the policies on exception sites, and a cross reference to chapter 6 will therefore also be included for clarity.</p> <p>Paragraph 3.24 - the policies in the Local Plan do not distinguish between C2 and C3 and therefore developments such as assisted living apartments, which are individual units of accommodation albeit that there may be communal facilities and care provided, would be expected to provide affordable units.</p> <p>Paragraph 3.28 - it is acknowledged that the Local Plan policies do not require a proportion of M4(3) to be provided and it would not therefore be appropriate for a requirement to be set out in the SPD. However, given that there is a need for</p>	

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		viability work that supported the Local Plans.	M4(3) affordable properties on the Housing Register the SPD is setting out that in some circumstances the Council may ask for M4(3) to meet a need and would consider varying the overall affordable requirement if necessary.	
Suffolk County Council (Clow, Cameron)	23	<p>Welcome reference to specialist housing in the SPD. There is a need across the county for specialist housing. Paragraph 3.22 should also include reference to the needs for affordable specialist housing in the Waveney Local Plan area. These are set out in the SHMA, and more recent figures are contained in the State of Suffolk report.</p> <p>Paragraph 3.24 could be interpreted to mean that C2 uses which are residential care will not have the affordable housing policies applied to them. The SPD should explicitly state that affordable housing policies will apply to residential care.</p>	<p>The SHMA doesn't set out the affordable needs in the Waveney area, this was disaggregated for Suffolk Coastal through additional work undertaken as part of the Examination. The needs set out in the State of Suffolk report are noted however the needs assessed through the SHMA are those which have informed the Local Plans.</p> <p>3.24 - the Council's planning policies in relation to securing affordable housing are policies SCLP5.10 and WLP8.2. These policies require affordable housing for sites of 10 units or more / 11 dwellings or more (respectively) and there is therefore no policy basis for requiring affordable housing on developments that are not dwellings.</p>	No changes needed
Suffolk County Council (Clow, Cameron)	24	Paragraph 3.27 - it is assumed that in the case of the Suffolk Coastal Local Plan equitable distribution would mean 50% of market and 50% of affordable housing would be M4(2). However consideration should be given to a more nuanced approach and potentially a greater	It is recognised that generally there may be a greater need for M4(2) properties in the affordable sector. The SPD has therefore been amended to reflect this and to expect a higher proportion in the affordable dwellings, but with the precise	Paragraph 3.27 (now 3.28) has been amended to include reference to a higher proportion of the M4(2) requirement being sought in affordable housing.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		proportion of M4(2) affordable may be needed.	split to be determined on a case by case basis.	

4. Section 106 agreements

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	101	<p>Phasing of the delivery of the affordable housing should allow flexibility to improve viability.</p> <p>The requirement to name the Registered Provider in the affordable housing scheme at application stage is not practical.</p>	<p>The Model Heads of Terms and Template Clauses in Appendix 2 allow for phasing where sufficient justification is provided (paragraph 7 of Model Heads of Terms).</p> <p>The SPD recognises the benefits of early engagement with Registered Providers and encourages this in paragraph 4.10. However, an amendment has been made to the Model Heads of Terms to require the name and registration number of the registered provider in the Affordable Housing Scheme only if known.</p>	No changes needed

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	98	S106 triggers should be flexible in terms of negotiating with an RP, particularly on larger developments where a phased delivery may be necessary.	The Model Heads of Terms and Template Clauses (Appendix 2, paragraph 6) provide flexibility by stating that evidence demonstrating negotiations are in hand could be provided where a contract hasn't yet been entered into.	No changes needed.
Badger Building (E. Anglia) Ltd (Coote, Justin)	99	With an outline application there must remain flexibility around the types, size, location and tenure of the affordable housing, due to the time lapse from outline to delivery.	Paragraph 4.11 states that percentages rather than absolute numbers would be acceptable where this is still to be confirmed at reserved matters stage. In Appendix 2, the template definition for 'Affordable Housing Table' allows for 'unless otherwise agreed with the Council', which provides some flexibility. At Outline stage the requirement relates to percentages rather than numbers. The Affordable Housing Scheme would not need to be submitted until Reserved Matters stage and there is provision for a differing mix to be submitted at that stage under the definition of 'Affordable Housing Scheme'. The reason for seeking this information at Outline stage is to enable the proposals to be considered in the light of the Local Plan policies on affordable housing.	No changes needed.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	81	<p>4.10. On larger schemes further trigger points would be necessary to stagger development delivery (perhaps at 60 & 75%).</p> <p>4.11 There needs to be flexibility with the housing mix and location allowing for circumstances to evolve between the pre-application stage and delivery, particularly problematic on larger strategic schemes and schemes that are submitted as outline applications. Over the life of a strategic project the time between an outline planning application and 1st occupations can be lengthy. Many intermediate market tenures, for example, only work in practice if sufficient mortgage products exist at an affordable rate in the lending market.</p> <p>4.23. Developers seek offers from RP's, who compete against each other in making offers (should more than one seek the scheme). Generally, the developer selects the RP who is the most competitive. Developers don't market homes at an asking price. It would be more appropriate to refer to the need for developers to seek reasonable offers from RPs.</p>	<p>4.10 - Template Covenant 1.4 provides for circumstances where another approach is agreed with the Council. For larger schemes it is still considered important to ensure that a Registered Provider is engaged by 40% delivery of market homes as far as possible even if the delivery of those affordable homes is to be staggered to ensure that the affordable housing can be delivered in a timely manner.</p> <p>4.11 - It is noted that circumstances may evolve, and paragraph 4.11 therefore provides greater flexibility for outline and larger phased sites in terms of the information expected to be submitted.</p> <p>4.23 - It is noted that the wording was not clear in terms of process and it is agreed this should be amended.</p>	<p>4.11 – Amendments made in relation to submission of information.</p> <p>4.23 (now 4.24) - Amendments have been made to more accurately reflect the process by which RPs make offers for affordable housing.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	37	<p>4.10. On larger schemes further trigger points would be necessary to stagger development delivery (perhaps at 60 & 75%).</p> <p>4.11 There needs to be flexibility with the housing mix and location allowing for circumstances to evolve between the pre-application stage and delivery, particularly problematic on larger strategic schemes and schemes that are submitted as outline applications. Over the life of a strategic project the time between an outline planning application and 1st occupations can be lengthy. Many intermediate market tenures, for example, only work in practice if sufficient mortgage products exist at an affordable rate in the lending market.</p> <p>4.23. Developers seek offers from RP's, who compete against each other in making offers (should more than one seek the scheme). Generally, the developer selects the RP who is the most competitive. Developers don't market homes at an asking price. It would be more appropriate to refer to the need for developers to seek reasonable offers from RP's.</p>	<p>4.10 - Template Covenant 1.4 provides for circumstances where another approach is agreed with the Council. For larger schemes it is still considered important to ensure that a Registered Provider is engaged by 40% delivery of market homes as far as possible even if the delivery of those affordable homes is to be staggered to ensure that the affordable housing can be delivered in a timely manner.</p> <p>4.11 - It is noted that circumstances may evolve, and paragraph 4.11 therefore provides greater flexibility for outline and larger phased sites in terms of the information expected to be submitted.</p> <p>4.23 - It is noted that the wording was not clear in terms of process and it is agreed this should be amended.</p>	<p>4.11 – Amendments made in relation to submission of information.</p> <p>4.23 (now 4.24) - Amendments have been made to more accurately reflect the process by which RPs make offers for affordable housing.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
<p>Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>47</p>	<p>4.10. On larger schemes further trigger points would be necessary to stagger development delivery (perhaps at 60 & 75%).</p> <p>4.11 There needs to be flexibility with the housing mix and location allowing for circumstances to evolve between the pre-application stage and delivery, particularly problematic on larger strategic schemes and schemes that are submitted as outline applications. Over the life of a strategic project the time between an outline planning application and 1st occupations can be lengthy. Many intermediate market tenures, for example, only work in practice if sufficient mortgage products exist at an affordable rate in the lending market.</p> <p>4.23. Developers seek offers from RP's, who compete against each other in making offers (should more than one seek the scheme). Generally, the developer selects the RP who is the most competitive. Developers don't market homes at an asking price. It would be more appropriate to refer to the need for developers to seek reasonable offers from RPs.</p>	<p>4.10 - Template Covenant 1.4 provides for circumstances where another approach is agreed with the Council. For larger schemes it is still considered important to ensure that a Registered Provider is engaged by 40% delivery of market homes as far as possible even if the delivery of those affordable homes is to be staggered to ensure that the affordable housing can be delivered in a timely manner.</p> <p>4.11 - It is noted that circumstances may evolve, and paragraph 4.11 therefore provides greater flexibility for outline and larger phased sites in terms of the information expected to be submitted.</p> <p>4.23 - It is noted that the wording was not clear in terms of process and it is agreed this should be amended.</p>	<p>4.11 – Amendments made in relation to submission of information.</p> <p>4.23 (now 4.24) - Amendments have been made to more accurately reflect the process by which RPs make offers for affordable housing.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	59	<p>4.10. On larger schemes further trigger points would be necessary to stagger development delivery (perhaps at 60 & 75%).</p> <p>4.11 There needs to be flexibility with the housing mix and location allowing for circumstances to evolve between the pre-application stage and delivery, particularly problematic on larger strategic schemes and schemes that are submitted as outline applications. Over the life of a strategic project the time between an outline planning application and 1st occupations can be lengthy. Many intermediate market tenures, for example, only work in practice if sufficient mortgage products exist at an affordable rate in the lending market.</p> <p>4.23. Developers seek offers from RP's, who compete against each other in making offers (should more than one seek the scheme). Generally, the developer selects the RP who is the most competitive. Developers don't market homes at an asking price. It would be more appropriate to refer to the need for developers to seek reasonable offers from RPs.</p>	<p>4.10 - Template Covenant 1.4 provides for circumstances where another approach is agreed with the Council. For larger schemes it is still considered important to ensure that a Registered Provider is engaged by 40% delivery of market homes as far as possible even if the delivery of those affordable homes is to be staggered to ensure that the affordable housing can be delivered in a timely manner.</p> <p>4.11 - It is noted that circumstances may evolve, and paragraph 4.11 therefore provides greater flexibility for outline and larger phased sites in terms of the information expected to be submitted.</p> <p>4.23 - It is noted that the wording was not clear in terms of process and it is agreed this should be amended.</p>	<p>4.11 – Amendments made in relation to submission of information.</p> <p>4.23 (now 4.24) - Amendments have been made to more accurately reflect the process by which RPs make offers for affordable housing.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	70	<p>4.10. On larger schemes further trigger points would be necessary to stagger development delivery (perhaps at 60 & 75%).</p> <p>4.11 There needs to be flexibility with the housing mix and location allowing for circumstances to evolve between the pre-application stage and delivery, particularly problematic on larger strategic schemes and schemes that are submitted as outline applications. Over the life of a strategic project the time between an outline planning application and 1st occupations can be lengthy. Many intermediate market tenures, for example, only work in practice if sufficient mortgage products exist at an affordable rate in the lending market.</p> <p>4.23. Developers seek offers from RP's, who compete against each other in making offers (should more than one seek the scheme). Generally, the developer selects the RP who is the most competitive. Developers don't market homes at an asking price. It would be more appropriate to refer to the need for developers to seek reasonable offers from RP's.</p>	<p>4.10 - Template Covenant 1.4 provides for circumstances where another approach is agreed with the Council. For larger schemes it is still considered important to ensure that a Registered Provider is engaged by 40% delivery of market homes as far as possible even if the delivery of those affordable homes is to be staggered to ensure that the affordable housing can be delivered in a timely manner.</p> <p>4.11 - It is noted that circumstances may evolve, and paragraph 4.11 therefore provides greater flexibility for outline and larger phased sites in terms of the information expected to be submitted.</p> <p>4.23 - It is noted that the wording was not clear in terms of process and it is agreed this should be amended.</p>	<p>4.11 – Amendments made in relation to submission of information.</p> <p>4.23 (now 4.24) - Amendments have been made to more accurately reflect the process by which RPs make offers for affordable housing.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Ipswich and East Suffolk Clinical Commissioning Group	89	Consideration should be given to enabling Section 106 agreements to include land for Health Key Worker affordable homes where it is appropriate and reasonable to do so. Evidence would be sought through the Needs Assessment which the CCG will be carrying out in Q4 21/22.	The Council, through its regular dialogue with the CCG, will be pleased to receive further information and outputs of this work. The SPD itself however provides guidance on the implementation of existing policies. The PPG on First Homes sets out that authorities can prioritise key workers for First Homes. It states that the definition of a key worker should be determined locally and could be any person who works in any profession that is considered essential for the functioning of a local area. Should the Council seek to define key worker and prioritise affordable housing accordingly this would appropriately be considered on a comprehensive basis and is likely to be most appropriately considered as part of the evidencing of future Local Plan policy rather than through an SPD.	No changes needed.
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	109	Nomination provisions for specialist housing will not be via Choice Based Lettings, but Adult Social Care – which needs inclusion at 4.16/4.17	Reference to nominations for specialist affordable housing being via Adult Social Care has been added to paragraph 4.16.	The following sentence has been added to 4.16: "For specialist housing, nominations are via Adult Social Care, Suffolk County Council."

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	106	Nomination provisions for specialist housing will not be via Choice Based Lettings, but Adult Social Care – which needs inclusion at 4.16/4.17	Reference to nominations for specialist affordable housing being via Adult Social Care has been added to paragraph 4.16.	The following sentence has been added to 4.16: "For specialist housing, nominations are via Adult Social Care, Suffolk County Council."
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	108	Nomination provisions for specialist housing will not be via Choice Based Lettings, but Adult Social Care – which needs inclusion at 4.16/4.17	Reference to nominations for specialist affordable housing being via Adult Social Care has been added to paragraph 4.16.	The following sentence has been added to 4.16: "For specialist housing, nominations are via Adult Social Care, Suffolk County Council."
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	105	Nomination provisions for specialist housing will not be via Choice Based Lettings, but Adult Social Care – which needs inclusion at 4.16/4.17	Reference to nominations for specialist affordable housing being via Adult Social Care has been added to paragraph 4.16.	The following sentence has been added to 4.16: "For specialist housing, nominations are via Adult Social Care, Suffolk County Council."

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	107	Nomination provisions for specialist housing will not be via Choice Based Lettings, but Adult Social Care – which needs inclusion at 4.16/4.17	Reference to nominations for specialist affordable housing being via Adult Social Care has been added to paragraph 4.16.	The following sentence has been added to 4.16: "For specialist housing, nominations are via Adult Social Care, Suffolk County Council."
Pigeon Investment Management (Snowling, Rob)	28	<p>Paragraph 4.10 - There should be scope for an alternative percentage to be agreed with the Council, rather than applying a blanket approach to all schemes, to avoid unnecessarily delaying scheme delivery where the Council and the owner are in agreement that an alternative percentage would be acceptable. For example, this might reflect the construction phasing of an approved scheme.</p> <p>Paragraph 4.17 - The requirement to agree a procedure for verifying DMS purchasers potentially introduces an unnecessary delay to scheme delivery. The Council should provide further clarity on what is likely to be an acceptable mechanism for verifying DMS purchasers and set this out within the Model Heads of Terms.</p>	<p>Paragraph 4.10 - Template Covenant 1.4 in Appendix 2 provides for some flexibility through reference to agreeing an alternative approach with the Council.</p> <p>Paragraph 4.17 – The Council is drafting a process and this will be published on the website.</p> <p>Paragraph 4.18 - The word exceptional reinforces that the Model Heads of Terms and Template clauses are those that the Council would seek to use. The Model Heads of Terms and Template Clauses themselves contain provision for alternative approaches such as Template Covenant 1.4 in Appendix 2.</p> <p>Paragraph 4.19 - The Model Heads of Terms and Template clauses will apply to First Homes. The Government's Template Clauses were published in December 2021 and have been integrated into the Model Heads of Terms and Template</p>	<p>Paragraph 4.17 – wording has been added to explain that the Council is drafting a process and this will be published on the website.</p> <p>Paragraph 4.19 (now 4.20) – wording has been added to reflect the publication of the Government's First Homes Template Clauses.</p> <p>Paragraph 4.22 (now 4.23) - Wording has been added to clarify that the reference to viability assessment relates to proposals that would result in a lower or non-policy compliant provision of affordable housing.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>In Paragraph 4.18 the reference to ‘exceptional circumstances’ introduces an unnecessarily high bar. Paragraph 4.18 should be amended to state that the Council will expect the Model Heads of Terms to be applied. However, an alternative approach will be agreed where this can be demonstrated to be appropriate and it will not prejudice the delivery of affordable housing.</p> <p>Paragraph 4.19 sets out that the Council will consider using the Government’s template planning obligation for First Homes, once published. We would suggest that the Council should consider setting out its own Model Heads of Terms for First Homes that could be used as an interim approach to avoid delays.</p> <p>Paragraph 4.22 states that where a developer wishes to vary the number or mix of affordable dwellings set out in a S106 agreement, the Council will require a viability assessment. There are a number of potential scenarios where it may be necessary to change the housing mix for a scheme post approval, such as to reflect changing housing needs, for</p>	<p>Clauses in Appendix 2 of the SPD. Reference that the Council has applied the Government’s template clauses has been included in paragraph 4.19.</p> <p>Paragraph 4.22 - The paragraph is aimed at situations where an applicant or developer wishes to vary the requirement and this would result in an amount or mix that is not policy compliant, and it is agreed the paragraph could be clearer.</p>	

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>example. It is unclear why a viability assessment would be required in this instance, if both the Council and the owner were in agreement over the variation. There may also be circumstances where it is necessary to vary the number of affordable homes where the number of dwellings is an 'up to' figure. As such, we would suggest that applying a blanket requirement for viability assessment is inappropriate.</p>		
<p>Reydon Parish Council (O'Hear, Philip)</p>	<p>16</p>	<p>S106 agreements must be carefully drafted and rigorously enforced.</p>	<p>The SPD sets out guidance on Section 106 agreements and Model Heads of Terms and Template Clauses to assist with the drafting and enforcing of agreements.</p>	<p>No changes needed.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Woodbridge Society (Vaughan, Alan)	18	<p>Paragraph 4.5 recognises that it may not always be possible for affordable housing to be provided on sites of 10 dwellings or more. However this could result in the required amount of affordable housing not being provided.</p> <p>Such 'off-site' provision should be exceptional. Planning permission should not be granted until a site for affordable housing has been identified and the required payment calculated. Such arrangements should be transparent and made public. All such arrangements should be agreed by the Planning Committee.</p>	<p>Paragraph 5.4 (now 5.5) of the SPD explains that contributions will be based on the open market plot values for the size of dwellings that would have been required. The required payment would be secured through the Section 106 agreement and therefore permission will not be granted without legal commitment to the payment. The Council is in the process of developing a policy for spending commuted sums to ensure that affordable housing is provided in a timely manner where financial contributions have been received.</p>	No changes needed.

5. Financial contributions

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	102	The commuted sum calculation based on open market plot values seems flawed. Being based on serviced plot values is not a comparable means to determine the commuted sums.	The respondent has not provided an alternative method for determining commuted sums or set out why they consider the approach to be flawed. The approach is a continuation of the Council's current approach and reflects the costs a Registered Provider may expect to pay when purchasing affordable dwellings on site. An explanation has been added to paragraph 5.4 (now 5.5).	Paragraph 5.4 (now 5.5) – explanation added as to rationale for approach to calculating commuted sums.
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	82	5.4. It could be clearer that off-site provision via commuted sums is equal to serviced plot values published by the council on an annual basis. This presents two problems: The commuted sum would be expected to replace grant funding. It is unlikely that with a free serviced plot a Registered Provider could deliver the design and build of the home (in current market conditions) on a grant free basis. The current serviced plot values are considered too high. The demand from Registered Providers for small schemes of affordable housing	It is agreed that further explanation could be added to explain the basis of the calculation. Local Plan policies SCLP5.10 and WLP8.2 provide for financial contributions where it is not feasible to provide affordable housing on site. This is consistent with paragraph 63 of the NPPF.	Amendments have been made to paragraph 5.4 (now 5.5) to further explain the basis of the commuted sum calculation.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		<p>under 5 homes is extremally low, and offer prices tend to also be negatively affected impacting on viability. Schemes of apartments, retirement housing schemes and other instances such as schemes where the design drives high service charges, or maintenance costs are examples where commuted sums may be more sensibly received.</p>		
<p>Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>38</p>	<p>5.4. It could be clearer that off-site provision via commuted sums is equal to serviced plot values published by the council on an annual basis. This presents two problems: The commuted sum would be expected to replace grant funding. It is unlikely that with a free serviced plot a Registered Provider could deliver the design and build of the home (in current market conditions) on a grant free basis. The current serviced plot values are considered too high. The demand from Registered Providers for small schemes of affordable housing under 5 homes is extremally low, and</p>	<p>It is agreed that further explanation could be added to explain the basis of the calculation.</p> <p>Local Plan policies SCLP5.10 and WLP8.2 provide for financial contributions where it is not feasible to provide affordable housing on site. This is consistent with paragraph 63 of the NPPF.</p>	<p>Amendments have been made to paragraph 5.4 (now 5.5) to further explain the basis of the commuted sum calculation.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		offer prices tend to also be negatively affected impacting on viability. Schemes of apartments, retirement housing schemes and other instances such as schemes where the design drives high service charges, or maintenance costs are examples where commuted sums may be more sensibly received.		
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	48	<p>5.4. It could be clearer that off-site provision via commuted sums is equal to serviced plot values published by the council on an annual basis. This presents two problems:</p> <p>The commuted sum would be expected to replace grant funding. It is unlikely that with a free serviced plot a Registered Provider could deliver the design and build of the home (in current market conditions) on a grant free basis. The current serviced plot values are considered too high.</p> <p>The demand from Registered Providers for small schemes of affordable housing under 5 homes is extremally low, and offer prices tend to also be negatively affected impacting on viability. Schemes of apartments, retirement housing schemes and other instances such as schemes where the design drives high service charges, or maintenance costs</p>	<p>It is agreed that further explanation could be added to explain the basis of the calculation.</p> <p>Local Plan policies SCLP5.10 and WLP8.2 provide for financial contributions where it is not feasible to provide affordable housing on site. This is consistent with paragraph 63 of the NPPF.</p>	<p>Amendments have been made to paragraph 5.4 (now 5.5) to further explain the basis of the commuted sum calculation.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		are examples where commuted sums may be more sensibly received.		

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	60	<p>5.4. It could be clearer that off-site provision via commuted sums is equal to serviced plot values published by the council on an annual basis. This presents two problems:</p> <p>The commuted sum would be expected to replace grant funding. It is unlikely that with a free serviced plot a Registered Provider could deliver the design and build of the home (in current market conditions) on a grant free basis. The current serviced plot values are considered too high.</p> <p>The demand from Registered Providers for small schemes of affordable housing under 5 homes is extremally low, and offer prices tend to also be negatively affected impacting on viability. Schemes of apartments, retirement housing schemes and other instances such as schemes where the design drives high service charges, or maintenance costs are examples where commuted sums may be more sensibly received.</p>	<p>It is agreed that further explanation could be added to explain the basis of the calculation.</p> <p>Local Plan policies SCLP5.10 and WLP8.2 provide for financial contributions where it is not feasible to provide affordable housing on site. This is consistent with paragraph 63 of the NPPF.</p>	<p>Amendments have been made to paragraph 5.4 (now 5.5) to further explain the basis of the commuted sum calculation.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	71	<p>5.4. It could be clearer that off-site provision via commuted sums is equal to serviced plot values published by the council on an annual basis. This presents two problems:</p> <p>The commuted sum would be expected to replace grant funding. It is unlikely that with a free serviced plot a Registered Provider could deliver the design and build of the home (in current market conditions) on a grant free basis. The current serviced plot values are considered too high.</p> <p>The demand from Registered Providers for small schemes of affordable housing under 5 homes is extremally low, and offer prices tend to also be negatively affected impacting on viability. Schemes of apartments, retirement housing schemes and other instances such as schemes where the design drives high service charges, or maintenance costs are examples where commuted sums may be more sensibly received.</p>	<p>It is agreed that further explanation could be added to explain the basis of the calculation.</p> <p>Local Plan policies SCLP5.10 and WLP8.2 provide for financial contributions where it is not feasible to provide affordable housing on site. This is consistent with paragraph 63 of the NPPF.</p>	<p>Amendments have been made to paragraph 5.4 (now 5.5) to further explain the basis of the commuted sum calculation.</p>

6. Exception Sites

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Beavan, David (East Suffolk Councillor)	5	6.3 - can it be clarified whether ordinary rural exception sites without first homes are allowed in AONBs.	The reference to AONBs only relates to entry level and First Home exception sites, this has been clarified in paragraph 6.3.	6.3 - Text added to clarify that it is entry level and First Home exception sites that national policy states shouldn't come forward in AONBs.
Ipswich and East Suffolk Clinical Commissioning Group	90	Consideration should be given to developing exception sites for health key workers and to supporting the CCG in negotiations with developers.	The current policies of the Local Plan provide opportunities for the development of exceptions sites to meet local needs for affordable housing, and national policy provides opportunities for entry level or First Homes exception sites, however there is no policy basis for prioritising exception sites for health key workers. The Council is however engaged in discussions with the CCG regarding the assessment of housing need for health key workers.	No changes needed.
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	83	6.3 and 6.9 - Entry Level and First Home Exception Sites should reflect district rather than local needs. As currently drafted it would be unlikely to deliver these sites. Table 6.1 is very prescriptive and cumbersome for RP's who would be	6.3 and 6.9 - it is acknowledged that as drafted the references to entry level and First Homes exception site appear inconsistent with the PPG and NPPF and therefore additional text has been included to clarify this.	6.9 - Text has been added to refer to the NPPF and the Ministerial Statement that was published alongside the PPG on First Homes in relation to considering need. Table 6.1 - changes have been made to paragraph 6.25 and the

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
		bringing such schemes forward. It is unlikely to become a major source of delivery. Other processes such as a land or opportunity led may be equally valid especially for First Home Exception Sites.	Table 6.1 should be viewed as indicative as it is acknowledged that other approaches, along similar principles, may apply albeit that Table 6.1 is aimed primarily at community groups. This has been clarified in paragraph 6.25.	title of Table 6.1 to clarify that the process set out is indicative and is aimed at community led housing groups.
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	39	<p>6.3 and 6.9 - Entry Level and First Home Exception Sites should reflect district rather than local needs. As currently drafted it would be unlikely to deliver these sites.</p> <p>Table 6.1 is very prescriptive and cumbersome for RP's who would be bringing such schemes forward. It is unlikely to become a major source of delivery. Other processes such as a land or opportunity led may be equally valid especially for First Home Exception Sites.</p>	<p>6.3 and 6.9 - it is acknowledged that as drafted the references to entry level and First Homes exception site appear inconsistent with the PPG and NPPF and therefore additional text has been included to clarify this.</p> <p>Table 6.1 should be viewed as indicative as it is acknowledged that other approaches, along similar principles, may apply albeit that Table 6.1 is aimed primarily at community groups. This has been clarified in paragraph 6.25.</p>	<p>6.9 - Text has been added to refer to the NPPF and the Ministerial Statement that was published alongside the PPG on First Homes in relation to considering need.</p> <p>Table 6.1 - changes have been made to paragraph 6.25 and the title of Table 6.1 to clarify that the process set out is indicative and is aimed at community led housing groups.</p>
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	49.	<p>6.3 and 6.9 - Entry Level and First Home Exception Sites should reflect district rather than local needs. As currently drafted it would be unlikely to deliver these sites.</p> <p>Table 6.1 is very prescriptive and cumbersome for RP's who would be bringing such schemes forward. It is unlikely to become a major source of</p>	<p>6.3 and 6.9 - it is acknowledged that as drafted the references to entry level and First Homes exception site appear inconsistent with the PPG and NPPF and therefore additional text has been included to clarify this.</p> <p>Table 6.1 should be viewed as indicative as it is acknowledged that other approaches, along similar</p>	<p>6.9 - Text has been added to refer to the NPPF and the Ministerial Statement that was published alongside the PPG on First Homes in relation to considering need.</p> <p>Table 6.1 - changes have been made to paragraph 6.25 and the title of Table 6.1 to clarify that the process set out is indicative and is</p>

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		delivery. Other processes such as a land or opportunity led may be equally valid especially for First Home Exception Sites.	principles, may apply albeit that Table 6.1 is aimed primarily at community groups. This has been clarified in paragraph 6.25.	aimed at community led housing groups.
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	61	<p>6.3 and 6.9 - Entry Level and First Home Exception Sites should reflect district rather than local needs. As currently drafted it would be unlikely to deliver these sites.</p> <p>Table 6.1 is very prescriptive and cumbersome for RP's who would be bringing such schemes forward. It is unlikely to become a major source of delivery. Other processes such as a land or opportunity led may be equally valid especially for First Home Exception Sites.</p>	<p>6.3 and 6.9 - it is acknowledged that as drafted the references to entry level and First Homes exception site appear inconsistent with the PPG and NPPF and therefore additional text has been included to clarify this.</p> <p>Table 6.1 should be viewed as indicative as it is acknowledged that other approaches, along similar principles, may apply albeit that Table 6.1 is aimed primarily at community groups. This has been clarified in paragraph 6.25.</p>	<p>6.9 - Text has been added to refer to the NPPF and the Ministerial Statement that was published alongside the PPG on First Homes in relation to considering need.</p> <p>Table 6.1 - changes have been made to paragraph 6.25 and the title of Table 6.1 to clarify that the process set out is indicative and is aimed at community led housing groups.</p>
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	72	<p>6.3 and 6.9 - Entry Level and First Home Exception Sites should reflect district rather than local needs. As currently drafted it would be unlikely to deliver these sites.</p> <p>Table 6.1 is very prescriptive and cumbersome for RP's who would be bringing such schemes forward. It is unlikely to become a major source of delivery. Other processes such as a land or opportunity led may be equally valid especially for First Home Exception Sites.</p>	<p>6.3 and 6.9 - it is acknowledged that as drafted the references to entry level and First Homes exception site appear inconsistent with the PPG and NPPF and therefore additional text has been included to clarify this.</p> <p>Table 6.1 should be viewed as indicative as it is acknowledged that other approaches, along similar principles, may apply albeit that Table 6.1 is aimed primarily at community</p>	<p>6.9 - Text has been added to refer to the NPPF and the Ministerial Statement that was published alongside the PPG on First Homes in relation to considering need.</p> <p>Table 6.1 - changes have been made to paragraph 6.25 and the title of Table 6.1 to clarify that the process set out is indicative and is aimed at community led housing groups.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			groups. This has been clarified in paragraph 6.25.	
Pigeon Investment Management (Snowling, Rob)	29	<p>Local need should be affordable housing that meets the needs of people living within the district and those that have an association with the area or people who are eligible to bid for affordable homes to rent in accordance with the Council’s choice-based letting scheme.</p> <p>6.9 should reflect the Ministerial Statement of 24th May 2021 which sets out that local authorities should support First Homes exception sites unless the need is already being met in the local authority's area.</p> <p>In paragraph 6.23 there shouldn't be a requirement for a viability assessment to justify provision of market housing on affordable housing exception sites.</p>	<p>As exception site policy provides for affordable housing to come forward where housing would not usually be supported, it is important that it is meeting a need that would not otherwise be met. Identifying a need at district level appears contrary to paragraph 78 of the NPPF which refers to local need. It is however acknowledged that in relation to First Homes the ministerial statement refers to the local authority area and therefore appropriate amendments have been made to paragraph 6.9 of the SPD.</p> <p>6.23 - Local Plan policies SCLP5.11 and WLP8.6 both require viability assessment to inform the inclusion of market housing and the SPD is reflecting this requirement.</p>	6.9 - Text has been added to refer to the Planning Practice Guidance on First Homes and the accompanying Ministerial Statement in terms of the guidance they provide on First Home exception sites.

7. Design

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	103	<p>The SPD should not impose additional requirements that may make dwellings unacceptable to Registered Providers. Mixed-tenure apartment blocks are impractical and less attractive to Registered Providers, but tenure blind design is supported. Disagree with the specified maximum acceptable cluster size of ten affordable dwellings.</p>	<p>The SPD encourages early engagement with Registered Providers to ensure that the specifications of the dwellings to be delivered for affordable tenures are acceptable to them. SPDs do not set additional policy requirements. The SPD provides guidance to aid the correct interpretation of the Local Plan policies, highlights the wider policy context and the use of the Building for a Healthy Life guidelines to direct acceptable design approaches on major housing-led sites, and generally provides design guidance to support developers in being able to bring forward design concepts likely to be acceptable in planning terms.</p> <p>The SPD recognises the benefits of mixed-tenure apartment blocks where this is able to be accommodated, however also acknowledges the practical difficulties. Amendments have been made to paragraph 7.30 (now 7.29) to clarify this.</p> <p>The Council has set a cluster size of ten dwellings to ensure diverse and inclusive communities. Guidance relating to the limiting of affordable housing cluster sizes has been provided since 2012 in the</p>	7.30 (now 7.29) – Amendments to bullet points on mixed tenure apartments blocks

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>former Waveney area via the former Waveney District Council's Affordable Housing SPD; the existing SPD recommends clusters be between 5-10 dwellings, or up to 15 on large-scale sites. The allowance for relatively small clusters of affordable dwellings is supported by the Building for a Healthy Life guidance, which both plans endorse (through policies SCLP 11.1 Design Quality and WLP8.29 Design), that calls for affordable homes to be distributed across a development.</p> <p>The Council agrees that tenure-blind design is the correct approach to mixed-tenure housing-led developments.</p>	
Beavan, David (East Suffolk Councillor)	6	The respondent asks whether there is a case for high quality, high density housing with shared facilities, especially for single people in high value areas.	Where in accordance with the relevant Local Plan's policies on housing, the Council would in principle support proposals for community-led housing developments, such as those under the cohousing model. Cohousing developments provide the opportunity for households to share more facilities and spaces (e.g. a shared laundry room, a common house, guest accommodation, community allotments, etc.). The cohousing model is acknowledged in the SPD as being particularly relevant for	Paragraph 2.16 (now 2.17) of the Cohousing subsection has been edited to provide more explanation of Cohousing.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>single-person households whom may otherwise be vulnerable to the adverse personal impacts of social isolation, though also notes that cohousing is a highly suitable housing model for larger households and households with children, to ensure that is also made clear.</p> <p>Information on cohousing is covered in paras 2.17 to 2.19 of the SPD, and guidance on design, as per Local Plan policies SCLP11.1 Design Quality and WLP8.29 Design, is included in Chapter 7 in order to support the delivery of high-quality affordable housing.</p>	

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	84	<p>7.30 Disagree with the Council's preference for mixed-tenure apartment blocks due to concern that mixed-tenure apartment blocks would not be acceptable to Registered Providers.</p> <p>7.30 / 7.33 It is suggested that the guidance should encourage the construction of affordable dwellings to achieve the minimum sizes and standards that would be acceptable to Registered Providers, whilst remaining tenure blind. Would not support the SPD adopting the Nationally Described Space Standards for affordable homes.</p> <p>7.35 Would not support the setting of housing cluster sizes of any one tenure type to ten dwellings, and instead suggests a maximum of twenty as being more practical in design and ongoing management and maintenance terms.</p>	<p>7.30 - The SPD states in para 7.30 (now 7.29) that the Council's preference is for mixed-tenure apartment blocks where this can be accommodated, though it is understood that some Registered Providers are less willing to take on mixed-tenure apartment blocks. If this arrangement is not acceptable for potential Registered Providers, single tenure apartment blocks will be supported. Amendments have been made to para 7.29 to clarify this.</p> <p>7.30 /7.33 (now 7.29 and 7.32) - The Council does not agree that the minimum sizes acceptable to Registered Providers should be aimed for. The SPD provides guidance that instead the internal size, layout and specification (i.e. fixtures and fittings) are recommended to be discussed at an early stage with Registered Providers that may be interested in purchasing the dwellings. Similarly, the encouraged approach is to maximise the number of people housed in the dwelling whilst balancing this with the provision of adequate internal space for facilities, storage and amenity space and with tenure blind design. Affordable homes should not be delivered to an</p>	<p>7.30 (now 7.29) – Amendments to bullet points on mixed tenure apartments blocks</p> <p>7.30 (now 7.29) - Clarification added to the reference to the Nationally Described Space Standard added. Additional text also added to 7.31 (former 7.32) in relation to discussing with an RP at an early stage.</p> <p>7.35 (now 7.34) – Further explanation added in relation to clusters, as well as into para 7.51.</p>

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>inferior specification to their market tenure equivalents.</p> <p>The Local Plans have not adopted the Nationally Described Space Standard (NDSS) for new housing of any tenure type. The SPD encourages reference to the NDSS in the design and submission of plans, though does not require adherence to the NDSS.</p> <p>7.35 (now 7.34) - The Council has not set a maximum cluster size for the grouping of market tenure dwellings, only for the grouping affordable dwellings. The Council has set a cluster size of ten dwellings in order to ensure healthy, diverse communities of residents. Clarity has been added in this respect. Guidance relating to the limiting of affordable housing cluster sizes has been provided since 2012 in the former Waveney area via the former Waveney District Council's 'Affordable Housing' SPD; the existing SPD recommends clusters be between 5-10, or up to 15 on large-scale sites. The allowance for relatively small clusters of affordable dwellings is consistent with the guidance included in the Building for a Healthy Life guidance (endorsed in policies SCLP 11.1 Design Quality and</p>	

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>WLP8.29 Design) which calls for affordable homes to be distributed across a development, otherwise known as a 'pepper-potting' approach, rather than grouped together all in one location on site (except on smaller developments). This approach is intended to reduce the over-representation of affordable dwellings in any one area of the site, and to create mixed and integrated communities, and an explanation of the rationale has been added into the SPD.</p>	

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	40	<p>7.30 Disagree with the Council's preference for mixed-tenure apartment blocks due to concern that mixed-tenure apartment blocks would not be acceptable to Registered Providers.</p> <p>7.30 / 7.33 It is suggested that the guidance should encourage the construction of affordable dwellings to achieve the minimum sizes and standards that would be acceptable to Registered Providers, whilst remaining tenure blind. Would not support the SPD adopting the Nationally Described Space Standards for affordable homes.</p> <p>7.35 Would not support the setting of housing cluster sizes of any one tenure type to ten dwellings, and instead suggests a maximum of twenty as being more practical in design and ongoing management and maintenance terms.</p>	<p>7.30 - The SPD states in para 7.30 (now 7.29) that the Council's preference is for mixed-tenure apartment blocks where this can be accommodated, though it is understood that some Registered Providers are less willing to take on mixed-tenure apartment blocks. If this arrangement is not acceptable for potential Registered Providers, single tenure apartment blocks will be supported. Amendments have been made to para 7.29 to clarify this.</p> <p>7.30 /7.33 (now 7.29 and 7.32) - The Council does not agree that the minimum sizes acceptable to Registered Providers should be aimed for. The SPD provides guidance that instead the internal size, layout and specification (i.e. fixtures and fittings) are recommended to be discussed at an early stage with Registered Providers that may be interested in purchasing the dwellings. Similarly, the encouraged approach is to maximise the number of people housed in the dwelling whilst balancing this with the provision of adequate internal space for facilities, storage and amenity space and with tenure blind design. Affordable homes should not be delivered to an</p>	<p>7.30 (now 7.29) – Amendments to bullet points on mixed tenure apartments blocks</p> <p>7.30 (now 7.29) - Clarification added to the reference to the Nationally Described Space Standard added. Additional text also added to 7.31 (former 7.32) in relation to discussing with an RP at an early stage.</p> <p>7.35 (now 7.34) – Further explanation added in relation to clusters, as well as into para 7.51.</p>

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			<p>WLP8.29 Design) which calls for affordable homes to be distributed across a development, otherwise known as a 'pepper-potting' approach, rather than grouped together all in one location on site (except on smaller developments). This approach is intended to reduce the over-representation of affordable dwellings in any one area of the site, and to create mixed and integrated communities, and an explanation of the rationale has been added into the SPD.</p>	

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<p>Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>50</p>	<p>7.30 Disagree with the Council's preference for mixed-tenure apartment blocks due to concern that mixed-tenure apartment blocks would not be acceptable to Registered Providers. 7.30 / 7.33 It is suggested that the guidance should encourage the construction of affordable dwellings to achieve the minimum sizes and standards that would be acceptable to Registered Providers, whilst remaining tenure blind. Would not support the SPD adopting the Nationally Described Space Standards for affordable homes. 7.35 Would not support the setting of housing cluster sizes of any one tenure type to ten dwellings, and instead suggests a maximum of twenty as being more practical in design and ongoing management and maintenance terms.</p>	<p>7.30 - The SPD states in para 7.30 (now 7.29) that the Council's preference is for mixed-tenure apartment blocks where this can be accommodated, though it is understood that some Registered Providers are less willing to take on mixed-tenure apartment blocks. If this arrangement is not acceptable for potential Registered Providers, single tenure apartment blocks will be supported. Amendments have been made to para 7.29 to clarify this.</p> <p>7.30 /7.33 (now 7.29 and 7.32) - The Council does not agree that the minimum sizes acceptable to Registered Providers should be aimed for. The SPD provides guidance that instead the internal size, layout and specification (i.e. fixtures and fittings) are recommended to be discussed at an early stage with Registered Providers that may be interested in purchasing the dwellings. Similarly, the encouraged approach is to maximise the number of people housed in the dwelling whilst balancing this with the provision of adequate internal space for facilities, storage and amenity space and with tenure blind design. Affordable homes should not be delivered to an</p>	<p>7.30 (now 7.29) – Amendments to bullet points on mixed tenure apartments blocks</p> <p>7.30 (now 7.29) - Clarification added to the reference to the Nationally Described Space Standard added. Additional text also added to 7.31 (former 7.32) in relation to discussing with an RP at an early stage.</p> <p>7.35 (now 7.34) – Further explanation added in relation to clusters, as well as into para 7.51.</p>

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Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	62	<p>7.30 Disagree with the Council's preference for mixed-tenure apartment blocks due to concern that mixed-tenure apartment blocks would not be acceptable to Registered Providers.</p> <p>7.30 / 7.33 It is suggested that the guidance should encourage the construction of affordable dwellings to achieve the minimum sizes and standards that would be acceptable to Registered Providers, whilst remaining tenure blind. Would not support the SPD adopting the Nationally Described Space Standards for affordable homes.</p> <p>7.35 Would not support the setting of housing cluster sizes of any one tenure type to ten dwellings, and instead suggests a maximum of twenty as being more practical in design and ongoing management and maintenance terms.</p>	<p>7.30 - The SPD states in para 7.30 (now 7.29) that the Council's preference is for mixed-tenure apartment blocks where this can be accommodated, though it is understood that some Registered Providers are less willing to take on mixed-tenure apartment blocks. If this arrangement is not acceptable for potential Registered Providers, single tenure apartment blocks will be supported. Amendments have been made to para 7.29 to clarify this.</p> <p>7.30 /7.33 (now 7.29 and 7.32) - The Council does not agree that the minimum sizes acceptable to Registered Providers should be aimed for. The SPD provides guidance that instead the internal size, layout and specification (i.e. fixtures and fittings) are recommended to be discussed at an early stage with Registered Providers that may be interested in purchasing the dwellings. Similarly, the encouraged approach is to maximise the number of people housed in the dwelling whilst balancing this with the provision of adequate internal space for facilities, storage and amenity space and with tenure blind design. Affordable homes should not be delivered to an</p>	<p>7.30 (now 7.29) – Amendments to bullet points on mixed tenure apartments blocks</p> <p>7.30 (now 7.29) - Clarification added to the reference to the Nationally Described Space Standard added. Additional text also added to 7.31 (former 7.32) in relation to discussing with an RP at an early stage.</p> <p>7.35 (now 7.34) – Further explanation added in relation to clusters, as well as into para 7.51.</p>

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Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	73	<p>7.30 Disagree with the Council's preference for mixed-tenure apartment blocks due to concern that mixed-tenure apartment blocks would not be acceptable to Registered Providers.</p> <p>7.30 / 7.33 It is suggested that the guidance should encourage the construction of affordable dwellings to achieve the minimum sizes and standards that would be acceptable to Registered Providers, whilst remaining tenure blind. Would not support the SPD adopting the Nationally Described Space Standards for affordable homes.</p> <p>7.35 Would not support the setting of housing cluster sizes of any one tenure type to ten dwellings, and instead suggests a maximum of twenty as being more practical in design and ongoing management and maintenance terms.</p>	<p>7.30 - The SPD states in para 7.30 (now 7.29) that the Council's preference is for mixed-tenure apartment blocks where this can be accommodated, though it is understood that some Registered Providers are less willing to take on mixed-tenure apartment blocks. If this arrangement is not acceptable for potential Registered Providers, single tenure apartment blocks will be supported. Amendments have been made to para 7.29 to clarify this.</p> <p>7.30 /7.33 (now 7.29 and 7.32) - The Council does not agree that the minimum sizes acceptable to Registered Providers should be aimed for. The SPD provides guidance that instead the internal size, layout and specification (i.e. fixtures and fittings) are recommended to be discussed at an early stage with Registered Providers that may be interested in purchasing the dwellings. Similarly, the encouraged approach is to maximise the number of people housed in the dwelling whilst balancing this with the provision of adequate internal space for facilities, storage and amenity space and with tenure blind design. Affordable homes should not be delivered to an</p>	<p>7.30 (now 7.29) – Amendments to bullet points on mixed tenure apartments blocks</p> <p>7.30 (now 7.29) - Clarification added to the reference to the Nationally Described Space Standard added. Additional text also added to 7.31 (former 7.32) in relation to discussing with an RP at an early stage.</p> <p>7.35 (now 7.34) – Further explanation added in relation to clusters, as well as into para 7.51.</p>

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			<p>inferior specification to their market tenure equivalents.</p> <p>The Local Plans have not adopted the Nationally Described Space Standard (NDSS) for new housing of any tenure type. The SPD encourages reference to the NDSS in the design and submission of plans, though does not require adherence to the NDSS.</p> <p>7.35 (now 7.34) - The Council has not set a maximum cluster size for the grouping of market tenure dwellings, only for the grouping affordable dwellings. The Council has set a cluster size of ten dwellings in order to ensure healthy, diverse communities of residents. Clarity has been added in this respect. Guidance relating to the limiting of affordable housing cluster sizes has been provided since 2012 in the former Waveney area via the former Waveney District Council's 'Affordable Housing' SPD; the existing SPD recommends clusters be between 5-10, or up to 15 on large-scale sites. The allowance for relatively small clusters of affordable dwellings is consistent with the guidance included in the Building for a Healthy Life guidance (endorsed in policies SCLP 11.1 Design Quality and</p>	

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			<p>WLP8.29 Design) which calls for affordable homes to be distributed across a development, otherwise known as a 'pepper-potting' approach, rather than grouped together all in one location on site (except on smaller developments). This approach is intended to reduce the over-representation of affordable dwellings in any one area of the site, and to create mixed and integrated communities, and an explanation of the rationale has been added into the SPD.</p>	

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Ipswich and East Suffolk Clinical Commissioning Group	91	Would like NHS guidance on designing for healthy environments to be included in the SPD. The CCG would like to work in partnership with ESC on design methodology to improve the wider determinants of health.	Guidance on the design of healthy environments has a wider scope than the design of affordable housing, which is fundamentally to ensure designs are tenure-blind and affordable homes are not in some way inferior in quality to market homes. The provision of guidance on the design of healthy environments is being considered for delivery in a separate SPD.	No changes required.
Pigeon Investment Management (Snowling, Rob)	30	7.50 - Disagrees with the position that affordable housing clusters should not be larger than ten dwellings which is somewhat arbitrary. Flexibility should be provided. Affordable clusters that are adjacent but accessed separately should not be considered part of the same cluster.	The Council has set a cluster size of ten dwellings based on the experience and advice of officers in the Housing service area to ensure healthy, diverse communities of residents. Guidance relating to the limiting of affordable housing cluster sizes to no more than ten dwellings has been provided since 2012 in the former Waveney area via the former Waveney District Council's 'Affordable Housing' SPD; the existing SPD recommends clusters be between 5-10, or up to 15 on large-scale sites. The allowance for relatively small clusters of affordable dwellings is a compromise on the guidance included in the Building for a Healthy Life guidance (endorsed in policies SCLP 11.1 Design Quality and WLP8.29 Design) which calls for affordable homes to be evenly distributed	No changes needed.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			<p>throughout a development, otherwise known as a 'pepper-potting' approach, rather than grouped (except on smaller developments).</p> <p>Clusters must be non-contiguous to be distinct from one another; contiguous groups of affordable homes will be considered a single cluster.</p>	
Saxtead Parish Council (Kirk, Lydia)	21	The SPD could promote off-site manufactured housing to lower the carbon footprint of construction.	The Council agrees that the benefits of modern methods of construction for potentially lowering the embodied carbon of a development could be included under the sub-section on sustainable construction and affordable housing. However, this need not be covered extensively in the Affordable Housing SPD as it is (a) covered more extensively in the forthcoming Sustainable Construction SPD, and (b) is not a construction method exclusive to affordable housing, but can be used for the construction of buildings in a multitude of uses.	A new paragraph covering modern methods of construction has been added to the Design chapter (new para 7.54).
Suffolk County Council (Clow, Cameron)	25	Supports design guidance approach included in the SPD.	Support noted.	No changes required.

8. Local Housing Needs Assessments

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Beavan, David (East Suffolk Councillor)	7	Can local needs assessments take account of people who struggle to pay private rents on an average wage? Often half of household income has to be spent on rent. Even if an applicant is Band D or E, they could still be in housing need because of the high private rents they are paying.	Paragraph 8.4 explains that housing needs surveys should identify ‘needs’ rather than views or preferences, with reference to household incomes. However this point could be clearer and stronger and therefore changes have been made to this paragraph (8.4).	Changes made to paragraph 8.4 in relation to taking account of incomes in assessing affordable housing need, to strengthen and clarify this point.
Ipswich and East Suffolk Clinical Commissioning Group	92	The CCG intends to share the results of its pending needs assessment for homes for key workers which will provide further opportunity to strengthen the methodology and dataset provided through the current ESC local housing needs assessment.	The Council, through its regular dialogue with the CCG, will be pleased to receive further information and outputs of this work. The SPD itself however provides guidance on the implementation of existing policies. The PPG on First Homes sets out that authorities can prioritise key workers for First Homes. It states that the definition of a key worker should be determined locally and could be any person who works in any profession that is considered essential for the functioning of a local area. Should the Council seek to define key worker and prioritise affordable housing accordingly this would appropriately be considered on a comprehensive basis and is likely to	No changes required.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
			be most appropriately considered as part of the evidencing of future Local Plan policy.	
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	85	There is little encouragement in section 8 to facilitate the delivery of good quality much needed homes. The respective roles of Parish Councils, the districts Housing Enabling function and the Registered Providers could be laid out.	The main purpose of the SPD is to provide guidance on implementing the Council's planning policies on affordable housing, however it is considered that there could be greater explanation of the roles of different organisations in the SPD and that Chapter 1 would be the most appropriate place for this.	Additional explanation included in Ch1 on the role of different organisations.
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	41	There is little encouragement in section 8 to facilitate the delivery of good quality much needed homes. The respective roles of Parish Councils, the districts Housing Enabling function and the Registered Providers could be laid out.	The main purpose of the SPD is to provide guidance on implementing the Council's planning policies on affordable housing, however it is considered that there could be greater explanation of the roles of different organisations in the SPD and that Chapter 1 would be the most appropriate place for this.	Additional explanation included in Ch1 on the role of different organisations.
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	51	There is little encouragement in section 8 to facilitate the delivery of good quality much needed homes. The respective roles of Parish Councils, the districts Housing Enabling function and the Registered Providers could be laid out.	The main purpose of the SPD is to provide guidance on implementing the Council's planning policies on affordable housing, however it is considered that there could be greater explanation of the roles of different organisations in the SPD and that Chapter 1 would be the most appropriate place for this.	Additional explanation included in Ch1 on the role of different organisations.

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	63	There is little encouragement in section 8 to facilitate the delivery of good quality much needed homes. The respective roles of Parish Councils, the districts Housing Enabling function and the Registered Providers could be laid out.	The main purpose of the SPD is to provide guidance on implementing the Council's planning policies on affordable housing, however it is considered that there could be greater explanation of the roles of different organisations in the SPD and that Chapter 1 would be the most appropriate place for this.	Additional explanation included in Ch1 on the role of different organisations.
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	74	There is little encouragement in section 8 to facilitate the delivery of good quality much needed homes. The respective roles of Parish Councils, the districts Housing Enabling function and the Registered Providers could be laid out.	The main purpose of the SPD is to provide guidance on implementing the Council's planning policies on affordable housing, however it is considered that there could be greater explanation of the roles of different organisations in the SPD and that Chapter 1 would be the most appropriate place for this.	Additional explanation included in Ch1 on the role of different organisations.

9. Viability assessments

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Beavan, David (East Suffolk Councillor)	8	Commuted sums in lieu of affordable housing should not be affected by a developer overbidding for a plot and therefore reducing affordable housing provision.	Policy SCLP5.10 and Policy WLP8.2 set out that a reduction in affordable housing provision would only be agreed in exceptional circumstances and where demonstrated to the satisfaction of the Council through a viability assessment. The national Planning Practice Guidance on Viability states that land values should be based on existing use value plus a premium for the landowner. Allowance should be made for a sufficient contribution to fully comply with planning policies. Guidance is provided in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan and this is referred to in the SPD.	No changes needed.

11. Community Infrastructure Levy

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Saxtead Parish Council (Kirk, Lydia)	110	The Parish Council is concerned that the Community Infrastructure Levy and requirement to provide higher affordable housing percentages has become a tax burden on developers that is passed to consumers through higher prices. This affects affordability.	The costs of meeting planning policy requirements should be reflected in the value that is paid to the landowner, as per national guidance. The costs of planning policy requirements were assessed through viability assessments that were undertaken as part of the production of the Local Plans.	No changes needed.

12. Making an Application

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Pigeon Investment Management (Snowling, Rob)	31	Paragraph 12.3 should not require submission of the size and mix of affordable homes at the outline application stage due to the potential for changes to take place before Reserved Matters. The Model Heads of Terms are appropriate in requiring these matters to be submitted with the Affordable Housing Scheme.	The SPD allows for submission of percentages rather than numbers at outline stage. It is recognised that reference to “plot by plot” in paragraph 12.3 may not be applicable at outline stage so “where possible” has been added.	Paragraph 12.3 – addition of “where possible”

Appendix 1 Affordable Housing Needs by Tenure

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	86	There is no clear interpretation of Appendix 1. 26.7% 1 bed shared ownership and 55.8% 4 bed rented are unlikely to be delivered as Registered Providers experience and current demand levels would not support this.	The tables are included for ease of reference as they are copied directly from the Strategic Housing Market Assessment. It is not expected the sizes would be applied rigidly however particularly for larger schemes this should help to inform the affordable housing mix acknowledging that these will be meeting a wider than local affordable need. It is acknowledged that this could be clearer through the addition of further text in paragraph 3.3.	Further text has been added to paragraph 3.3 and 3.6 to explain the role of the Strategic Housing Market Assessment and the purpose for copying the tables into the SPD.
Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	53	There is no clear interpretation of Appendix 1. 26.7% 1 bed shared ownership and 55.8% 4 bed rented are unlikely to be delivered as Registered Providers experience and current demand levels would not support this.	The tables are included for ease of reference as they are copied directly from the Strategic Housing Market Assessment. It is not expected the sizes would be applied rigidly however particularly for larger schemes this should help to inform the affordable housing mix acknowledging that these will be meeting a wider than local affordable need. It is acknowledged that this could be clearer through the addition of further text in paragraph 3.3.	Further text has been added to paragraph 3.3 and 3.6 to explain the role of the Strategic Housing Market Assessment and the purpose for copying the tables into the SPD.
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	52	There is no clear interpretation of Appendix 1. 26.7% 1 bed shared ownership and 55.8% 4 bed rented are unlikely to be delivered as Registered Providers experience and current demand levels would not support this.	The tables are included for ease of reference as they are copied directly from the Strategic Housing Market Assessment. It is not expected the sizes would be applied rigidly however particularly for larger schemes this should help to inform the affordable housing mix acknowledging	Further text has been added to paragraph 3.3 and 3.6 to explain the role of the Strategic Housing Market Assessment and the purpose for copying the tables into the SPD.

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			that these will be meeting a wider than local affordable need. It is acknowledged that this could be clearer through the addition of further text in paragraph 3.3.	
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	64	There is no clear interpretation of Appendix 1. 26.7% 1 bed shared ownership and 55.8% 4 bed rented are unlikely to be delivered as Registered Providers experience and current demand levels would not support this.	The tables are included for ease of reference as they are copied directly from the Strategic Housing Market Assessment. It is not expected the sizes would be applied rigidly however particularly for larger schemes this should help to inform the affordable housing mix acknowledging that these will be meeting a wider than local affordable need. It is acknowledged that this could be clearer through the addition of further text in paragraph 3.3.	Further text has been added to paragraph 3.3 and 3.6 to explain the role of the Strategic Housing Market Assessment and the purpose for copying the tables into the SPD.
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	75	There is no clear interpretation of Appendix 1. 26.7% 1 bed shared ownership and 55.8% 4 bed rented are unlikely to be delivered as Registered Providers experience and current demand levels would not support this.	The tables are included for ease of reference as they are copied directly from the Strategic Housing Market Assessment. It is not expected the sizes would be applied rigidly however particularly for larger schemes this should help to inform the affordable housing mix acknowledging that these will be meeting a wider than local affordable need. It is acknowledged that this could be clearer through the addition of further text in paragraph 3.3.	Further text has been added to paragraph 3.3 and 3.6 to explain the role of the Strategic Housing Market Assessment and the purpose for copying the tables into the SPD.

Appendix 2 Section 106 Model Heads of Terms and Template Clauses

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Badger Building (E. Anglia) Ltd (Coote, Justin)	104	Discounted market sale homes – 100% staircasing not allowed. This limits mortgage product availability and affordability. Consideration to a receipt recycling mechanism should be given.	Para 17 – Discounted market sale housing is defined in the NPPF as that which is “sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.” There is therefore no provision in national policy to allow staircasing to 100%.	No changes needed.
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	87	<p>Reference made to comment on paragraph 4.11, concerning becoming overly prescriptive at outline stage.</p> <p>Template definitions - It is disappointing that the definitions go beyond and add to the wording in the NPPF and paragraph 2.2. For example, Affordable Rents include reference to Local Housing Allowance rates (or their equivalent). We would not support this, as Registered Providers could find future rent levels inappropriately controlled, (e.g. through future welfare reform). This risk on housing associations can only be mitigated by them offering lower prices, harming</p>	<p>Noted – see response to comment on 4.11.</p> <p>The definition of affordable rent reflects the NPPF definition which states “(a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);” The local housing allowance is Government policy. The definition includes “or as otherwise agreed with the Council in writing” which provides flexibility should there be any future changes e.g. through welfare reform.</p>	<p>Definition of Affordable Housing Scheme – ‘where known’ added in relation to Registered Providers.</p> <p>Model Clause 1.3 (numbering in final SPD) - amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>4.18 (new para) and local connections cascade – explanation added that the cascade will apply, as</p>

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		<p>viability. Broad Rental Market Areas cover large geographical areas, are often too imprecise and can lead to large anomalies in comparison to the definition of Affordable Rents relating to the Market Rent. There may be an argument for Local Housing Allowance rates to be referred to at the point of initial letting only.</p> <p>Template definitions "Affordable Housing Scheme" - It would be unwise to name the RP in the Affordable Housing Scheme to be submitted at the point of application, in particular at outline stage, as RP investment and pricing strategies change over time. Developers should be able to enter negotiations to select the RP offering the best price nearer to the affordable homes starting on site to not adversely affect viability.</p> <p>Para 17 - Not allowing 100% staircasing on discounted market sale homes is counterproductive to facilitating affordable housing delivery. At the current time the number of mortgage products available where staircasing isn't permitted is extremely limited and come at higher cost, reducing</p>	<p>'Affordable Housing Scheme' - The SPD and the Model Heads of Terms don't require the submission of the Affordable Housing Scheme at outline application stage. However, an amendment has been added to the definition to state 'where known' in acknowledgement that the Registered Provider may also not be certain at the point of submission of the Affordable Housing Scheme. This also aligns this text with paragraph 6 of the model Heads of Terms. Model Clause 1.3 (numbering in final SPD) has also been amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>Para 17 – Discounted market sale housing is defined in the NPPF as that which is “sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.” There is therefore no provision in national policy to allow staircasing to 100%.</p>	<p>appropriate, to affordable housing delivered through a planning obligation. Amendments also made to the local connections cascade in relation to affordable housing for sale to provide for a range of circumstances.</p>

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		<p>affordability. If staircasing is permitted mechanisms to recycle receipts into providing replacement homes can be allowed for.</p> <p>Para 6 and 7 - The triggers for contracts and delivery are far too specific and inflexible. These provisions would not work on larger developments and would adversely affect cash flow.</p> <p>We assume local lettings provisions would only apply to Rural Exception Sites.</p>	<p>Para 6 and 7 - The paragraph includes reference to evidence being provided that negotiations are in hand, should a contract not yet be entered into at the 40% trigger point. No alternative triggers have been suggested by the respondent. If there are site specific issues the Council could look at alternative thresholds on a case by case basis but considers the thresholds set out are appropriate for securing affordable housing delivery in a timely manner.</p> <p>Clarity has been added into chapter 4 (para 4.18) that the Local Connections Cascade will be applied to affordable housing delivered through a planning obligation, as appropriate. This could apply to either a Rural Exception Site or to a residential development, and will be dependent on the needs identified and the circumstances of the development. Amendments have also been made to the Local Connections Cascade in relation to dwellings for sale to account for a range of circumstances.</p>	
<p>Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>42</p>	<p>Reference made to comment on paragraph 4.11, concerning becoming overly prescriptive at outline stage.</p> <p>Template definitions - It is disappointing</p>	<p>Noted – see response to comment on 4.11.</p>	<p>Definition of Affordable Housing Scheme – ‘where known’ added in relation to Registered Providers.</p>

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		<p>that the definitions go beyond and add to the wording in the NPPF and paragraph 2.2. For example, Affordable Rents include reference to Local Housing Allowance rates (or their equivalent). We would not support this, as Registered Providers could find future rent levels inappropriately controlled, (e.g. through future welfare reform). This risk on housing associations can only be mitigated by them offering lower prices, harming viability. Broad Rental Market Areas cover large geographical areas, are often too imprecise and can lead to large anomalies in comparison to the definition of Affordable Rents relating to the Market Rent. There may be an argument for Local Housing Allowance rates to be referred to at the point of initial letting only.</p> <p>Template definitions "Affordable Housing Scheme" - It would be unwise to name the RP in the Affordable Housing Scheme to be submitted at the point of application, in particular at outline stage, as RP investment and pricing strategies change over time. Developers should be able to enter negotiations to select the RP offering</p>	<p>The definition of affordable rent reflects the NPPF definition which states “(a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);” The local housing allowance is Government policy. The definition includes “or as otherwise agreed with the Council in writing” which provides flexibility should there be any future changes e.g. through welfare reform.</p> <p>‘Affordable Housing Scheme’ - The SPD and the Model Heads of Terms don't require the submission of the Affordable Housing Scheme at outline application stage. However, an amendment has been added to the definition to state ‘where known’ in acknowledgement that the Registered Provider may also not be certain at the point of submission of the Affordable Housing Scheme. This also aligns this text with paragraph 6 of the model Heads of Terms. Model Clause 1.3 (numbering in final SPD) has also been amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p>	<p>Model Clause 1.3 (numbering in final SPD) - amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>4.18 (new para) and local connections cascade – explanation added that the cascade will apply, as appropriate, to affordable housing delivered through a planning obligation. Amendments also made to the local connections cascade in relation to affordable housing for sale to provide for a range of circumstances.</p>

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		<p>the best price nearer to the affordable homes starting on site to not adversely affect viability.</p> <p>Para 17 - Not allowing 100% staircasing on discounted market sale homes is counterproductive to facilitating affordable housing delivery. At the current time the number of mortgage products available where staircasing isn't permitted is extremely limited and come at higher cost, reducing affordability. If staircasing is permitted mechanisms to recycle receipts into providing replacement homes can be allowed for.</p> <p>Para 6 and 7 - The triggers for contracts and delivery are far too specific and inflexible. These provisions would not work on larger developments and would adversely affect cash flow.</p> <p>We assume local lettings provisions would only apply to Rural Exception Sites.</p>	<p>Para 17 – Discounted market sale housing is defined in the NPPF as that which is “sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.” There is therefore no provision in national policy to allow staircasing to 100%.</p> <p>Para 6 and 7 - The paragraph includes reference to evidence being provided that negotiations are in hand, should a contract not yet be entered into at the 40% trigger point. No alternative triggers have been suggested by the respondent. If there are site specific issues the Council could look at alternative thresholds on a case by case basis but considers the thresholds set out are appropriate for securing affordable housing delivery in a timely manner.</p> <p>Clarity has been added into chapter 4 (para 4.18) that the Local Connections Cascade will be applied to affordable housing delivered through a planning obligation, as appropriate. This could</p>	

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			<p>apply to either a Rural Exception Site or to a residential development, and will be dependent on the needs identified and the circumstances of the development. Amendments have also been made to the Local Connections Cascade in relation to dwellings for sale to account for a range of circumstances.</p>	
<p>Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>54</p>	<p>Reference made to comment on paragraph 4.11, concerning becoming overly prescriptive at outline stage.</p> <p>Template definitions - It is disappointing that the definitions go beyond and add to the wording in the NPPF and paragraph 2.2. For example, Affordable Rents include reference to Local Housing Allowance rates (or their equivalent). We would not support this, as Registered Providers could find future rent levels inappropriately controlled, (e.g. through future welfare reform). This risk on housing associations can only be mitigated by them offering lower prices, harming viability. Broad Rental Market Areas cover large geographical areas, are often too imprecise and can lead to large anomalies in comparison to the definition of Affordable Rents relating to the Market Rent. There may be an</p>	<p>Noted – see response to comment on 4.11.</p> <p>The definition of affordable rent reflects the NPPF definition which states “(a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);” The local housing allowance is Government policy. The definition includes “or as otherwise agreed with the Council in writing” which provides flexibility should there be any future changes e.g. through welfare reform.</p> <p>‘Affordable Housing Scheme’ - The SPD and the Model Heads of Terms don’t require the submission of the Affordable Housing Scheme at outline application stage. However, an amendment has been</p>	<p>Definition of Affordable Housing Scheme – ‘where known’ added in relation to Registered Providers.</p> <p>Model Clause 1.3 (numbering in final SPD) - amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>4.18 (new para) and local connections cascade – explanation added that the cascade will apply, as appropriate, to affordable housing delivered through a planning obligation. Amendments also made to the local connections cascade in relation to affordable housing for sale to</p>

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		<p>argument for Local Housing Allowance rates to be referred to at the point of initial letting only.</p> <p>Template definitions "Affordable Housing Scheme" - It would be unwise to name the RP in the Affordable Housing Scheme to be submitted at the point of application, in particular at outline stage, as RP investment and pricing strategies change over time. Developers should be able to enter negotiations to select the RP offering the best price nearer to the affordable homes starting on site to not adversely affect viability.</p> <p>Para 17 - Not allowing 100% staircasing on discounted market sale homes is counterproductive to facilitating affordable housing delivery. At the current time the number of mortgage products available where staircasing isn't permitted is extremely limited and come at higher cost, reducing affordability. If staircasing is permitted mechanisms to recycle receipts into providing replacement homes can be allowed for.</p> <p>Para 6 and 7 - The triggers for contracts</p>	<p>added to the definition to state 'where known' in acknowledgement that the Registered Provider may also not be certain at the point of submission of the Affordable Housing Scheme. This also aligns this text with paragraph 6 of the model Heads of Terms. Model Clause 1.3 (numbering in final SPD) has also been amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>Para 17 – Discounted market sale housing is defined in the NPPF as that which is “sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.” There is therefore no provision in national policy to allow staircasing to 100%.</p> <p>Para 6 and 7 - The paragraph includes reference to evidence being provided that negotiations are in hand, should a contract not yet be entered into at the 40% trigger point. No alternative triggers have been suggested by the respondent.</p>	<p>provide for a range of circumstances.</p>

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		<p>and delivery are far too specific and inflexible. These provisions would not work on larger developments and would adversely affect cash flow.</p> <p>We assume local lettings provisions would only apply to Rural Exception Sites.</p>	<p>If there are site specific issues the Council could look at alternative thresholds on a case by case basis but considers the thresholds set out are appropriate for securing affordable housing delivery in a timely manner.</p> <p>Clarity has been added into chapter 4 (para 4.18) that the Local Connections Cascade will be applied to affordable housing delivered through a planning obligation, as appropriate. This could apply to either a Rural Exception Site or to a residential development, and will be dependent on the needs identified and the circumstances of the development. Amendments have also been made to the Local Connections Cascade in relation to dwellings for sale to account for a range of circumstances.</p>	
Pigeon Investment Management (Snowling, Rob)	32	<p>Preparation of a S106 agreement: Para 3 - It is not appropriate or necessary to seek to agree the mix and size of affordable homes at the outline stage and this requirement should be deleted.</p> <p>Para 5, bullet 2 - It should be clarified that the name and registration number of Registered Providers is sought for notification purposes only.</p>	<p>Para 3 - The template definition for 'Affordable Housing Table' allows for 'unless otherwise agreed with the Council', which will provide some flexibility. At Outline stage the requirement relates to percentages rather than numbers. The Affordable Housing Scheme would not need to be submitted until Reserved Matters stage and there is provision for a differing mix to be submitted at the stage under the</p>	<p>4.11 – Additional text added to acknowledge that an application may well evolve from outline stage.</p> <p>4.27 – Text has been added to clarify that the Council will consider precise steps on a case-by-case basis.</p>

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		<p>Para 5, bullet 5 - Should be deleted or clarification provided as to the types of information the Council may require.</p> <p>Para 6 and 7 - Provision should be made for alternative triggers to be agreed with the Council to allow for appropriate design, phasing and construction management matters to be considered on a site-by-site basis. This should be provided for within the Model Heads of Terms and also included within the drafting itself through the inclusion of ‘unless otherwise agreed in writing with the Council’ so that alternative triggers may be agreed with the Council, once a S106 agreement has been signed, without the need for a Deed of Variation.</p> <p>Para 14 - This only provides for the owner and the Council to enter into negotiations, which provides a lack of certainty over how long it will take to agree an alternative. It should be accompanied by further specific steps to be taken if an alternative way forward is not agreed between the owner and the Council within a reasonable period of time. Reference</p>	<p>definition of ‘Affordable Housing Scheme’. The reason for seeking this information at Outline stage is to enable the proposals to be considered in the light of the Local Plan policies on affordable housing. Amendments have been made in para 4.11 to acknowledge that an application may well evolve from outline stage.</p> <p>Para 5, bullet 2 – This allows the Council to confirm (not approve) that the details given are for a Registered Provider. Template clause 1.3 clarifies that this is for notification purposes.</p> <p>Para 5, bullet 5 - If the appropriate information has been submitted it is less likely that any other information would be needed however the Council considers it important to retain this should there be a need for further information in any circumstances.</p> <p>Para 6 and 7 - The paragraph includes reference to evidence being provided that negotiations are in hand, should a contract not yet be entered into at the 40% trigger point. No alternative triggers have been suggested by the respondent. If there are site specific issues the Council</p>	<p>Para 14 – Text has been amended to state ‘reasonable’ endeavours, and associated changes have been made in paragraph 4.24 of the SPD and 1.7 of the Template Clauses.</p>

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		<p>made to the S106 for Land at High Road, Trimley St Martin (DC/16/1919/FUL) which enabled alternative forms of affordable housing to be provided followed by payment of a commuted sum to the Council if an RP could not be found for an alternative affordable housing tenure split.</p> <p>Para 14 - 'Best endeavours' is an unnecessarily high bar and should be replaced with 'reasonable endeavours'. Cascade provisions should be included in the event that a Registered Provider cannot be found.</p>	<p>could look at alternative thresholds on a case by case basis but considers the thresholds set out are appropriate for securing affordable housing delivery in a timely manner. A deed of variation is more appropriate, if there is going to be variation in the point at which affordable housing is provided to that agreed in the S106.</p> <p>Para 14 – The Council has reviewed this and considers that ‘reasonable endeavours’ is appropriate. Text has been added in paragraph 4.27 of the SPD to explain that the Council will consider precise steps on a case-by-case basis.</p>	
<p>Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)</p>	<p>65</p>	<p>Reference made to comment on paragraph 4.11, concerning becoming overly prescriptive at outline stage.</p> <p>Template definitions - It is disappointing that the definitions go beyond and add to the wording in the NPPF and paragraph 2.2. For example, Affordable Rents include reference to Local Housing Allowance rates (or their equivalent). We would not support this, as Registered Providers could find future rent levels inappropriately controlled, (e.g. through future welfare reform). This risk on housing</p>	<p>Noted – see response to comment on 4.11.</p> <p>The definition of affordable rent reflects the NPPF definition which states “(a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);” The local housing allowance is Government policy. The definition includes “or as otherwise agreed with the Council in writing” which provides flexibility should</p>	<p>Definition of Affordable Housing Scheme – ‘where known’ added in relation to Registered Providers.</p> <p>Model Clause 1.3 (numbering in final SPD) - amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>4.18 (new para) and local connections cascade –</p>

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		<p>associations can only be mitigated by them offering lower prices, harming viability. Broad Rental Market Areas cover large geographical areas, are often too imprecise and can lead to large anomalies in comparison to the definition of Affordable Rents relating to the Market Rent. There may be an argument for Local Housing Allowance rates to be referred to at the point of initial letting only.</p> <p>Template definitions "Affordable Housing Scheme" - It would be unwise to name the RP in the Affordable Housing Scheme to be submitted at the point of application, in particular at outline stage, as RP investment and pricing strategies change over time. Developers should be able to enter negotiations to select the RP offering the best price nearer to the affordable homes starting on site to not adversely affect viability.</p> <p>Para 17 - Not allowing 100% staircasing on discounted market sale homes is counterproductive to facilitating affordable housing delivery. At the current time the number of mortgage products available where staircasing</p>	<p>there be any future changes e.g. through welfare reform.</p> <p>'Affordable Housing Scheme' - The SPD and the Model Heads of Terms don't require the submission of the Affordable Housing Scheme at outline application stage. However, an amendment has been added to the definition to state 'where known' in acknowledgement that the Registered Provider may also not be certain at the point of submission of the Affordable Housing Scheme. This also aligns this text with paragraph 6 of the model Heads of Terms. Model Clause 1.3 (numbering in final SPD) has also been amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>Para 17 – Discounted market sale housing is defined in the NPPF as that which is “sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.” There is therefore no provision in</p>	<p>explanation added that the cascade will apply, as appropriate, to affordable housing delivered through a planning obligation. Amendments also made to the local connections cascade in relation to affordable housing for sale to provide for a range of circumstances.</p>

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		<p>isn't permitted is extremely limited and come at higher cost, reducing affordability. If staircasing is permitted mechanisms to recycle receipts into providing replacement homes can be allowed for.</p> <p>Para 6 and 7 - The triggers for contracts and delivery are far too specific and inflexible. These provisions would not work on larger developments and would adversely affect cash flow.</p> <p>We assume local lettings provisions would only apply to Rural Exception Sites.</p>	<p>national policy to allow staircasing to 100%.</p> <p>Para 6 and 7 - The paragraph includes reference to evidence being provided that negotiations are in hand, should a contract not yet be entered into at the 40% trigger point. No alternative triggers have been suggested by the respondent. If there are site specific issues the Council could look at alternative thresholds on a case by case basis but considers the thresholds set out are appropriate for securing affordable housing delivery in a timely manner.</p> <p>Clarity has been added into chapter 4 (para 4.18) that the Local Connections Cascade will be applied to affordable housing delivered through a planning obligation, as appropriate. This could apply to either a Rural Exception Site or to a residential development, and will be dependent on the needs identified and the circumstances of the development. Amendments have also been made to the Local Connections Cascade in relation to dwellings for sale to account for a range of circumstances.</p>	

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Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	76	<p>Reference made to comment on paragraph 4.11, concerning becoming overly prescriptive at outline stage.</p> <p>Template definitions - It is disappointing that the definitions go beyond and add to the wording in the NPPF and paragraph 2.2. For example, Affordable Rents include reference to Local Housing Allowance rates (or their equivalent). We would not support this, as Registered Providers could find future rent levels inappropriately controlled, (e.g. through future welfare reform). This risk on housing associations can only be mitigated by them offering lower prices, harming viability. Broad Rental Market Areas cover large geographical areas, are often too imprecise and can lead to large anomalies in comparison to the definition of Affordable Rents relating to the Market Rent. There may be an argument for Local Housing Allowance rates to be referred to at the point of initial letting only.</p> <p>Template definitions "Affordable Housing Scheme" - It would be unwise to name the RP in the Affordable Housing Scheme to be submitted at the</p>	<p>Noted – see response to comment on 4.11.</p> <p>The definition of affordable rent reflects the NPPF definition which states “(a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);” The local housing allowance is Government policy. The definition includes “or as otherwise agreed with the Council in writing” which provides flexibility should there be any future changes e.g. through welfare reform.</p> <p>‘Affordable Housing Scheme’ - The SPD and the Model Heads of Terms don't require the submission of the Affordable Housing Scheme at outline application stage. However, an amendment has been added to the definition to state ‘where known’ in acknowledgement that the Registered Provider may also not be certain at the point of submission of the Affordable Housing Scheme. This also aligns this text with paragraph 6 of the model Heads of Terms. Model Clause 1.3 (numbering in final SPD) has also been</p>	<p>Definition of Affordable Housing Scheme – ‘where known’ added in relation to Registered Providers.</p> <p>Model Clause 1.3 (numbering in final SPD) - amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>4.18 (new para) and local connections cascade – explanation added that the cascade will apply, as appropriate, to affordable housing delivered through a planning obligation. Amendments also made to the local connections cascade in relation to affordable housing for sale to provide for a range of circumstances.</p>

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		<p>point of application, in particular at outline stage, as RP investment and pricing strategies change over time. Developers should be able to enter negotiations to select the RP offering the best price nearer to the affordable homes starting on site to not adversely affect viability.</p> <p>Para 17 - Not allowing 100% staircasing on discounted market sale homes is counterproductive to facilitating affordable housing delivery. At the current time the number of mortgage products available where staircasing isn't permitted is extremely limited and come at higher cost, reducing affordability. If staircasing is permitted mechanisms to recycle receipts into providing replacement homes can be allowed for.</p> <p>Para 6 and 7 - The triggers for contracts and delivery are far too specific and inflexible. These provisions would not work on larger developments and would adversely affect cash flow.</p> <p>We assume local lettings provisions would only apply to Rural Exception Sites.</p>	<p>amended to the Council to be notified of the name and registration number of the Registered Provider by no more than 40% occupation of the market dwellings.</p> <p>Para 17 – Discounted market sale housing is defined in the NPPF as that which is “sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.” There is therefore no provision in national policy to allow staircasing to 100%.</p> <p>Para 6 and 7 - The paragraph includes reference to evidence being provided that negotiations are in hand, should a contract not yet be entered into at the 40% trigger point. No alternative triggers have been suggested by the respondent. If there are site specific issues the Council could look at alternative thresholds on a case by case basis but considers the thresholds set out are appropriate for securing affordable housing delivery in a timely manner.</p>	

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			<p>Clarity has been added into chapter 4 (para 4.18) that the Local Connections Cascade will be applied to affordable housing delivered through a planning obligation, as appropriate. This could apply to either a Rural Exception Site or to a residential development, and will be dependent on the needs identified and the circumstances of the development. Amendments have also been made to the Local Connections Cascade in relation to dwellings for sale to account for a range of circumstances.</p>	

General Comments

Name/ Organisation	Comment ID / Ref	Comment Summary	Council Response	Action
Broads Authority (Beal, Natalie)	14	<p>The SPD is welcomed and well written. There is a lack of acknowledgement that it will be of relevance to any scheme in the Broads part of ESC that triggers the need for affordable housing.</p>	<p>The Council agrees that it would be helpful to clarify the position in relation to the Broads Authority, in both Chapter 1 Introduction and in Chapter 5 Financial Contributions.</p>	<p>Changes have been made to paragraph 1.11 and through the addition of a new paragraph after paragraph 5.3.</p>
Defence Infrastructure Organisation DIO Estates (Dale, Louise)	93	<p>Service Family Accommodation is provided for service families (essential local workers) and their dependents and therefore is not available on the open market. Such properties are provided to fill a specific need and are</p>	<p>Service Family Accommodation is not recognised as affordable housing in the NPPF. However the issues set out are understood and given that this type of housing is unlikely to regularly come forward text has been added to</p>	<p>Para 2.10 – reference added to service family accommodation.</p>

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		subject to government subsidy. Service families pay a quartering charge for the properties and this falls below private sector levels. Therefore, it is considered necessary that the Affordable Housing SPD is in compliance with the NPPF by including a provision which exempts developments for SFA from the requirement to provide affordable housing. This is an approach accepted by other Local Planning Authorities across the UK. It would be a significant national issue for the MOD if East Suffolk were to depart from that approach.	paragraph 2.10 to explain that affordable housing provision on such developments would be considered on a case by case basis.	
Felixstowe Town Council (Tadjrishi, Ash)	20	Members of the Town Council welcome the document which clearly outlines the different affordable housing options available.	Support welcomed	No changes needed.
Herries, Rupert	10	Concern raised over the validity of consultations due to the process related to the proposal for 70 dwellings on Chapel Field in Grundisburgh.	The respondent will have received the consultation email due to being registered on the planning policy mailing list. The comments raised are noted but are not related to the Affordable Housing SPD.	No changes needed.
Historic England (Marsh, Andrew)	96	Welcome the production of the SPD but do not currently have capacity to provide detailed comments.	Comment noted.	No changes needed.
Ministry of Defence - Defence	94	The MOD would wish to be consulted on any potential development within the Aerodrome Height safeguarding	This response is noted however the comment would be applicable to all development not just affordable housing	No changes needed.

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Infrastructure Organisation (Waldron, Chris)		zones surrounding Wattisham Airfield which consists of structures or buildings exceeding 91.4M Above Ground Level or any development within the statutory safeguarding zones that surround the East 2 WAM Network.	and therefore it is not considered necessary to reference this specifically in the Affordable Housing SPD. The Wattisham zones appear to be outside of East Suffolk, from the map supplied, however are noted.	
Natural England	11	<p>The Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p> <p>SPDs only require Strategic Environmental Assessment in exceptional circumstances. SPDs should be considered under the Habitats Regulations. If the SPD requires SEA or Habitats Regulations Assessment consultation is required.</p>	<p>Comment noted.</p> <p>Strategic Environmental Assessment and Habitats Regulations Assessment screening has been undertaken and it has been concluded that further assessment is not required. Natural England were consulted on, and agreed with, this conclusion.</p>	No changes needed.
Hopkins Homes Ltd (Pathfinder Development Consultants) (Aust, Martin)	77	The purpose of the SPD should be to facilitate the delivery of affordable housing (as noted at paragraph 1.10 of the draft), rather than introduce additional controls that in practice may hinder the delivery of new homes. We have therefore sought within our comments to highlight where there is the potential to frustrate the delivery process and have made suggestions to facilitate delivery.	As set out in paragraph 1.1 of the SPD, the purpose of the SPD is to facilitate the delivery of affordable housing and the Council has therefore carefully considered all comments made and amended the SPD where this will assist with affordable housing provision in accordance with the Council's Local Plan policies.	No changes needed (see comments on specific parts of the SPD).

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Oldman Homes (Pathfinder Development Consultants) (Aust, Martin)	33	The purpose of the SPD should be to facilitate the delivery of affordable housing (as noted at paragraph 1.10 of the draft), rather than introduce additional controls that in practice may hinder the delivery of new homes. We have therefore sought within our comments to highlight where there is the potential to frustrate the delivery process and have made suggestions to facilitate delivery.	As set out in paragraph 1.1 of the SPD, the purpose of the SPD is to facilitate the delivery of affordable housing and the Council has therefore carefully considered all comments made and amended the SPD where this will assist with affordable housing provision in accordance with the Council's Local Plan policies.	No changes needed (see comments on specific parts of the SPD).
Park Properties Anglia Ltd (Pathfinder Development Consultants) (Aust, Martin)	43	The purpose of the SPD should be to facilitate the delivery of affordable housing (as noted at paragraph 1.10 of the draft), rather than introduce additional controls that in practice may hinder the delivery of new homes. We have therefore sought within our comments to highlight where there is the potential to frustrate the delivery process and have made suggestions to facilitate delivery.	As set out in paragraph 1.1 of the SPD, the purpose of the SPD is to facilitate the delivery of affordable housing and the Council has therefore carefully considered all comments made and amended the SPD where this will assist with affordable housing provision in accordance with the Council's Local Plan policies.	No changes needed (see comments on specific parts of the SPD).
Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	55	The purpose of the SPD should be to facilitate the delivery of affordable housing (as noted at paragraph 1.10 of the draft), rather than introduce additional controls that in practice may hinder the delivery of new homes. We have therefore sought within our comments to highlight where there is the potential to frustrate the delivery	As set out in paragraph 1.1 of the SPD, the purpose of the SPD is to facilitate the delivery of affordable housing and the Council has therefore carefully considered all comments made and amended the SPD where this will assist with affordable housing provision in accordance with the Council's Local Plan policies.	No changes needed (see comments on specific parts of the SPD).

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		process and have made suggestions to facilitate delivery.		
Wellington Construction (Pathfinder Development Consultants) (Aust, Martin)	66	The purpose of the SPD should be to facilitate the delivery of affordable housing (as noted at paragraph 1.10 of the draft), rather than introduce additional controls that in practice may hinder the delivery of new homes. We have therefore sought within our comments to highlight where there is the potential to frustrate the delivery process and have made suggestions to facilitate delivery.	As set out in paragraph 1.1 of the SPD, the purpose of the SPD is to facilitate the delivery of affordable housing and the Council has therefore carefully considered all comments made and amended the SPD where this will assist with affordable housing provision in accordance with the Council's Local Plan policies.	No changes needed (see comments on specific parts of the SPD).
Residential Boat Owners' Association (Wildman, Alan)	26	In local Planning Policies there is little or no specific reference to Residential Boat Moorings. An increasing number of people wish to live permanently afloat. Moorings providers are often prevented from providing residential moorings by planning departments that have little or no understanding of the benefits. Properly managed moorings are a positive addition to an area and every residential berth equates to at least one less land-built property needed. Residential Boat Owners' Association is keen to liaise with planning authorities to help identify and advise/support on residential mooring applications. A copy of our Voluntary Code of Good Practice is attached.	As part of the preparation of the Council's two Local Plans, a Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment was undertaken. This can be viewed on the Local Plan evidence base webpage at www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/ . This identified a need for 17 additional moorings in the Suffolk Coastal Local Plan area and 1 additional mooring in the Waveney Local Plan area. The Suffolk Coastal Local Plan (see www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-	No changes needed.

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			<p>Suffolk-Coastal-Local-Plan.pdf) contains a policy on Residential Jetties, Moorings and Slipways (Policy SCLP5.17) in recognition that future applications may be received.</p>	
<p>Reydon Parish Council (O'Hear, Philip)</p>	<p>17</p>	<p>Reydon Parish Council fully supports East Suffolk Council in the aims of the SPD. We believe there is an unmet, long term and continuing need for high quality affordable housing in the district.</p>	<p>Support welcomed</p>	<p>No changes needed</p>
<p>Saxtead Parish Council (Kirk, Lydia)</p>	<p>12</p>	<p>The Supplementary Planning Document does not appear to improve the opportunities for employed people on lower incomes to purchase a home that is truly affordable. In 2019-2020 197 affordable homes were delivered. The Parish Council is advised that the overall waiting list for all varieties of Affordable Housing is in the region of 4,000 applicants and the urgent waiting list is about 1,000 applicants. It seems the housing crisis will worsen as house prices escalate. Planning policies appear obstructive rather than proactive. The Parish Council asks whether more innovative thinking is required to close the gap. CIL and affordable housing provision mean that developers charge higher prices making homes less affordable.</p>	<p>The SPD acknowledges that the need for affordable housing is a significant issue. The needs for affordable housing recognised in the Local Plans were informed by the Strategic Housing Market Assessment, which considers needs over the plan period whereas the Housing Register is a snap shot of any one time. The Strategic Housing Market Assessment is available on the Council's evidence base webpages at www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/. Different tenures of affordable housing will meet different needs. In addition to planning policies the Council as housing authority has a key role in the delivery of affordable housing and has set an objective of delivering at least 50 units</p>	<p>No changes needed.</p>

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			per annum through its Housing Development Strategy. The SPD cannot revisit existing planning policy as its purpose is to add guidance to the existing policies.	
Water Management Alliance (Nobbs, Jessica)	9	For any development site within the Board's Internal Drainage District (IDD), the Board's byelaws apply. The Byelaws for the Board are available on the development pages of our website (www.wlma.org.uk/uploads/WMA_Planing_and_Byelaw_Policy.pdf).	The comments form part of a response also relating to the draft Sustainable Construction SPD. The comments raised are not directly relevant to only affordable housing development and it is considered they are best addressed through the Sustainable Construction SPD.	No changes needed.
Westerfield Parish Council (Miller, Peter)	13	Support the SPD.	Support welcomed	No changes needed.
Badger Building (E. Anglia) Ltd (Coote, Justin)	111	The SPD should aim to deliver policy requirements but be flexible enough to not frustrate or restrict housing delivery.	The SPD provides guidance on implementing the adopted Local Plan policies related to affordable housing.	No changes needed.



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