

# The Suffolk Coastal Local Plan

## Supplementary Planning Guidance

### 2



### Affordable Housing

July 2004



**EASTSUFFOLK**  
COUNCIL

On 1<sup>st</sup> April 2019, East Suffolk Council was created by parliamentary order, covering the former districts of Suffolk Coastal District Council and Waveney District Council. The Local Government (Boundary Changes) Regulations 2018 (part 7) state that any plans, schemes, statements or strategies prepared by the predecessor council should be treated as if it had been prepared and, if so required, published by the successor council. Therefore this document applies to the part of the East Suffolk Council area formerly covered by the Suffolk Coastal District until such time that it is replaced.



Following the reforms to the Planning system through the enactment of the Planning and Compulsory Purchase Act 2004 all Supplementary Planning Guidance's can only be kept for a maximum of three years. It is the District Council's intention to review each Supplementary Planning Guidance in this time and reproduce these publications as Supplementary Planning Documents which will support the policies to be found in the Local Development Framework which is to replace the existing Suffolk Coastal Local Plan First Alteration, February 2001.

Some Supplementary Planning Guidance dates back to the early 1990's and may no longer be appropriate as the site or issue may have been resolved so these documents will be phased out of the production and will not support the Local Development Framework. Those to be kept will be reviewed and republished in accordance with new guidelines for public consultation. A list of those to be kept can be found in the Suffolk Coastal Local Development Scheme December 2004.

Please be aware when reading this guidance that some of the Government organisations referred to no longer exist or do so under a different name. For example MAFF (Ministry for Agriculture, Fisheries and Food) is no longer in operation but all responsibilities and duties are now dealt with by DEFRA (Department for the Environment, Food and Rural Affairs). Another example may be the DETR (Department of Environment, Transport and Regions) whose responsibilities are now dealt with in part by the DCLG (Department of Communities & Local Government).

If you have any questions or concerns about the status of this Supplementary Planning Guidance please contact a member of the Local Plan team who will be able to assist you in the first instance.

We thank you for your patience and understanding as we feel it inappropriate to reproduce each document with the up to date Government organisations name as they change.



# **Affordable Housing**

## **Supplementary Planning Guidance**

**July 2004**

This supplements policies AP36, AP37 and AP38 of the adopted Suffolk Coastal Local Plan First Alteration 2001.

It was adopted by the District Council on July 5<sup>th</sup> 2004

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## EXECUTIVE SUMMARY

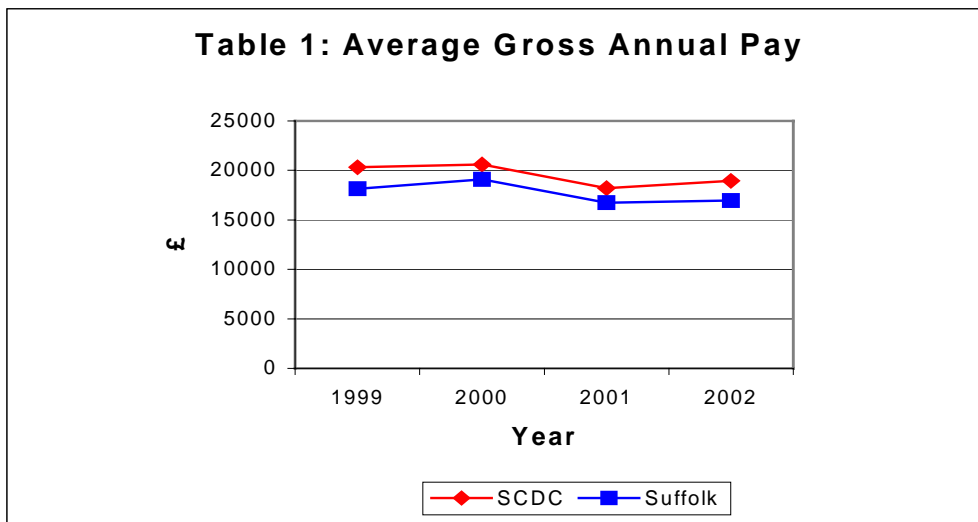
1. Many people who wish to enter the housing market within Suffolk Coastal cannot do so because their financial resources and income are below that necessary to purchase even the lowest-priced housing available, or to obtain a mortgage. The option of renting is also hampered by the lack of suitable property at an affordable price. The gap between earnings and house prices continues to widen.
2. National, regional and local planning policies encourage the provision of affordable homes.
3. The local plan consists of the Suffolk Coastal Local Plan (incorporating the First Alteration) 2001. The Suffolk Coastal Local Plan is currently being reviewed. An Issues Report has been the subject of public consultation.
4. This Supplementary Planning Guidance provides detail on the operation and mechanics of policies AP36, AP37 and AP38 as contained in the adopted Local Plan.
5. "Affordable Housing" is defined in Circular 06/98 as "both low cost market and subsidised housing (irrespective of tenure, ownership – whether exclusive or shared – or financial arrangements) that will be available to people who cannot afford to rent or buy houses generally available on the open market".
6. In December 1999 Suffolk Coastal District Council commissioned a detailed District-wide housing needs survey - an assessment and projection of housing need - as the basic building block in informing housing, planning and care strategies for the future. The report recommends the creation of low-cost market housing. It also identifies the total need for subsidised affordable housing (social housing) for the period 2000 to 2005 is predicted to be 884 units annually. Re-lets of the existing social stock average 400 units per annum and will be the major means of addressing the scale of need identified. On balance there will still be a need for 484 new units annually.
7. The report recommends that the Council should negotiate with prospective developers towards achieving a target of up to 30% social housing units from the total of all suitable sites coming forward for planning consent over the five-year period to 2005.
8. The District Council commissioned further analysis. This compares the results of the housing needs survey with size, type and tenure of the existing dwelling stock. The results show shortfalls and surpluses for various housing types across the district.
9. The survey and further analysis show that the provision of social housing has to be a priority given the predicted annual increase in need. Within social housing, the provision of rented accommodation will be important.
10. The aspiration towards home ownership is also high and this can be assisted through:
  - Shared equity social housing; or
  - Low cost market housing.
11. To seek a subsidy on low cost market housing is a possibility. However, subsidised low cost market housing is unlikely to be the Council's preference as a means of meeting identified needs.

12. Therefore, the Council considers that it would want to address housing needs primarily through:
  - low cost market housing [unsubsidised].
  - the construction of social housing for rent; and
  - the construction of social housing for shared equity.
13. The means by which (both types of) social housing can be achieved through the planning system are two-fold.
14. Firstly, the District Council could grant planning permission on land outside the physical limits boundaries of existing villages that would not normally be released for housing, in order to provide affordable housing to meet local needs in perpetuity. These are commonly known as "exception" sites and the outcome would be social housing.
15. Secondly, the District Council can require affordable housing as a part of suitable housing developments. The threshold before this policy comes into play will be developments of 25 units in settlements over 3000 and 15 units in settlements below that size. There are circumstances whereby the threshold can be reduced in settlements below 3000 in size. These are outlined. The threshold can be reduced to as low as 3 units.
16. The proportion of affordable units will be 1 in 3 and on all suitable sites this proportion shall consist of social housing only in all parts of the district.
17. The District Council also expects the inclusion of some smaller housing units (possibly including flats) within larger developments. Within towns the appropriate proportion should reflect the needs as identified in the Housing Needs Survey and further analysis. This is to achieve low cost market housing and is in addition to a proportion of social housing.
18. Appendix 3 contains a summary of how the Supplementary Planning Guidance will be applied to all parishes in the district.
19. Appendix 4 is a summary of the consultation carried out on this SPG.



# 1. BACKGROUND TO THE PROBLEM

1.1 There has been a considerable amount of new house building in Suffolk Coastal over recent years. This has been associated with a steady increase in the population. This new housing provides accommodation to meet the needs of inward migration – that is people moving into the district from outside, as well as housing demands generated from within the existing population. This latter demand arises in part from the children of those already resident in the district as they reach household-formation age, and in part to the trend towards small household size, caused by such factors as the high rate of divorce and longer-life expectation.

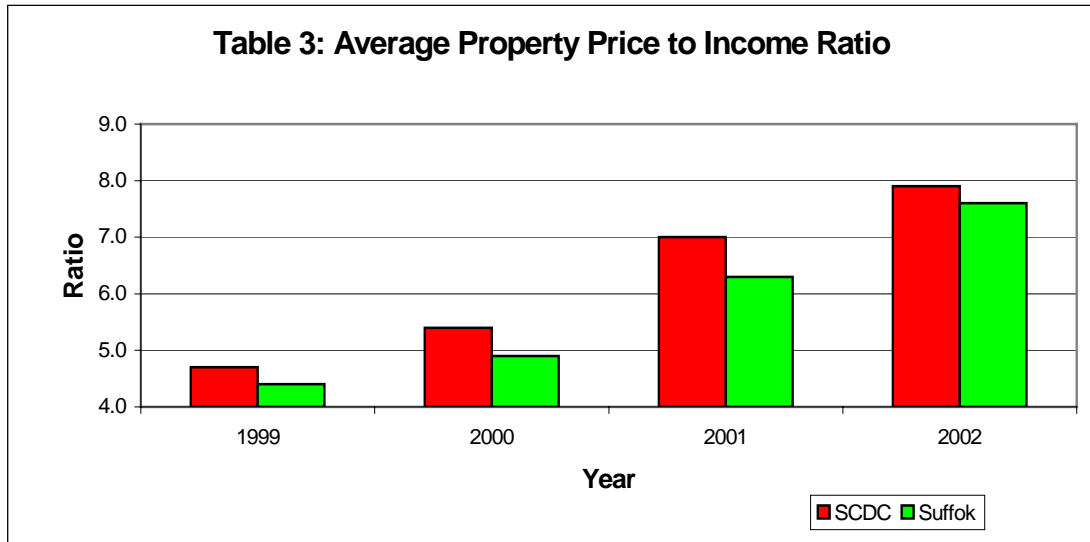


1.2 The majority of those wishing to access the housing market have sufficient resources and income to do so. Those with greater financial resources are able to purchase higher priced houses, whilst those with lower incomes may only be able to buy cheaper accommodation. There remain many people, however, who wish to enter the housing market within Suffolk Coastal but cannot do so because their financial resources and income-expectations are below that necessary to purchase even lowest-priced housing available, or to obtain a mortgage. Table 1 shows the gradual decline in average earnings in the last four years. The option of renting is also



hampered by the lack of suitable property at an affordable price.

- 1.3 This situation has not been eased in any way by the reputation of the district as a desirable place to live. It has an environment of national renown yet is only an hour's journey from the capital. It is also an attractive area for second homes, particularly in the coastal towns and villages. The prices of both new and existing houses continue to go up (see Table 2).



- 1.4 Table 3 is a combination of Tables 1 and 2. It shows the ratio between average earnings and average house price over the last four years. An increase is clearly evident. The gap between earnings and house prices continues to widen.
- 1.5 The consequence of this is that there is a number of existing or projected households who are below the financial threshold necessary to reach the lowest level of the housing market. These are frequently those who have grown up in the towns and villages in the district and wish to remain in the same area. If they cannot find housing in their home settlements at prices or rents that they can afford, they are forced to either move away to areas where cheaper housing is available or to remain in their home areas as 'concealed' households, often living with relatives.
- 1.6 This situation leads to a number of social problems:
- (a) an imbalance in the age structure, particularly in villages, which will become predominantly occupied by elderly persons or those in the more affluent income groups;
  - (b) the acceleration in the decline of local facilities such as village shops;
  - (c) over-crowding, as young families are forced to share houses with parents;
  - (d) an increase in the number of homeless households;
  - (e) pressures on the existing stock of social accommodation;
  - (f) people, mostly young, not being able to set up their own households;

- (g) "trapped households" as they find it difficult to move up the housing ladder; and
- (h) a lack of less well paid skills being provided locally because people will not be able to move into the area to take up jobs because of the high price for houses.

## **2. POLICY FRAMEWORK**

### **National Policy**

2.1 Government policy on the provision of affordable housing is set out in Planning Policy Guidance Note 3 (PPG3) on Housing (2000), with more detailed advice in circular 6/98, Planning and Affordable Housing.

2.2 The principles in PPG3 on the subject are that:

- (a) A community's need for a mix of housing types, including affordable housing, is a material planning consideration which should be taken into account in formulating development plan policies;
- (b) Where there is a demonstrable lack of affordable housing to meet local needs, local plans should include a policy for seeking affordable housing in suitable housing developments;
- (c) Rural affordable housing provision may be augmented by an 'exception' policy; and
- (d) Local planning authorities should avoid housing developments that do not make more efficient use of land [between 30 and 50 dwellings per hectare net] and contain a range of house type and size.

2.3 In addition to the above, circular 6/98 stipulates, amongst other things, that:

- (a) The term affordable housing encompasses both affordable market and subsidised housing that will be available to people who cannot afford to rent or buy houses generally available on the open market; and
- (b) It will be inappropriate to seek affordable housing on some sites depending upon such factors as site size, suitability, economics of provision, proximity to local services, and access to public transport

### **Regional Policy**

2.4 The regional planning policy framework consists of the Regional Planning Guidance for East Anglia (RPG6) 2000. This states within policy 10 that development plans should:

- (a) Make provision for a range of dwelling types and sizes to meet the assessed needs of all sections of the community, including the elderly and disabled;
- (b) Ensure that affordable housing is provided where it is needed in both rural and urban areas and located, wherever possible, where there are good public transport services to employment and services;
- (c) Include policies for securing an adequate supply of affordable housing based on local housing strategies, which in turn should be based on robust local assessments of need; and

- (d) In rural areas set appropriate thresholds for settlements with a population of 3000 or less
- 2.5 The regional planning policy framework is being revised, to be incorporated into Regional Planning Guidance 14 (RPG14) to cover the wider East of England. RPG14 has been prepared in draft form by the East of England Regional Assembly with the expectation that a document will be submitted to the Deputy Prime Minister's office in September 2004. Public consultation will then follow.
- 2.6 Policies SS13 and H2 of draft RPG14 provide for an annual average rate of house building of 23,900 units in the East of England over the period 2001-2021, a total of 478,000 dwellings. Of this, affordable housing will be provided at an annual average rate of at least 7,200, or 30%.

### **Structure Plan**

- 2.7 The Suffolk County Structure Plan 2001 contains the following policy CS9:

*Where a local need for affordable housing is identified to the satisfaction of the local planning authority, the authority will:*

- (a) *on local plan housing allocations and in determining development proposals, seek an appropriate proportion of affordable housing;*
- (b) *give favourable consideration to affordable housing on appropriate small sites adjoining villages which will not be allocated for general market housing; and require prior agreements ensuring continued availability of such housing to meet the needs of those requiring affordable housing.*

*With the exception of village development under clause b) above, provision for affordable housing will form part of the overall provision for housing specified in policy CS8*

### **Suffolk Coastal Local Plan**

- 2.8 The local plan consists of the Suffolk Coastal Local Plan (incorporating the First Alteration) 2001. There are 3 policies of specific relevance to the subject of affordable housing: AP36, AP37, and AP38. These are contained in Appendix 1. Other policies of relevance are also contained there.
- 2.9 The Suffolk Coastal Local Plan is currently being reviewed. An Issues Report has been the subject of public consultation. A replacement Plan is being prepared. This will become a Local Development Document (LDD), forming part of a Local Development Framework in a new system of local policy planning.
- 2.10 Because of the urgent need for an up-to-date policy which is consistent with the aims of PPG3 and seeks to achieve the identified housing needs of this district, the two policies relating to affordable housing (AP37 and AP38) have been revised in advance of the remainder of the Plan. These revisions have been the subject of public consultation and have been placed on deposit as the Second Alteration to the Local Plan pending incorporation in the Local Development Document.
- 2.11 This Supplementary Planning Guidance provides detail on the operation and mechanics of the policies **as contained in the adopted Local Plan** only.

### 3. STATUS OF THE DOCUMENT

- 3.1 This document derives from and is consistent with the Suffolk Coastal Local Plan (incorporating the First Alteration). These policies in the Local Plan have been the subject of rigorous examination at a public inquiry in front of an independent inspector, appointed by the Secretary of State. At the time of the local plan inquiry, the results of the council's survey of housing needs were not available. The inspector, therefore, recommended that policy AP38 should not include a figure for the percentage of affordable housing units that the District Council may require to be provided on large-scale developments. He considered that this figure should be set out in supporting supplementary planning guidance. This document represents that **supplementary planning guidance** and contains that figure, formulated on the basis of the results of the survey. It also contains other advice and guidance as to how the Council expects the policies to be implemented.
- 3.2 It has been prepared in accordance with PPG12 Development Plans. Extensive consultation has taken place (see Appendix 4). Therefore, it is expected that the Planning Inspectorate and Office of the Deputy Prime Minister will give substantial weight to it when making decisions on matters relating to affordable housing.
- 3.3 In summary:
- (a) The document is consistent with national and regional planning guidance;
  - (b) The document is consistent with the local plan;
  - (c) The document has been made publicly available;
  - (d) Consultation has taken place with the general public and other interested parties;
  - (e) The views expressed have been considered before the document was finalised and adopted;
  - (f) The adoption of the document was the subject of a council resolution;
  - (g) A statement of the consultation undertaken, the representations received and the Council's response has been published; and
  - (h) The status of the document is being made clear.
- 3.4 Because the housing market fluctuates and the basis of the document is a Housing Needs Survey which will become out of date, this Supplementary Planning Guidance will be updated on a regular basis.
- 3.5 The Guidance will also need to be reviewed following the review of the Local Plan. Indeed, elements of it may be incorporated into the replacement Local Development Document.

### 4. SUFFOLK COASTAL DISTRICT COUNCIL STRATEGIC PRIORITIES

- 4.1 The Council's emerging vision for the future of Suffolk coastal is a district where people want to live and invest, as well as care for others and the environment. To achieve this it has five strategic aims, one of which relates to housing. The others are community well-being, rural issues, the economy, and natural as well as built environment.

4.2 The strategic aim for housing is:

*To encourage the provision of, and access to, appropriate housing to meet existing and future needs*

4.3 The District Council's Housing Strategy Statement 2004/2005 provides information on housing needs and priorities. The Council historically has concentrated its funding priorities on the provision of family accommodation. It will seek to improve the provision of social housing on new developments through the planning process.

4.4 Suffolk Coastal District Council has also taken the lead in establishing a Suffolk Coastal Local Strategic Partnership (LSP). This consists of representatives of public, private and community organisations, and has the task of preparing a **Community Strategy** for the Suffolk Coastal District.

4.5 A key issue within the Strategy is the provision of housing to meet the community's needs and key policies of that Strategy include:

*HOUS1 - To increase the stock of social rented and low cost housing to meet local needs.*

*HOUS3 - To increase and maintain the stock of small housing units.*

## 5. WHAT IS AFFORDABLE HOUSING?

5.1 "Affordable Housing" is defined in Circular 06/98 as "both low cost market and subsidised housing (irrespective of tenure, ownership – whether exclusive or shared – or financial arrangements) that will be available to people who cannot afford to rent or buy houses generally available on the open market".

5.2 In December 1999 Suffolk Coastal District Council commissioned a detailed District-wide housing needs survey - an assessment and projection of housing need - as the basic building block in informing housing, planning and care strategies for the future. The District Council also commissioned further analysis of the results, comparing the Housing Needs Survey with size, type and tenure of the existing dwelling stock. The results are detailed in Appendix 3.

5.3 The need for **unsubsidised** low cost market housing was confirmed and, it was recommended, planning policies and site development briefs should continue to encourage more smaller dwellings to meet current needs. A target of 450 units overall was recommended.

5.4 Therefore, through AP36 this first form of affordable housing will consist of smaller units of accommodation provided as part of a range of house type and size. Such accommodation is more affordable as a result of being smaller, and contributes to the needs of first-time buyers in the district.

5.5 The total need for **subsidised** affordable housing for the period 2000 to 2005 is predicted to be 884 units annually. Re-lets of the existing social stock average 400 units per annum and will be the major means of addressing the scale of need identified. On balance there will still be a need for 484 new units annually.

5.6 To seek a subsidy on low cost market housing is a possibility. However, subsidised low cost market housing is not the Council's preference as a means of meeting identified needs. This is because:

- (a) Even with a subsidy the units may well be still outside the financial reach of those in housing need;
  - (b) In the case of subsidised housing, control of occupation such that the discount passes on to other subsequent purchasers is difficult;
  - (c) The subsidy can be used to better effect through the provision of social housing in the form of shared equity if home ownership is the target; and
  - (d) In addition, a lot is required from developers. They would need to put forward two comparable houses, for example in terms of location, size, and fittings, and be able to demonstrate to the Council's satisfaction that one is low cost or is being sold at a significant reduction from the other.
- 5.7 The Council's preferred form of subsidised housing, which still recognises the aspiration towards home ownership, is often referred to as "**social housing**" and can be broken down into two elements:
- (a) The provision of rented accommodation. This will be important in the Suffolk Coastal District given that 75% of households expected to form within the next five years would struggle to access the local housing market; and
  - (b) Shared equity or shared ownership social housing. The aspiration towards home ownership is high and this can be assisted by shared equity which represents an opportunity to own a proportion of the housing unit and, perhaps, through "stair-casing" have the opportunity to purchase the remaining proportion. This is considered to be extremely important as it represents the chance to step on the property ladder and, eventually, achieve home ownership.
- 5.8 A social housing agency, otherwise known as a Registered Social Landlord (RSL) and usually a housing association, controls social housing. This has the advantage of ensuring that the units are available for occupation in perpetuity by those in local need.
- 5.9 The two means by which social housing can be achieved through the planning system – as exceptions to normal planning policy or as a proportion of housing development – are considered in the next sections.
- 5.10 In some parts of the country there are the additional needs of **key workers**, particularly those moving into an area and unable to access the housing market. Such workers are usually those in the public sector, such as nurses and teachers. The high price of accommodation can affect recruitment. The District Council has not been informed of the nature and quantity of such need.

## **6. EXCEPTION SITES OUTSIDE PHYSICAL LIMITS BOUNDARIES**

- 6.1 Policy AP37 of the Suffolk Coastal Local Plan enables the District Council to grant planning permission on land outside the physical limits boundaries of existing villages that would not normally be released for housing, in order to provide affordable housing to meet local needs in perpetuity.
- 6.2 Examples in the last ten years are:
- 10 units Badingham 1993
  - 6 units Sudbourne 1993

- 6 units Orford 2000
- 12 units Grundisburgh 2003
- 4 units Kettleburgh 2002

6.3 In assessing future proposals, important factors will be the suitability of the settlement for the scale of development proposed, need and the justification for development of "greenfield" land, ie land not previously developed.

#### **General Considerations**

6.4 The Council will generally grant planning permission for "exception" schemes where:

- (a) The scale of the development is consistent with the size and character of the town or village and the objective of minimising the need for travel;
- (b) The site is acceptable in terms of matters such as access, space standards and amenity issues;
- (c) An appropriate design solution has been achieved to suit the individual characteristics of each site. Buildings, gardens, roads, parking areas, walls and fences should combine to create a high quality streetscape that forms a natural extension to the settlement. Existing important landscape features must be retained and sufficient land should be included in order to accommodate new planting belts, trees and hedgerows. The location within sensitive landscapes such as Area of Outstanding Natural Beauty will be important considerations;
- (d) There is a proven local housing need for the proposed development. This means that a recent local needs housing survey must have been carried out, which confirms that there is a need for the housing in the settlement or within an identified group of surrounding settlements; and
- (e) The development is to be carried out by a registered social landlord, generally a housing association. This is to ensure that the houses are available for occupation in perpetuity by those that meet the housing needs criteria. This is the only effective way in which the District Council can ensure that initial and successive occupiers of the houses are genuinely persons in local need.

6.5 The District Council will not support proposals for speculative housing, even though they may contain an element of affordable units. Nor will the Council accept the inclusion of a small element of open market houses within a scheme of social ones. This conflicts with the Council's overall strategy for the countryside, which is to protect it from development except in exceptional circumstances. In order to meet a proven need for social housing represents those circumstances, but not for speculative housing. Such proposals will continue to be judged against the normal housing policies in the local plan.

6.6 Before granting planning permission, the District Council will need to be satisfied that the requirements of the policy and this supplementary planning guidance have been met. A developer, agency, housing association or parish council must provide full supporting evidence. This should include:

- (a) Plans showing the site and its surroundings, together with details of the number and size of units to be provided. Layouts should demonstrate how an appropriate form of development can be achieved on the site;



- (b) The onus is on the applicant to determine the need. The Council will expect to see the results of any surveys and a statement as to what form the survey took and who was party to it.
  - (c) An explanation of, and justification for the mix of house size, type and tenure. In particular, the Council will be interested in the ratio of rent and shared equity given its desire to promote home ownership.
- 6.7 Only if this information is provided and the District Council is satisfied that there are genuine and valid reasons will a development be permitted as an exception to normal planning policy.
- 6.8 A high standard of design will be important, particularly given the location of developments on the edge of settlements. The erection of units which are manufactured off-site ["prefabricated"] is a possibility, with benefits of shorter construction periods than conventional housing and, possibly, lower build costs. The Council will still expect attention to detail as well as designs which relate well to the character of the traditional building style in the area. The Council will also consider the removal of permitted development rights in order to prevent the enlargement of small units of accommodation.

### **Towns**

- 6.9 Policy AP37 does not currently apply in respect of towns, ie to Aldeburgh, Felixstowe, Framlingham, Leiston, Saxmundham, Woodbridge and those parts of the parishes of Melton, Kesgrave, Purdis Farm, and Rushmere St Andrew that are within a defined Town area. This is because at the time of preparing the Local Plan it was considered that the towns are already likely to have a range of accommodation, including some for rent. They were also considered likely to contain some lower priced housing, suitable for purchase for first time buyers.
- 6.10 However, housing need is increasing and supply, even within towns, is not meeting it sufficiently. It is expected, therefore, that if there is a proven case for the affordable housing within towns, and no means of achieving it within the defined physical limits, then exceptions will be considered on their merits and departures from policy AP37 permitted where justified.

### **Self Build**

- 6.11 This represents an opportunity for those who cannot afford to purchase a property on the open market to obtain one by building it themselves. Such schemes can foster strong community spirit if carried out as a co-operative. Creative design may also emerge as well as a personal commitment to energy conservation.
- 6.12 Because of problems in respect of controlling occupancy in perpetuity, the District Council is unlikely to accept self-build schemes as exceptions to policy. However, there may be suitable sites within settlements, subject to the general policies of the Local Plan.

## **7. AFFORDABLE HOUSING AS A PROPORTION OF A HOUSING DEVELOPMENT**

### **Thresholds**

- 7.1 PPG3, circular 6/98, and policy AP38 make it clear that the District Council can require affordable housing as a part of suitable housing developments. Site size thresholds

before this requirement comes into play are set out in the circular, although exceptionally, where there are demonstrable local constraints, local authorities may adopt lower thresholds. The threshold are repeated in the local plan, namely:

- 25 or more dwellings or residential sites of one hectare or more in settlements with a population of over 3000; or
- 15 or more dwellings or residential sites of 0.5 hectares or more in settlements with a population of 3000 or fewer.

7.2 Settlements with a population over 3000 are Felixstowe, Kesgrave, Leiston, Martlesham, Melton, Rushmere St Andrew, Trimley St Mary and Woodbridge. It should be noted that the publication of 2001 Census data later this year may add other towns to this list.

7.3 The Local Plan policy makes it clear that, in respect of settlements with a population less than 3000, the figure of 15 can be varied where "the size and circumstances of the settlement indicate a lower threshold."

7.4 Therefore, where the Housing Needs Survey and ancillary analysis identifies a need for affordable housing in the particular settlement or area, it is expected that, in any of the following circumstances, the threshold in respect of settlements below 3000 in size will be significantly below that advocated in Circular 6/98:

- (a) Within the settlement there are few opportunities where affordable housing can be achieved if the threshold remains as high as 15;
- (b) "exception" sites may not be appropriate due to the sensitive landscape setting of the settlement - within the AONB for example;
- (c) "exception" sites are simply not coming forward as landowners are not prepared to release their land;
- (d) an up-to-date parish or community plan, or local housing needs survey identifies a similar need.

7.5 Add to these the increasingly evident circumstances of settlements experiencing high (and increasing) house prices and market rents, the clear gap between the cost of property and the ability of local people to purchase it, and the fact that this gap occurs in all ranges including the cheaper end of the market, and the Council may need to act. Unless the threshold is reduced significantly there are likely to be communities where the Council will not influence the supply of affordable housing. Therefore, within settlements below a population of 3000 where such circumstances as outlined in paragraph 7.4 might occur, the threshold is to be significantly lower than 15 units.

7.6 In such communities the threshold could be as low as 3 units.

### **The Proportion of Affordable Units - Social Housing**

7.7 At the time of the Local Plan inquiry, it was not possible to include a specific figure in Policy AP38 as to how many affordable units would be expected on sites to which the policy applied. This was because the Council did not have an up to date Housing Needs Survey upon which to base a figure. The inquiry inspector recognised the problem and recommended that the policy should merely state that the District Council "will expect an appropriate proportion of affordable housing" and that a specific figure should be decided upon once the new Housing Needs Survey had been carried out.

He also recommended that once the Council had decided on an appropriate figure, that figure should be set out in Supplementary Planning Guidance.

7.8 As explained earlier, the 2000 Housing Needs Survey recommends that the District Council should negotiate with developers towards achieving a target of **30% affordable housing**. This could consist of social and subsidised low cost market housing. The draft RPG14 also contains a target of 30% affordable housing in the East of England.

7.9 In view of the results of the Housing Needs Survey and further analysis [Appendix 3], on all suitable sites coming forward for planning consent over the next five years this proportion shall consist of **social housing only** in all parts of the district and, to aid calculation, will be assessed as **1 in 3 units**. However, each site will need to be assessed individually, targets being subject to wider planning, economic priority, viability and sustainability considerations.

7.10 This will result in the following:

1-2	units	-	0 units of affordable housing
3-5	units	-	1 unit
6-8	units	-	2 units
9-11	units	-	3 units
12-14	units	-	4 units
15-17	units	-	5 units
etc			

7.11 Fractions will be rounded to the nearest whole number. Halves will be rounded down.

7.12 Analysis of planning permissions granted over the last three years has shown that, had this requirement been in place in respect of developments of three units and over, an average of 90 social units would have been achieved per annum.

7.13 The proportion of 1 in 3 social housing may not be able to be achieved in all circumstances. This may be for reasons of economic viability or the nature of the development and the area in which it is located. In such circumstances the Council **will expect the shortfall to be made up of low cost (unsubsidised) market units**. Such units may be expected in any event - as the next paragraphs describe.

#### **The Proportion of Affordable Units - Low Cost Market Housing**

7.14 Consistent with national policy and advice, the District Council expects an appropriate **range of housing** to be provided on new developments. This should include a reasonable mix and balance of house types and sizes, and consequently a range of house prices, in order to meet the needs of as wide a range of those wishing to enter the housing market in the district as possible.

7.15 The District Council expects that the inclusion of some smaller housing units (possibly including flats) within a larger development, will allow some of those in need of affordable housing to enter the housing market. It accepts, however, that the success of this strategy may be limited in that the prices of the smaller units provided within such developments may still be too high to allow for more than a few of those in housing need to purchase them.

7.16 This is consistent with the Housing Needs Survey, which recommended the achievement of unsubsidised low cost market housing across the District. A target of 450 units was set for the period to 2005.

- 7.17 In order to achieve this, a proportion of new housing developments should consist of unsubsidised low cost market housing, **in addition to social housing**, and this shall:
- (a) In terms of the proportion, this should properly reflect the analysis of shortfall described in Appendix 3;
  - (b) Only apply in the towns as identified in the Local Plan. These are Aldeburgh, Felixstowe, Framlingham, Leiston, Saxmundham, Woodbridge [with part of Melton] and the parishes on the Ipswich eastern fringe; and
  - (c) Consist of one and two bedroomed units.
- 7.18 The outcome should be low cost market housing, distributed throughout the district in sustainable locations, resulting in the achievement of the target amount.

### **Design and Layout**

- 7.19 There are three critical factors in respect of affordable housing, particularly social housing, if provided as part of a larger development:
- (a) It should not be distinguishable visually from other housing;
  - (b) It should not be grouped. Individual houses, terraces and blocks of flats should be distributed throughout the development, subject to the management considerations of any registered social landlord being taken into account; and
  - (c) It should comply with the Council's normal policies on design standards, use of materials, respect for amenity, landscaping, car parking, etc.
- 7.20 The Council will also consider the removal of permitted development rights in order to prevent the enlargement of small units of accommodation.

### **Density**

- 7.21 In order to be consistent with PPG3 the District Council will expect the efficient use of land. This, of course, is subject to such issues as the character of an area; the existing pattern of development; the retention of important trees, shrubs and hedges; and the need to provide sufficient land for additional planting.
- 7.22 In general, therefore, the District Council will carefully examine a particular density and the case made for it, having regard to PPG3 and the thresholds above which affordable housing is required.

### **Controlling Occupancy**

- 7.23 Social housing should be available to local people **in perpetuity**. Provision through a registered social landlord (RSL) is the preferred method of control of social housing as occupation will be controlled in future years. However, with rights to acquire and of staircasing into full ownership, the Council is concerned to avoid a reduction in the number of social housing units in the future.

## **Methods of Provision**

7.24 The Council considers there basically to be 4 ways in which the affordable housing can be provided:

**1) Developer builds and transfers social housing units to a Registered Social Landlord**

The social housing will need to be constructed to the standard of the RSL and the Housing Corporation. They shall have been transferred to the satisfaction of the RSL (either freehold or long-term lease) at the cost price of development (excluding land values) before an agreed percentage of the remaining units are sold or let through the open market.

**2) Developer transfers sufficient serviced land to an RSL to enable the appropriate proportion of social housing units to be constructed**

Development should not commence until the developer has entered into a contract with a RSL for the transfer of the land for no consideration (either freehold or long-term lease to the satisfaction of the RSL). The transfer will be agreed between RSL and developer, on terms which the Council is satisfied will achieve affordable housing. Such a contract should also procure the occupation of the units to the satisfaction of the District Council.

**3) Developer builds social housing on another site and transfers it to an RSL**

In this scenario, the developer does not commence development until he has:

- a) Acquired the freehold interest in a suitable site in an appropriate location agreed by the District Council;
- b) Obtained full planning permission for the social housing units on that site; and
- c) Agreed a program and timetable with the District Council

Thereafter the elements of option 1 apply.

In this option the proportion of affordable units will differ. For example, in a development of 60 units where 1 in 3 affordable housing is sought on site, the appropriate mix of market-affordable units will be 40 to 20. In other words, for every 40 market housing units there should be 20 affordable ones

If, on the other hand, a total of 60 market units is to be provided on-site, then the same ratio of 40 to 20 should be retained. This means that 30 affordable houses should be provided off-site.

**4) The developer makes a financial contribution to the District Council**

Here, the developer does not commence development until a sum has been paid to the District Council [which it will transfer to a suitable RSL] to enable the appropriate number of social housing units to be constructed elsewhere ("cash in lieu" - see below).

The variation in respect of the number of affordable units, as explained in option 3, will also apply.

- 7.25 The Council's preferred options are always going to be 1 or 2. Options 3 and 4 - provision off-site or cash-in-lieu - will be last resorts. This is primarily to avoid the creation of large areas of housing of similar characteristics, in this case social housing, rather than developments consisting of a reasonable mix and balance of house types. Option 4 is described in more detail below.

### **Cash in Lieu**

- 7.26 The preferred location for the provision of social housing will always be within the development itself. However, there may be circumstances whereby both the authority and the developer agree on an alternative scenario. This is where a financial contribution is made by the developer in order to secure the social housing on another site. Such circumstances might include economies of scale, and considerations of efficiency in respect of the management of the dwellings by a registered social landlord.
- 7.27 The District Council will administer the fund that is created and use it to enable the provision of social housing, either in the settlement in question or within a reasonable area around it. If not utilised within ten years, the sum shall be returned to the developer.
- 7.28 There are a number of methods of calculating the cash in lieu payment. A common formula is known as the 'Tower Hamlet' model. This consists of:

<p style="text-align: center;"><b>Table 4: The Tower Hamlets Model</b></p> <p style="text-align: center;">Total number of dwellings proposed <i>Multiplied by</i> Percentage of social dwellings <i>Multiplied by</i> The relevant total cost indicator (TCI) <i>Multiplied by</i> The relevant social housing grant (SHG) rate <i>Equals</i> The sum payable</p>
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- 7.29 The TCI and SHG are both published annually by the Housing Corporation. Being based on published figures, such a formula therefore, is, immediately available to developers and reduces the need for complex negotiation and evaluation.

## **8. MONITORING AND REVIEW**

- 8.1 Because of the reliance on surveys of housing need, the housing market and property prices, this supplementary planning guidance will be reviewed on a regular basis and in the light of Housing Needs Surveys.
- 8.2 The District Council, therefore, will monitor the provision of affordable housing - both social and low cost market - in respect of the projections and targets identified. If necessary, the Local Plan policy and this SPG will need review.

## **9. GLOSSARY OF TERMS**

9.1 The following terms are used throughout the SPG:

### **Brownfield Land**

This is previously-developed land which is or was occupied by a permanent structure and associated fixed surface infrastructure unless such these have blended into the landscape in the process of time. It can occur in urban or rural situations. The full definition is contained in PPG3 Annex C.

### **Circular**

The Government's statement of its policy on a particular subject.

### **Community Strategy**

This represents a long-term vision for an authority's area [in this case the Suffolk Coastal district] which is produced by a wide-ranging partnership of public, private and community organisations. This partnership, led by the District Council, is called the Local Strategic Partnership [LSP].

### **Development Control**

Planning permission is required for any development of land, or a material change in the use of land or buildings. The system whereby local planning authorities determine applications for planning permission, or enforce against failure to apply, is known as development control.

### **Greenfield Land**

This is land which was not previously developed, except for agricultural or forestry buildings. It can be located in urban areas, eg parks and allotments. It can also include previously-developed ["brownfield"] land which has blended into the landscape. The full definition is contained in PPG3 Annex C.

### **Housing Corporation**

The Housing Corporation is a Non-Departmental Public Body sponsored by the Office of the Deputy Prime Minister (ODPM). The Corporation is responsible for investing public money in housing associations.

### **Housing Needs Survey**

In November 1999 the Council, in partnership with four other Councils in Suffolk, commissioned David Couttie Associates to undertake a housing needs survey of the five districts. This was the third survey which this Council had undertaken, the previous having been done by itself.

### **Housing Register**

In 1996 the Council established a statutory housing register as required by the Housing Act 1996. The management and operation of this register was contracted out to Suffolk Heritage Housing Association who had previously operated the Housing Waiting List for the District following the transfer of the Council's housing stock to the Association in 1991. The Statutory Register differs from the Waiting List in that it has a local connection requirement.

**Housing Strategy Statement**

This sets out the priorities for the Council's housing activities over a three year period. It examines the housing needs identified in the District, the resources available to address those needs, and the objectives and policies that the Council will pursue in allocating resources.

**Interim Planning Policy**

Planning policies which have been the subject of public consultation and adopted for use in development control but have not yet been through the process of a public inquiry.

**Key Workers**

A public sector or service employee in a specific profession such as a nurse or teacher.

**Legal Agreement**

See Section 106 Agreement.

**Local Plan**

This sets out the Council's detailed policies and specific proposals for the development and use of land which will guide its day-to-day planning decisions. In the case of this District it is the Suffolk Coastal Local Plan, adopted originally in 1994 and first reviewed in 2001. The second review is underway.

**Low Cost Market Housing**

Homes for either rent or sale at a discount when compared with the open market value.

**Planning Policy Guidance Notes (PPG)**

These set out the Governments policies on different aspects of planning.

**Regional Planning Guidance (RPG)**

Provides broad guidance for the development of a region, including transport issues, which is adopted by the Government. The current document is RPG6 for East Anglia, consisting of Cambridgeshire, Norfolk and Suffolk, as adopted in 1991. A replacement is currently being prepared. This will be RPG14 and cover a wider area - the east of England - with the addition of Bedfordshire, Essex and Herfordshire.

**Registered Social Landlord (RSL)**

Housing landlords registered with the Housing Corporation. These can be housing associations, charities registered as housing associations, and provident societies.

**Section 106 Agreement**

An agreement under section 106 of the Town and Country Planning Act 1990 made between a local planning authority and a developer. Such agreements run with the land and apply to successive owners.

**Shared Equity**

This is housing that is partly purchased and partly rented, the value, or equity, being shared between the occupier and the owner, normally a RSL. It may sometimes be possible to graduate to full ownership or "staircasing."



**Social Housing**

Homes for either rent or shared equity ownership at below market values provided by local authorities and RSLs.

**Social Housing Grant (SHG)**

The grant paid by the Housing Corporation to RSLs for capital developments.

**Staircasing**

See shared equity.

**Structure Plan**

A strategic planning policy framework for a County, in this case prepared by Suffolk County Council. The current document is the Suffolk Structure Plan 2001. The Government proposes alterations to the planning system which will result in the abolition of structure plans.

**Total Cost Indicator**

A system used by the Housing Corporation to determine the normal cost of producing dwellings, broken down by size, type and location. The TICs are reviewed on an annual basis using updated property and construction costs.

# **Affordable Housing**

## **Supplementary Planning Guidance**

### **APPENDICES**

**July 2004**

Suffolk Coastal District Council  
Melton Hill  
Woodbridge  
Suffolk  
IP12 1AU

## **APPENDIX 1 - LOCAL PLAN POLICIES**

### **POLICY AP27**

#### **Development in Villages**

Residential development in the settlements defined as Villages will only be permitted within their physical limits boundary, as defined on the Proposals Map, other than for local need housing in accordance with Policy AP37 and will normally take the form of either infilling or a group of dwellings well related to their surroundings, as appropriate and indicated in other Policies of this Plan. Proposals will be considered in relation to the scale and character of the Village, the effect on the surrounding countryside, their impact on residential amenity and highway safety, and the availability of services and facilities. Development in the form of estates will not normally be permitted.

### **POLICY AP30**

#### **New Housing in the Countryside**

In the interests of agriculture, rural amenity, road safety and the economy of services, new housing will be integrated into the physical limits boundaries of the settlements, as defined on the Proposals Map. In the Countryside, outside the Towns and Villages, and including hamlets, clusters or small groups of houses, permission will not be given for new dwellings, except as provided for in Policies AP31, AP32, AP33, AP34, AP37 and AP75.

### **POLICY AP34**

#### **Replacement and Extension of Dwellings in the Countryside**

Proposals for the replacement or extension of existing dwellings in the Countryside will generally be acceptable, provided the existing property is an authorised residential unit which has not been abandoned, does not result in an increase in the number of dwelling units, does not result in or exacerbate a serious traffic hazard and involves only a modest change in the size of the original building. In assessing proposals, the District Council will have regard to:

- (i) the landscape setting of the house and its grounds;
- (ii) the relationship between the dwelling and its plot;
- (iii) the effect on residential amenity;
- (iv) in the case of extensions, the need to retain a supply of small dwellings in rural areas;
- (v) in the case of extensions, the effect on the character and appearance of the original building;
- (vi) in the case of replacements, the character and quality of the existing building and its contribution to the landscape in comparison with its replacement.

Where proposals involve more than a modest change, they will be treated as proposals for new dwellings and, therefore, will not normally be permitted.

*An "authorised residential unit" is a recognisable dwelling which has the benefit of planning permission or was built before the need for it*

## **POLICY AP36**

### **House Type and Size**

In considering applications for housing development, the District Council will seek to ensure, in conjunction with the building industry, that a wide range of type and size of houses is provided to cater for the needs of different social and economic groups and to avoid undue uniformity.

## **POLICY AP37**

### **Local Need Housing**

Exceptionally, the District Council may be prepared to permit a small residential development to meet a particular local need for housing, for those whose incomes are too low to buy in the private market, and for whom there is insufficient rented accommodation which cannot be provided in any other way, on a site which abuts the physical limits boundary of a Village, subject to the following criteria:

- (i) any proposal will be considered in relation to the scale and character of a village, the availability of services and facilities, highway safety, effect on the surrounding Countryside and residential amenity. Proposals likely to set a precedent for ribbon development on the edge of villages will be resisted;
- (ii) the local need for housing shall first have been quantified within an area to be agreed by the District Council;
- (iii) the site shall be developed by a social need housing agency and subject to a legal agreement with the District Council, which provides for permanent controls and management to ensure the retention of proposals for local need.

## **POLICY AP38**

### **Affordable Housing on Large Sites**

In considering planning applications for the development of:-

- a) 25 or more dwellings or residential sites of 1 hectare or more in settlements with a population of over 3,000; or
- b) 15 or more dwellings or residential sites of 0.5 of a hectare or more in settlements with a population of 3,000 or fewer, unless the size and circumstances of the settlement indicate a lower threshold;

whether in total or in phases, the District Council will expect an appropriate proportion of affordable housing unless its provision is not required due to:

- i) lack of identified local need in the area;
- ii) site conditions, suitability and economics of provision;
- iii) the proximity of local services and facilities and access to public transport;
- iv) whether the provision of affordable housing would prejudice the realisation of other planning objectives.

The District Council will need to be satisfied as to the adequacy of arrangements to ensure that houses are offered to local people, who can demonstrate need at a price which they can afford, and, in the case of rented accommodation, that its enjoyment is by successive, as well as initial, occupiers.

Where the District Council or the developer accept or consider that a site is not suitable to accommodate an element of affordable housing, the District Council will expect a financial or other contribution towards the provision of affordable housing on a different site within the same Local Needs area.

**POLICY AP41**  
**Housing Density**

In the provision of new housing, the District Council will take into account the characteristics of the site itself, including the presence of natural features, and those of the surrounding area, and seek to achieve a housing density consistent with a satisfactory housing environment.

**Source: The Suffolk Coastal Local Plan (Incorporating the First Alteration) February 2001**

## APPENDIX 2 - THE NEED FOR AFFORDABLE HOUSING

### Housing Needs Survey - Quantification of Need

In December 1999 Suffolk Coastal District Council commissioned David Coutie Associates to carry out a detailed District-wide assessment and projection of housing need as the basic building block in informing housing, planning and care strategies for the future. This was a co-ordinated study with four other Suffolk District Councils to enable a consistent approach to be taken to both assessment and future delivery strategies.

The key objectives of the study were to:

- assist in the further development of the Housing Strategy and Housing Investment Programme;
- form the basis of Supplementary Planning Guidance to complement and support the affordable housing policies within the Local Plan.

The latter would be achieved through, amongst other things, an assessment of the current need for new affordable housing in the District.

For the purposes of this supplementary planning guidance, the following conclusions of the survey are critical:

- (i) The total need for affordable housing for the period 2000 to 2005 is 884 units annually. This is derived from the Housing Register in 2000 (1391) plus an estimate of the formation of households in need.

Re-lets of the existing social stock average 400 units per annum and will be the major means of addressing the scale of need identified. On balance there will still be a need for 484 new units annually. These figures ignore 110 households planning to leave the area because of a lack of affordable housing by 2005.

- (ii) Over the last five years the average rate of construction in the district has been 500 units per annum. Clearly, the Council cannot aspire to achieving all of the identified housing need and must, therefore, set a more realistic target.
- (iii) Negotiations with prospective developers should seek to achieve 30% affordable homes from the total of all suitable sites coming forward for planning consent.
- (iv) These shall consist of social housing and subsidised, low cost market homes as defined earlier in paragraph 5.7.
- (v) In addition, there is a need for unsubsidised low cost market housing and planning policies and site development briefs should continue to encourage more smaller dwellings to meet current needs. A target of 450 units overall is recommended.

The consultants who carried out the survey, therefore, recommend that the Council:

- Negotiates with prospective developers towards achieving **30% social and subsidised low cost market housing units** from the total of all suitable sites coming forward for planning consent over the five-year period to 2005. Each site will need to be assessed individually, targets being subject to wider planning, economic priority and sustainability considerations;
- promotes the additional delivery of **450 unsubsidised low-cost market housing units** in the period to 2005 to meet the needs of newly formed households with income levels adequate to access the local market.

## Further Analysis

6. The District Council commissioned further analysis. This compares the results of the housing needs survey with size, type and tenure of the existing dwelling stock.
7. To aid the further analysis, the district was divided into five areas as shown on the map. These areas were:
  - Area 1– North of the district, including the four towns of Aldeburgh, Framlingham, Leiston and Saxmundham.
  - Area 2 – West Area, including Grundisburgh
  - Area 3 – Central Area (including Woodbridge and Wickham Market) and Deben Peninsula,
  - Area 4 – Ipswich Fringe,
  - Area 5 – Felixstowe Peninsula.
8. For the purposes of the analysis, the terms 'shortfall' and 'surplus' are defined as follows:
  - Shortfall – undersupply of a type and size of property (i.e. demand from the existing resident population is greater than supply)
  - Surplus – oversupply of a type and size of property (i.e. supply is greater than demand from the existing resident population)
9. The analysis also breaks housing into two groups:
  - Social Housing [see Section 5], referred to in the analysis itself as "affordable" housing; and
  - Open Market Housing, referred to in the analysis itself as "private sector" housing.

A summary of the district shortfall/surplus of housing stock in respect of social housing is contained in Table A.
10. The key data which emerges from the analysis, and which will be used to inform future planning, housing and regeneration delivery strategies is set out in the following paragraphs.
11. In respect of Supply/Demand Analysis for **Social Housing**:
  - One-bedroom units:
    - There is a general deficit in all areas except Area 1
    - In general, demand is more than double supply across the district with the most significant shortfall in Area 5 [50% of the overall shortfall] followed by Area 3
  - Two and Three-bedroom units:
    - 72% of the overall net shortfall is in respect of 2 and 3 bedroom units
    - Close on 50% of the District's overall net shortfall of all sizes arises in Area 5 with 71% of this relating to 2 and 3 bedroom units
    - Although Areas 1 and 2 have shortfalls in 3-bed accommodation, shortfalls are most significant in Areas 3, 4 and 5

#### Four-bedroom Units

- Demand, although small relative to other property sizes, exceeds supply for 4+ bed accommodation in all areas, particularly Areas 3 and 5

### 12. In respect of Supply / Demand Analysis for **Open Market Units**

#### One-bedroom Units

- 1 bedroom surplus is significant in Area 5. 93% of this surplus relates to flats.
- In Areas 3 and 4 demand for 1 bedroom stock exceeds supply. Predominantly, this shortfall relates to houses.

#### Two-bedroom Units

- All areas except 4 have surpluses of 2 bed stock. There is a surplus which is high relative to demand in Areas 3 and 5. The majority of this surplus relates to houses, with a significant proportion relating to flats. There is a large shortfall of 2-bed units in Area 4, almost wholly relating to bungalows and houses.

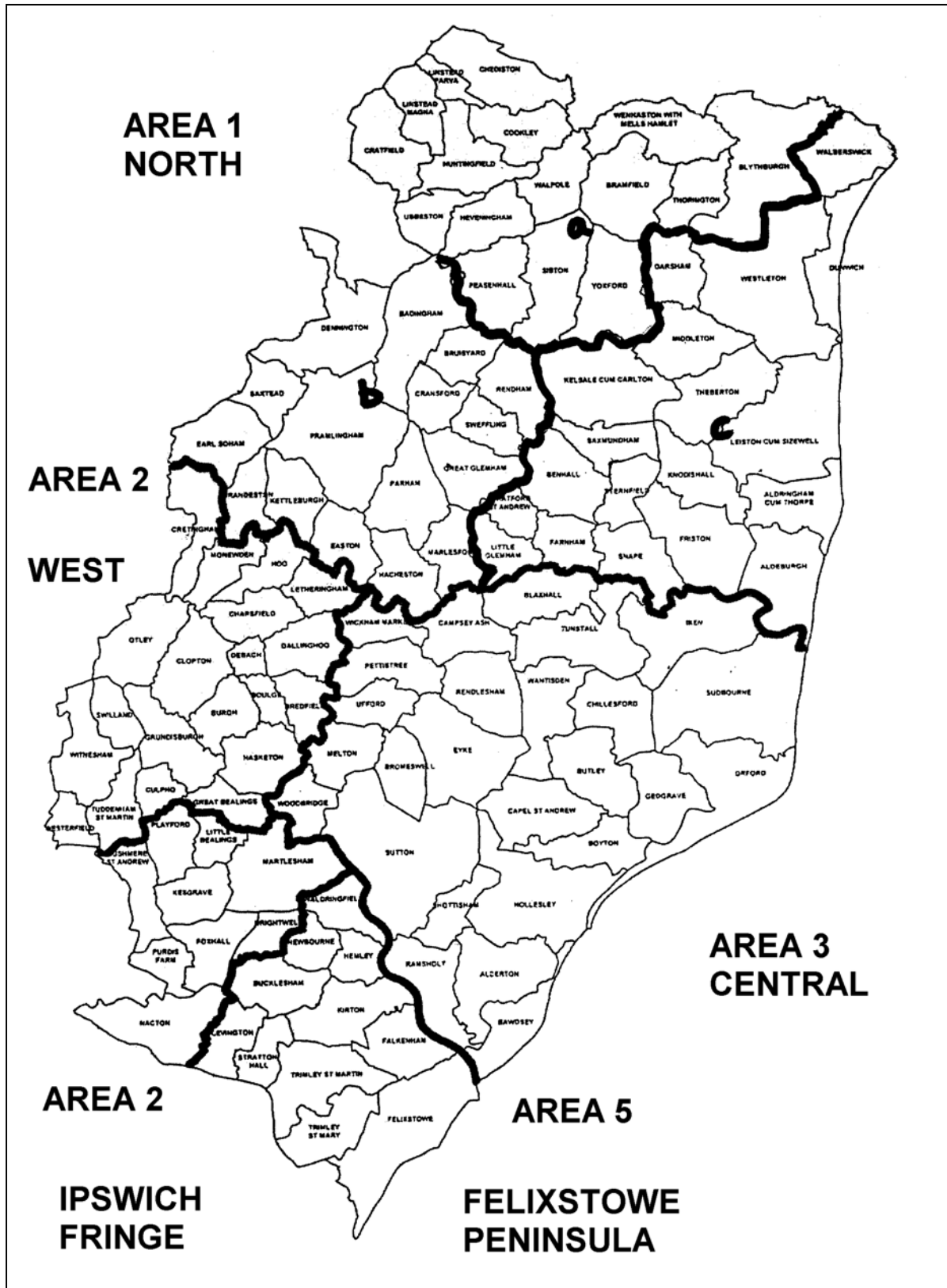
#### Three-bedroom units

- 3 bedroom surpluses exist in all areas, except 4. The most significant surpluses of 3-bed properties exist in Area 5 and Area 1. Much of these surpluses relate to 3-bed houses. There is a shortfall of 3-bed units in Area 4, mainly houses.

#### Four-bedroom Units

- All areas have a surplus of 4+ bed private stock, largely houses. This is most predominant in Area 4.
- The employment related migration factor is significant and it is believed reasonable to assume that the majority of this future in-migration will be families who will utilise the surplus of existing 3 and 4+ bedroom houses being freed up by out-migrants and moving households.





**TABLE A - SOCIAL HOUSING SURPLUSES/SHORTFALLS BY AREA (2000)**

Sub - Area	Housing Stock	Population	Type	Bedroom Size	Social Housing	
					*Shortfall	**Surplus
Area 1 North			All Types	1	1	-
				2	282	-
				3	108	-
				4	32	-
<b>Total</b>	<b>15040</b>	<b>29330</b>			<b>423</b>	<b>-</b>
Area 2 West			All Types	1	76	-
				2	75	-
				3	107	-
				4	9	-
<b>Total</b>	<b>2800</b>	<b>6810</b>			<b>267</b>	<b>-</b>
Area 3 Central			All Types	1	211	-
				2	313	-
				3	213	-
				4	60	-
<b>Total</b>	<b>10700</b>	<b>24290</b>			<b>797</b>	<b>-</b>
Area 4 Ipswich Fringe			All Types	1	151	-
				2	318	-
				3	217	-
				4	40	-
<b>Total</b>	<b>9840</b>	<b>23510</b>			<b>726</b>	<b>-</b>
Area 5 Felix. Pen.			All Types	1	437	-
				2	930	-
				3	400	-
				4	105	-
<b>Total</b>	<b>14750</b>	<b>33400</b>			<b>1872</b>	<b>-</b>
District			All Types	1	876	-
				2	1918	-
				3	1045	-
				4	246	-
<b>Overall Total</b>	<b>53130</b>	<b>117340</b>			<b>4085</b>	<b>-</b>

## APPENDIX 3 - PARISH SUMMARIES

Town/Parish	Area	Threshold	% Requirement Affordable	Accommodation Needs - Social Housing	Accommodation Needs - Open Market Housing
Leiston	1	25	1 in 3 social	First priority - 2 bedroom units Second priority - 3 bedroom units No requirement - 1 bedroom units	Housing Mix
Melton	3	25	1 in 3 social	First priority - 2 bedroom units Second priority - 1 & 3 bedroom units Minimal requirement - 4 bed. units	First priority - 2 & 3 bedroom houses and bungalows Small shortfall - 1 bedroom units
Woodbridge					
Kesgrave	4	25	1 in 3 social	First priority - 2 bedroom units Second priority - 3 bedroom units Third priority - 1 bedroom units	Major shortfall - 2 bedroom units [houses and bungalows]] Small shortfalls - 1 & 3 bed. Units [houses] No requirement - 4 bedroom units
Martlesham					
Rushmere St Andrew					
Felixstowe	5	25	1 in 3 social	Major shortfall - 2 bedroom units Second priority - 3 bedroom units Third priority - 1 bedroom units Small shortfall - 4 bedroom units	Shortfall of 2 & 3 bedroom bungalows
Trimley St Mary					
Aldeburgh	1	15 unless circumstances indicate lower	1 in 3 social	First priority - 2 bedroom units Second priority - 3 bedroom units No requirement - 1 bedroom units	Housing Mix
Aldringham-cum-Thorpe					
Badingham					
Benhall					
Blythburgh					
Bramfield					
Brandeston					
Bruisyard					
Chediston					
Cransford					
Cratfield					
Darsham					
Dennington					
Dunwich					
Earl Soham					
Easton					
Farnham					

Town/Parish	Area	Threshold	% Requirement Affordable	Accommodation Needs - Social Housing	Accommodation Needs - Open Market Housing
<b>...Continued</b>					
Framlingham					
Friston					
Great Glemham					
Hacheston					
Heveningham					
Huntingfield					
Kelsale					
Kettleburgh					
Knodishall					
Little Glemham					
Marlesford					
Middleton					
Parham					
Peasenhall					
Rendham					
Saxmundham					
Saxtead					
Snape					
Stratford St Andrew					
Sweffling					
Theberton					
Walberswick					
Walpole					
Wenhaston					
Westleton					
Yoxford					
Bredfield	2	15 unless circumstances indicate lower	1 in 3 social	First priority - 3 bedroom units Second priority - 1 & 2 bedroom units No requirement - 4 bedroom units	Small shortfall - 3 bedroom units [houses]
Charsfield					
Clopton					
Cretingham					
Great Bealings					
Grundisburgh					

Town/Parish	Area	Threshold	% Requirement Affordable	Accommodation Needs - Social Housing	Accommodation Needs - Open Market Housing
<b>...Continued</b>					
Hasketon					
Otley					
Tuddenham					
Westerfield					
Witnessham					
Alderton	3	15 unless circumstances indicate lower	1 in 3 social	First priority - 2 bedroom units Second priority - 1 & 3 bedroom units Minimal requirement - 4 bed. units	First priority - 2 & 3 bedroom houses and bungalows Small shortfall - 1 bedroom units
Bawdsey					
Blaxhall					
Boyton					
Bromeswell					
Butley					
Campsea Ashe					
Chillesford					
Eye					
Hollesley					
Melton [Village part]					
Pettistree					
Rendlesham					
Orford					
Shottisham					
Sudbourne					
Sutton					
Tunstall					
Ufford					
Wickham Market					
Little Bealings	4	15 unless circumstances indicate lower	1 in 3 social	First priority - 2 bedroom units Second priority - 3 bedroom units Third priority - 1 bedroom units Small requirement - 4 bedroom units	Major shortfall - 2 bedroom units [houses and bungalows] Small shortfalls - 1 & 3 bed. Units [houses] No requirement - 4 bedroom units
Nacton					
Playford					
Purdis Farm					

Town/Parish	Area	Threshold	% Requirement Affordable	Accommodation Needs - Social Housing	Accommodation Needs - Open Market Housing
Bucklesham	5	15 unless circumstances indicate lower	1 in 3 social	Major shortfall - 2 bedroom units Second priority - 1 & 3 bedroom units Small shortfall - 4 bedroom units	Shortfall of 2 & 3 bedroom bungalows
Falkenham					
Kirton					
Levington					
Newbourne					
Trimley St Martin					
Waldringfield					

Cookley	1	These parishes are not Villages as defined in the Local Plan and, therefore, are ineligible for the development of affordable housing.
Linstead Magna	1	
Linstead Parva	1	
Sibton	1	
Sternfield	1	
Thorington	1	
Ubbeston	1	
Boulge	2	
Burgh	2	
Culpho	2	
Dallinghoo	2	
Debach	2	
Hoo	2	
Letheringham	2	
Monewden	2	
Swilland	2	
Capel St Andrew	3	
Gedgrave	3	
Iken	3	
Ramsholt	3	
Wantisden	3	
Foxhall	4	
Brightwell,	4	
Hemley	5	
Stratton Hall	5	

## APPENDIX 4 - CONSULTATION ON DRAFT SPG

Draft supplementary planning guidance was agreed for consultation by the Council's Cabinet on the 29<sup>th</sup> July 2003 (Paper CAB 37/03). There then commenced an extensive public consultation exercise lasting until October 23<sup>rd</sup>. Copies of the document were sent, with an invitation to comment to:

- (b) all town and parish councils in the district;
- (c) numerous amenity groups, residents' associations and other local organisations with an interest in the subject;
- (d) local business groups;
- (e) the County Council and County Councillors in the district;
- (f) all housing associations operating in the district;
- (g) agents, developers and house builders considered to be prolific in the district;
- (h) the Government Office for the Eastern Region.

The documents were also the subject of a press release and an article in 'Coastline'. Both were placed on the Council's web-site.

In addition, the Cabinet sought the views of the Development Control Committee, the Policy and Development Review Committee, the Replacement Local Plan Task Group, and the Housing Provision and Availability Task Group (of which a meeting could not unfortunately be arranged).

All who were invited to comment, and those that did, are listed at the end of this Appendix. The substance of the comments received, together with the Council's response, is set out below. The views of the Council's own Committees and Task Group are also set out.

The responses were considered by Cabinet on the 2<sup>nd</sup> March and 5<sup>th</sup> July 2004. The SPG was adopted on the 5<sup>th</sup> July.

**(a) ON AFFORDABLE HOUSING GENERALLY**

<b>Ref</b>	<b>Comments Made</b>	<b>Name</b>	<b>SCDC Response</b>	<b>Proposed Action</b>
1.	The SPG should not be used to circumvent statutory planning process, particularly bearing in mind Circular 6/98 and recent ODPM advice and the fact that the Local Plan is under review.	Bellway Homes GoEast HBF Roger Bullworthy Ass.	Amend the SPG in order to ensure that this is not the case.	Amend SPG. Progress as part of a 2 <sup>nd</sup> Alteration of the Local Plan.
2.	Affordable Housing should not be given to the undeserving, lazy and irresponsible. Affordable rates would be more beneficial.	T Lomax	No comment.	None
3.	The Council should consider the allocation of land within villages for social housing, perhaps former employment areas.	Wickham Market PC	Allocation is impractical because it is likely to result in landowners holding onto land in the hope that it might have market value one day.	None.
4.	In order to retain a stock of small units of accommodation, the expansion of existing small units should be controlled, but advertised well in advance so that buyers are fully aware.	Felixstowe TC Wickham Market PC	Requires consideration as part of the review of the Local Plan in order that registered social landlords maintain the stock in order to meet needs.	Refer to the Replacement Local Plan Member Task Group
5.	Affordable units granted planning permission should be the subject of conditions preventing future expansion and change of status.	Hollesley PC Kesgrave TC	Requires consideration as part of the review of the Local Plan.	Refer to the Replacement Local Plan Member Task Group
6.	The SPG should recognise the need for small units of accommodation for the elderly wishing to move into communities in order to be near family members or indeed of supported housing schemes. Both for rent, leasehold and shared equity.	Gt Glemham PC Suffolk NHS	The SPG does refer to housing for the elderly. 'Affordable' housing is not only for first time buyers.	None.
7.	The Council should consider compulsory purchase powers in order to facilitate the required levels of affordable housing.	Smiths	Compulsory purchase should be considered only as a last resort	Noted.
8.	Given the size of the need it is unrealistic to maintain tight physical limits boundaries. The Council needs to be more proactive.	B K Crisp	Requires consideration as part of the review of the Local Plan.	<b>Refer to the Replacement Local Plan Member Task Group.</b>



**(b) ON POLICY AP37 – EXCEPTION SITES**

<b>Ref</b>	<b>Comments Made</b>	<b>Name</b>	<b>SCDC Response</b>	<b>Proposed Action</b>
9.	Extending the rural exceptions policy to towns conflicts with PPG3, Circular 6/98 and Policy CS9 of the Structure Plan. All of these link exceptions to villages. A case to extend the concept to towns has not been made sufficiently and, in any event, should be pursued through the LDD process.	SCC	It is considered that there is a case for exceptions in towns, notably Felixstowe. The point about pursuit through the development plan system is valid.	Progress as part of a 2 <sup>nd</sup> Alteration to the Local Plan.
10.	Concern over the retention of units for local people and not for sale on the open market.	Hollesley PC Theberton & Eastbrook PC	Affordable units will need to be retained as such in perpetuity with local people having priority. This is made clear in the SPG.	None.
11.	The text should be amended to acknowledge that the housing needs survey is de facto evidence of the general need for social housing.	Benhall & Sternfield PC	It is considered to do so already.	None.
12.	More thought should be given to the possibility of self-build.	Wickham Market PC	Self-build on exception sites is not considered practical because of the problems of controlling sale price and occupation.	None.
13.	Exception sites should also include the conversion of existing farm buildings in the countryside, well-related to a village. Low cost market housing may be preferable to social housing.	Gt Glemham PC	It may be possible to permit exception sites that are well related rather than abutting physical limits. However, they must not be in remote, unsustainable locations.	Consider amending the policy whereby exception sites can be well-related as well as abutting physical limits. Progress as part of a 2 <sup>nd</sup> Alteration to the Local Plan.
14.	Policy AP37 should not apply only to sites which abut a physical limits boundary but are closely related, or even in communities without a physical limits boundary.	Countryside Agency Dunwich PC	It is accepted that some villages have few opportunities for exception sites, particularly because of the sensitive nature of their edges. If other sites are to be considered they should be well-related to the core of the village and this should be defined.	
15.	The Parish Council should have access to surveys of need in order to help it formulate its views on particular proposals.	Dunwich PC	Any documents submitted in support of planning applications are usually public.	None.

Ref	Comments Made	Name	SCDC Response	Proposed Action
16.	Support for the application of the policy to Felixstowe.	Felixstowe TC	Noted.	None.

**(c) ON POLICY AP38**

Ref	Comments Made	Name	SCDC Response	Proposed Action
17.	<p>The proposals have no regard to the practicalities and financial viability (as indicated in Circular 6/98) of development. The Council is interfering in the housing market in a way that is inappropriate:</p> <p>(a) The proposal amounts to a tax on land and development without fully considering its consequences. Landowners and developers will remove land from the market place.</p> <p>(b) Sometimes a sum housing associations can afford to pay does not cover the construction costs. These un-recovered costs are also deducted from land value to maintain the developer's liability margin. If the land price is fixed the development becomes un-viable and does not take place.</p> <p>(c) The costs of affordable housing will be passed on to the private element of any scheme, contributing to a widening gap in house prices between affordable and market units.</p> <p>(d) The Council should meet the need by co-operating with developers as opposed to laying down unviable policies.</p>	<p>Blake Gorst B K Crisp Felixstowe TC GoEast HBF Roger Bullworthy Peacock Short Smiths Merchant Projects</p>	<p>The Council is not introducing a new policy. It is recognised in national policy that it is appropriate to require affordable housing as a proportion of general market housing. The SPG and policy do make reference to the economics of provision as being a valid consideration. Negotiation, co-operation and open-book accounting are expected.</p> <p>A Forum was recently arranged by the Council and consisting of housing providers (registered social landlords and house builders), planning agents and officers of the Council. The point was made that many housebuilders would have purchased land, often to create a land bank, and the introduction of a requirement for affordable housing could affect the economics of a scheme.</p>	None.
18.	The policy will encourage landowners and developers to hold back the land. Recommends a timed sliding scale of percentages - eg 15% until 2010, 20% to 2015, 25% thereafter - to encourage early release.	Chater Homes	The application of a small percentage will not meet the identified needs of the district. There is also no evidence of developers holding on to land.	None

Ref	Comments Made	Name	SCDC Response	Proposed Action
19.	Negotiations of viability and 106 Agreements will slow up the planning process.	Merchant Projects	It is hoped that model agreements can be formulated.	None.
20.	Distortions in housing provision will result as developers seek to avoid development that breaches the threshold.	B K Crisp	No comment.	None.
21.	The need for affordable units per annum is higher than the Structure Plan requirement, suggesting that 100% of all new housing units should be affordable.	Peacock Short	It is agreed that the Housing Needs Survey to an extent reflects people's aspirations. A positive approach needs to be taken to achieve the need element.	None.
22.	Highly critical of any suggestion that there is a "surplus" of property within the area.	Peacock Short	No comment.	None.
23.	The policy should not "expect" but "seek" an appropriate proportion of affordable housing, as indicated in Circular 6/98. The amount is to be the subject of negotiation.	Bellway Homes	PPG3 states that an authority should define what it considers to be "affordable" housing and seek to quantify it. Furthermore, para 17 states "where a local planning authority has decided ....that an element of affordable housing should be provided in development of a site, there is a presumption that such housing should be provided as part of the proposed development of the site. Failure to apply this policy could justify the refusal of planning permission."	None.
24.	The basis of the SPG and policy change i.e. the housing needs survey, was carried out in 1999 and is out of date.	HBF Bellway Homes	The Survey is still considered to be relevant although it should be reviewed soon.	None.
25.	Where a site is not suitable for an element of affordable housing none should be required rather than seeking cash payments, thereby contrary to Circular 6/98.	Roger Bullworthy Associates	As a rule, the Council expects to see affordable housing provided on-site to contribute to the creation of balanced communities. Developers/applicants can propose provision off-site or cash-in-lieu of provision elsewhere. The Council is prepared <b>to consider</b> , not propose, such alternatives. But only as a last resort.	Amend the SPG to stress that provision off-site or cash-in-lieu are last resorts.
26.	There are no planning reasons why a site would be unsuitable for social housing thereby justifying cash in lieu of its provision elsewhere.	GoEast	See 24 above.	See 24 above.

Ref	Comments Made	Name	SCDC Response	Proposed Action
27.	Affordable housing should be integrated into developments and not in separate locations.	GoEast	See 24 above.	See 24 above.
28.	Objection to the implication that low cost market housing will be expected in addition to social housing (para 9.13). The Council is seeking to differentiate one from the other when both are within the Government's definition of affordable housing.	Bellway Homes	The paragraph (9.20) refers to the provision of smaller homes (with no subsidy), which by inference are more affordable. This reflects government objectives of mixed housing developments.	None.
29.	The text implies that land is transferred to a RSL for no consideration. This is unreasonable provision of affordable housing which is a matter for negotiation between a developer and a RSL.	Roger Bullworthy Associates	The arrangements are a matter for negotiation.	<b>Amend paragraph 9.20(2) to indicate that the transfer of land shall be agreed between developer and RSL, and on terms which the Council is satisfied will achieve affordable housing.</b>
30.	The widespread distribution of social housing will be difficult to manage by RSLs.	B K Crisp	This is not the view of RSLs.	None
31.	Flexibility should exist to enable affordable housing of all types, making a contribution to the housing stock but not taxing the developer unduly. Low cost market housing as an alternative should apply to all areas and not just within towns.	Merchant Projects Smiths B K Crisp	The Council considers "social housing" to be in the priority in the District in terms of affordable housing.	None.
32.	In some cases the ratio of 1 in 3 should be higher. Therefore it should be expressed as a minimum requirement. One suggestion made of 50%.	Gt Glemham PC Hollesey PC Suffolk Preservation Society	The ratio reflects the recommendation within the Housing Needs Survey Report.	None.
33.	the Council for Racial Equality advocates 15%, supported by research carried out by the London School of Economics Centre for Analysis of Social Exclusion (a research paper was attached). This is to prevent the creation of large areas of social housing which are socially excluded with resulting problems.	Chater Homes	The research was based very considerably on inner cities and the problems that could arise from large scale developments. In Suffolk Coastal: <ul style="list-style-type: none"> <li>the developments arising from the policy are likely to be considerably smaller:</li> <li>social housing for rent is only one aspect of affordable housing; the</li> </ul>	

Ref	Comments Made	Name	SCDC Response	Proposed Action
			<p>policy also advocated housing for shared equity; and</p> <ul style="list-style-type: none"> <li>the Council expects the social housing to be dispersed throughout a development and not grouped together.</li> </ul>	
34.	The units created should be for local people and not be second homes.	Hollesley PC	Occupation will be controlled.	None.
35.	The text should make it more clear that all forms of affordable housing should be fully integrated into the layout and design of residential development.	Suffolk Preservation Society	Paragraphs 9.22 to 9.24 are considered to cover this point adequately.	None.
36.	Criterion (iii) of Policy AP38 should be deleted as many settlements do not have access to public transport and will be prevented from achieving affordable housing.	Dunwich PC	The criterion requires qualification.	Refer to Local Plan task group - amend Policy AP38 to qualify the phrase "access to public transport."
37.	Affordable housing can be achieved by conditions and not just legal agreement. Suggest the wording "no more than 50% of the general market dwellings shall be occupied until the affordable housing element of X dwellings has been built and transferred to a registered social landlord."	Roger Bullworthy Associates	The policy objective is affordable housing for local people in perpetuity, and not just for the first occupants. This cannot be achieved by condition but by legal agreement.	None.
38.	The reduction in the threshold to 3 units is welcomed, 15 being unrealistic in smaller communities.	Wickham Market PC	Noted.	None.
39.	Support for the threshold and proportion in one case giving examples of how family members having difficulty finding accommodation.	S Hawes Kesgrave TC Easton PC Woodbridge Society	Noted.	None.
40.	Support for the policy but too late in the day in Melton where opportunities have been missed and little land remains.	Melton PC	Noted.	None.

**(d) ON SPECIFIC SITES AND AREAS IN RESPECT OF POLICY AP37**

Ref	Comments Made	Name	SCDC Response	Proposed Action
41.	Sites suggested adjacent to Walpole physical limits boundary.	Walpole Hatch Farm	The SPG does not allocate sites. A matter for the owner/developer to submit a planning application if considered consistent with policy.	None.
42.	Objection to the policy if it justifies the development of Trimley St Martin and Trimley St Mary as proposed by Trinity College.	R West	Noted.	None.
43.	Suggestion of Valley Road, Leiston.	L J Ling	See 39 above	None.
44.	Suggestions (sites unspecified) in Leiston or Saxmundham.	St Matthew Housing	See 39 above	None.
45.	Suggests land at Iken adjacent to the village hall.	Anchor Farms	Iken is not a village with physical limits.	None
46.	Physical limits boundary of Woodbridge should be retained to prevent it merging with adjoining parishes.	Woodbridge TC	See 39 above	None.

**(e) VIEWS OF DISTRICT COUNCIL COMMITTEES AND TASK GROUP**

Committee / Task Group	Resolution	Proposed Response	Proposed Action
Policy and Development Review Committee 11 September 2003	<ol style="list-style-type: none"> <li>1. That Cabinet be advised that this Committee endorses both the content of the Supplementary Planning Guidance and the changes to Policies AP37 and AP38 and recommends their use for the purposes of development control, subject to Cabinet being requested to review the requirement for 30% affordable housing, as it relates to smaller developments.</li> <li>2. That Cabinet be requested to consider adopting a sliding scale for the percentage provision of affordable housing within residential developments so that the larger the development the larger the percentage of affordable housing is required.</li> <li>3. That Cabinet be requested to investigate if more land can be made</li> </ol>	The proportion of 30% is recommended in the Housing Needs Survey. It applies across the district and to all developments above a certain size. To vary the proportion according to the size of development may not achieve the assumed objective of creating more affordable units. The majority of planning applications are small in size. Very few applications are large (hence the proposal in the SPG to reduce the threshold to 3 units). The variation in	None.

Committee / Task Group	Resolution	Proposed Response	Proposed Action
	available for the provision of affordable housing through planning consents.	<p>proportion also discriminates against the volume builder.</p> <p>It is difficult to envisage how other land can practically be made available for affordable housing. The SPG already provides for social housing and low cost market housing as part of mixed schemes.</p>	
Development Control Committee 1 October 2003	<p>That the Committee endorses both the content of the Supplementary Planning Guidance and the changes to Policies AP37 and AP38 and recommends their use for the purposes of the development control subject to the following comments:</p> <ol style="list-style-type: none"> <li>1) that in AP37 the word “abuts” be deleted and replaced with “is well related”</li> <li>2) that the figure of 30% should be replaced by 1/3<sup>rd</sup></li> <li>3) that consideration be given to removing “permitted development rights” on properties specifically provided as affordable housing</li> <li>4) that efforts be made to ensure that room size in affordable houses remains viable.</li> </ol>	<p>See line 14 of Appendix B.</p> <p>The figure of 30% is recommended by the consultants in the Housing Needs Study and does give rise to accounting problems.</p> <p>A valid comment.</p> <p>Noted.</p>	<p>See line 14 of Appendix B.</p> <p>That 30% be replaced by 1 in 3.</p> <p>Amend the SPG to refer to the point.</p> <p>None.</p>
Replacement Local Plan Task Group	That Cabinet be informed that the Task Group endorses both the content of the Supplementary Planning Guidance and the changes to Policies AP37 and AP38 of the Local Plan and recommends their use for the purposes of development control.	Noted.	None.

## **(f) RESPONDENTS**

The following submitted comments on the draft SPG and proposed interim planning policy:

Anchor Farms	Kesgrave Town Council
Bellway Homes	L J Ling
Benhall & Sternfield Parish Council	T Lomax
Blake Gorst FRICS	Melton Parish Council
Roger Bullworthy Associates	Merchant Projects
Chater Homes	Peacock Short
Countryside Agency	Saint Matthew Housing
B K Crisp	Site Preservation Society
Dunwich Parish Council	Smiths Estate & Land Agents
Easton Parish Council	Suffolk NHS
Equal Opportunities Commission	Suffolk County Council
Felixstowe Society	Theberton & Eastbridge Parish Council
Felixstowe Town Council	Walpole Hatch Farm
GoEast	R West
Gt Glemham Parish Council	Wickham Market Parish Council
S Hawes	Woodbridge Society
Hollesley Parish Council	Woodbridge Town Council
Housebuilders Federation	

## **(g) PART 2 – NON-RESPONDENTS**

The following organisations were invited to comment on the draft SPG and proposed interim policy but did not respond:

Advisory Council for Education of Romany & Other Travellers	Hanover Housing Association
Alde & Ore Association	Hastoe Housing Association
Aldeburgh Business Association	Home Office
Aldeburgh Society	Hopkins and Moore Ltd
Ashton Allen Design	Sir Richard Howitt MEP
Babergh District Council	IPSENTA
Bloor Homes	Ipswich Borough Council
Bovis Homes Ltd	Ipswich Caribbean Association
Campaign to Save our Rural Roads	Landlink PLC
Chater Homes	Leiston Business Association
Civic Trust	Michael Lord MP
Coastal Housing Action Group	Martlesham Heath Neighbourhood Association
County Councillors in the District	Mid-Suffolk District Council
Country Land & Business Association	National Farmers Union
Defence Land Agent	Orbit Housing Association
DEFRA	Orwell Housing Association
East of England Development Agency	Park Road Residents' Association
East of England Tourist Board	Stuart Reid
East Suffolk Coalition of Disabled People in Action	Rural Housing Trust
English Rural Housing Association	SALC
Farming and Rural Conservation Agency	Sanctuary Housing Association
Felixstowe Chamber of Trade & Commerce	Saxmundham Business Association
Felixstowe Ferry Preservation Society	Shaftsbury Housing Association
Felixstowe Town Centre Residents' Association	South Hill Area Residents' Association
Fielden Ltd	Suffolk ACRE
Flagship Housing Group Ltd	Suffolk Coastal Business Forum
Framlingham and District Local History &	Suffolk Heritage Housing Association
	Suffolk Police Architectural Liaison Officer
	Trimley Preservation Society



Preservation Society  
Framlingham Business Association  
Gujarati Community  
John Gummer MP

Waveney District Council  
West of Felixstowe Residents' Association  
Wilcon Homes Anglia Ltd  
Woodbridge Chamber of Trade & Commerce