

Housing Supplementary Planning Document (SPD) Consultation Statement – November 2024

Introduction

Babergh and Mid Suffolk District Councils adopted the Babergh and Mid Suffolk Joint Local Plan Part 1 Development Plan Document (DPD) in November 2023. The Joint Local Plan Part 1 DPD contains strategic and local (development management) policies to guide development proposals in the Districts. Following adoption of the Joint Local Plan Part 1 DPD, the Councils produced a draft Housing SPD for consultation. This statement summarises the main issues raised in the comments received and how those issues have been addressed in the SPD.

Public consultation on the draft Housing SPD

Public consultation was undertaken between 15th May and 19th June 2024, for a period of five weeks, in accordance with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). At this formal stage of consultation, all those registered on the Councils' Joint Local Plan mailing list were directly consulted, including statutory consultees and Town and Parish Councils, and a notice was published in the local press and on the Councils' websites. Details of the consultation along with the documentation was also made available to the public on the Councils' websites and can be viewed via the page below along with copies of the full representations.

<https://baberghmidsuffolk.oc2.uk/document/77>

Hard copies were deposited at the Councils' office at Endeavour House, 8 Russell Road, Ipswich, IP1 2BX (weekdays 8am to 5pm), and at the Customer Access Points at Sudbury Library, Market Hill, Sudbury, CO10 2EN (Mondays and Thursdays 9am to 5pm) and 54 Ipswich Street, Stowmarket, IP14 1AD (Tuesdays 10am to 5pm and Fridays 9am to 4.30pm).

Comments could be made electronically through the Councils' online system via the published weblinks; by email to localplan@baberghmidsuffolk.gov.uk; or in writing to the Strategic Planning Policy Team, Babergh and Mid Suffolk District Councils, Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX.

16 organisations or individuals commented on the draft Housing SPD as follows:

- Historic England
- Natural England
- Breckland District Council
- East Suffolk Council
- Suffolk County Council
- NHS Property Services Ltd

- Lavenham Parish Council
- Harris Strategic Land Ltd
- Pigeon
- Ballymore Group and Two Private Individuals
- M Scott Properties Ltd
- Hopkins Homes
- Taylor Wimpey UK Ltd
- Persimmon Homes (Suffolk)
- Two Private Individuals.

The table below provides a summary of the main issues raised in the consultation responses, the Councils' response and where the SPD has been revised.

Chapter 1 – Introduction / General comments			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
NHS Property Services Ltd / 23562	<ul style="list-style-type: none"> - Suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. - Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. - Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). - Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. 	<p>Noted, but these are not matters which can be resolved by the SPD.</p> <p>Can be considered for future evidence base work and SPD would be flexible enough to account for delivery of key worker housing.</p>	No change.

Private Individual / 23565	Raises issue of conflict in objectives between the Biodiversity & Trees SPD and the Housing SPD.	Planning system is capable of managing and resolving competing priorities.	No change.
	Highlights issue with Call for Sites submissions not being published and questions transparency, community cohesion and trust in the overall planning process.	Not a matter for this SPD.	No change.
Private Individual / 23566	Raises issue of conflict in objectives between the Biodiversity & Trees SPD and the Housing SPD.	Planning system is capable of managing and resolving competing priorities.	No change.
	Asks who will be responsible to undertake the 'Local Housing Needs Survey'.	There is no necessity for local housing needs surveys apart for certain developments coming forward under Policy LP07. These will be commissioned by community housing groups.	No change.
	Requests that individuals submitting sites in call for sites are identified.	Not a matter for this SPD.	No change.
Taylor Wimpey UK Ltd / 23572	As a general starting observation, from a reader's perspective it is considered that the Housing SPD is not particularly user friendly. There are a number of inconsistencies in terms of formatting, language, and the placement of certain topics within the document which make it difficult to navigate and find the relevant section. Given the wide range of potential users, consideration should be given to improving the 'usability' of the document.	No examples given, so cannot be resolved.	No change.
Natural England / 23574	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to	Noted. Policies have been subject to SEA.	No change.

	<p>have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <ul style="list-style-type: none"> - Biodiversity enhancement - Landscape enhancement - Protected Species <p>While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>		
East Suffolk Council / 23593	<p>General comments are that the Supplementary Planning Documents would benefit from a contents page that is interactive, allowing the reader to click on a listed section and jump to the appropriate page number. Hyperlinking policies to the area of the Local Plan where those policies are explained in full would also be useful. More images throughout the document would also help to support the text and create more visual separation between sections.</p>	Noted.	No change to substantive text.
Historic England / 23606	<p>Confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on these and related documents.</p>	Noted.	No change.

Chapter 2 – Local Plan Policies			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
Private Individual / 23565	2.1.7 – Present draft wording is weak in respect of definition of minor development, when mix is to be considered and by whom.	Minor residential development is defined through SP02 and the regulations. Implicit that mix is considered by the Council as part of the decision-making process.	No change.
	Proposes a new numerical threshold for consideration of housing mix.	The SPD cannot set new policy.	No change.
	2.1.15 – The present draft wording fails to emphasise that any deviation from established assessed housing needs, in order to accommodate a specific scheme must still fully satisfy other critical criteria eg NPPF Sustainability requirements.	Noted. This point could be clearer.	2.1.15 – With regard having been given to housing needs evidence as a starting point for designing a residential scheme, deviations from the evidenced needs may be justified with regard to the site context <u>and the requirements of other policies of the development plan</u> . Examples of ways in which context might allow for deviations from housing needs include:
	2.1.16 – The draft wording is not in their view at all appropriate. Should make pre-application advice obligatory.	The Councils cannot enforce a requirement for pre-application advice.	No change.

	<p>2.2.2 – The draft should be amended to give clear examples of the "exceptional circumstances" where affordable housing requirements might be varied. Should make position clear that proposals that don't meet affordable housing requirements will be refused.</p>	<p>We cannot be exhaustive in giving examples. 2.2.20 already sets out that the Council will be likely to refuse applications that don't meet requirements.</p>	<p>No change.</p>
	<p>2.2.16 – The draft wording is much too loose eg what does "willing to deviate from policy (which policy?) requirements " mean?</p>	<p>This is in the section on SP02 in reference to affordable housing, so is sufficiently clear.</p>	<p>No change.</p>
	<p>2.2.18 and 2.2.19 – Both these paragraphs should be deleted - as drafted they fundamentally undermine the affordable housing objective and relegate the critical importance of paragraph 2.2.20.</p>	<p>Disagree. These paragraphs help guide the way in which the Councils would look to claw back commuted sums where viability challenges are proven.</p>	<p>No change.</p>
	<p>2.2.20 – Insert the word "highly" before the word "likely".</p>	<p>Each case needs to be assessed on its merits. Although the SPD could be firmer in explaining that affordable housing is a key component of sustainable development.</p>	<p>2.2.20 – The Councils are likely to refuse applications which do not provide for affordable housing in line with policy requirements and this SPD. <u>Whilst viability is a consideration under SP02, the Councils also consider delivering affordable housing to be a key component of sustainable development and so the absence of affordable housing may lead to refusals even where viability challenges are proven.</u></p>

	<p>2.2.22 – The present draft wording needs improvement. Make clear that alternative site must be identified at pre-app and off site works completed first.</p>	<p>A version of this would be helpful.</p>	<p>Where affordable housing is to be provided on an alternative site, the Councils will need certainty of delivery in order to accept this approach. <u>A site will need to be identified and shown to be deliverable before or at the same time as the main site.</u> This <u>requirement</u> will be secured by planning obligation.</p>
	<p>2.32 – Replace the word "may" in line 3 with the word "will".</p>	<p>A version of this would be helpful.</p>	<p>Where it appears that a small site, below the threshold for major residential development, is capable of further development which would take the scheme over the threshold, the Councils may <u>will normally</u> attach an informative note to any planning permission granted to alert the applicant to the likelihood of affordable housing provision being required from future phases as set out above.</p>

	2.5 – Need for further safeguards in this section to curtail the practice of planning applications being made under the guise of replacement structures but are simply schemes that inappropriately intensify the use of the land by extending the curtilage or building outside development boundaries.	Policy LP04 is sufficiently prescriptive.	No change.
	2.4 – Paragraph wrongly concentrates solely on the process of obtaining financial contributions rather than anything at all about how improvements to actual infrastructure will be achieved.	This is not a matter for this SPD.	No change.
Private Individual / 23566	2.1.12 – Doesn't refer to local financial affordability.	This paragraph does not apply to the assessment of need for affordable housing.	No change.
	2.4 – Inadequate approach to infrastructure management.	This is not a matter for this SPD.	No change.
M Scott Properties Ltd / 23570	2.1.13 – Unnecessarily restrictive.	Disagree. In order to determine whether needs are being met, the Councils need a metric for determining whether a room should be considered a bedroom.	No change.
	2.2.24 (vii) – Delete paragraph as SPD shouldn't seek to limit number of storeys for affordable housing.	This paragraph does not prevent affordable homes of more than 3 storeys where appropriate.	No change.
	2.2.25 – 2.2.26 – Pepper potting diagram should have larger clusters of affordable homes. Makes RP management easier and otherwise has a negative impact on sales values for market units.	The diagram is indicative only. Paragraph 2.2.25 indicates that a balance needs to be struck between pepper potting and RP management requirements.	No change.

<p>Taylor Wimpey UK Ltd / 23572</p>	<p>2.1.5 – The open market housing mix set out within this SPD has been based upon an out-dated Strategic Housing Market Assessment (SHMA) and it should allow for greater flexibility to agree open market housing mix on a case-by-case basis.</p>	<p>The SHMA is not a matter for this SPD. The SPD already allows for flexibility. The SHMA data is the starting point</p>	<p>No change.</p>
	<p>2.1.13 – With health and well-being in mind, it could be extremely detrimental to work in a room that is not large enough to accommodate a single bed, just so that it cannot be considered as a ‘bedroom’.</p> <p>2.1.13 should be amended to set out that floor plans should ensure that a designated office/study should be located on the ground floor to deter it from becoming a bedroom.</p>	<p>The Nationally Described Space Standard prescribes that a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide. Officers are not aware of any evidence to demonstrate any detriment to working in rooms of this size or smaller.</p> <p>However, it is accepted that there is some merit to enabling ground floor bedrooms.</p>	<p>2.1.13 – Floorplans will be assessed to ensure that homes are not built with a surplus of rooms which can <u>have the potential to be used as additional bedrooms. This is to help ensure that new housing development meets identified needs.</u></p> <p>Home working is supported and as such the provision of one room identified as an office or study may be supported, but the size and dimensions of <u>upstairs</u> offices/studies will be considered against the Nationally Described Space Standard to determine whether they are likely to be usable as bedrooms, in which case they may be considered as such other rooms which have the potential to be used as bedrooms (other than primary living rooms, primary</p>

			<p>dining rooms, kitchens, rooms with mains plumbing/toilets or rooms with no windows and/or main entrances) will be considered as such for the purposes of Policy SP01. <u>In the case of single storey homes, this assessment will apply to all rooms.</u></p> <p><u>Primary living rooms, primary dining rooms, kitchens, rooms with mains plumbing or toilets, rooms with no windows and rooms with external entrances will not be considered to be bedrooms.</u></p>
	<p>2.2.9 – Notwithstanding the comments above that the SHMA is somewhat dated, in addition to this Taylor Wimpey would welcome further evidence of need, particularly in relation to intermediate tenures, such as shared ownership and discount market housing. A waiting list for these tenures would be useful for the Council to compile as Taylor Wimpey understand, through insight from Housing Expectations Ltd. that these intermediate products are needed and demanded. However, this is often not fully identified within the SHMA. A Council waiting list would provide clear evidence of need.</p>	<p>Since the end of the Homebuy Agent, there is no equivalent to a waiting list for intermediate tenures.</p>	<p>No change.</p>

	2.2.26 – Clusters of up to 15 are acceptable, however if the Council insists that these must comprise a mix of tenures within these clusters, this would not be acceptable to a number of Registered Providers as it would not be conducive to effective management. Has the Council engaged with Registered Providers on this matter?	Yes – RPs were consulted and this point has been discussed further. In the experience of officers, RPs are content to have more than one tenure in each cluster, albeit they prefer that different tenures are not physically contiguous. The pepper potting diagram applies this approach, and is only indicative.	No change.
Breckland District Council / 23576	2.2.7. To clarify - Is that if a developer brings forward multiple sites, they're not allowed to utilise one site to deliver all the affordable housing and then only market led on the remaining sites.	To clarify.	2.2.7 – 100% affordable housing schemes or other developments with additional affordable housing (exceeding policy requirements) cannot be relied upon as justification for non- or under-delivery on other, market-led housing developments; Policy SP02 makes clear that major residential development is required to make provision for affordable housing. <u>This does not preclude off-site provision of affordable housing, as set out below in the section on 'Alternatives to on-site provision'.</u>
	2.4.2, we'd recommend '...this will usually be secured via planning obligations 'and/or' payments through the Community Infrastructure Levy (CIL).', as there could be instances where Section 106 and CIL is appropriate.	Agreed.	2.4.2 – Subject to any reforms to infrastructure funding by Government, this will usually be secured via planning obligations <u>and/or</u> payments through the

			Community Infrastructure Levy (CIL).
Hopkins Homes / 23580	2.1.6-2.1.7 concern that paragraphs appear to suggest that the identified mix will be strictly enforced. Indeed the only allowances for a change from this mix are where it is justified by a localised assessment or where the proposal is for minor residential development. We consider that such a strict enforcement would conflict with Policy SP01 which simply states that the mix of housing "should be informed by the relevant District needs assessment" (emphasis added). Also note that the data in the table presents a combined need derived from the separate needs identified in the SHMA for owner-occupied and private rent accommodation. Support this in principle, but given that different parts of the district will have different demand for private rental properties, this further indicates why there is a need for flexibility in how the identified mix is applied.	Disagree – these paragraphs do not give rise to rigid enforcement. 2.1.15 explains how deviations can be justified.	No change.
	2.2.9 – suggest prescribing a preferred tenure split.	Not supported, as evidence on affordable housing need may be updated.	No change.
Harris Strategic Land Ltd / 23585	2.7 – presents a case that specific sites should be allocated for retirement villages in the Development Plan.	Not a matter for this SPD.	No change.
Pigeon / 23594	2.1.5 – Although, the SHMA may present an appropriate 'starting point', given its age (it is now 5 years old) and the fact that it represents a snapshot in time, we would suggest that it is inappropriate to use this as the basis for an overly prescriptive housing	The SPD allows for flexibility.	No change.

	<p>mix requirement. The SPD should provide suitable flexibility to allow housing mix to be agreed on a site-by-site basis taking into account all requirements, including the site's context.</p>		
	<p>2.2.9 – seeks further clarity on tenure split requirements.</p>	<p>Not supported, as evidence on affordable housing need may be updated.</p>	<p>No change.</p>
	<p>2.2.10 – While we would typically seek pre-application advice before submitting an application, we do not consider that this should be a mandatory requirement, as draft para 2.2.10 implies.</p>	<p>The word 'preference' is not considered to equal 'mandatory requirement'.</p>	<p>No change.</p>
	<p>2.2.15 – Whilst we would typically engage with the Councils Housing Officers at the preapplication stage, as per our comments in respect of 2.2.10. this should not be a mandatory requirement, particularly where housing mix is not being determined, as is the case with an outline application.</p>	<p>The words 'Strongly recommend' are not considered to mean 'mandatory'.</p>	<p>No change.</p>
	<p>2.2.16 – 2.2.20 – Whole Section. We suggest that the SPD should include an affordable housing cascade mechanism as an option. This should include the steps that the Council will require applicants to take where there is no interest from a Registered Provider. This should include the process for agreeing an alternative tenure split with the Council and in the event that there remains no interest from a Registered Provider, the ability for affordable homes to be delivered as market homes with a commuted sum payable to the Council.</p>	<p>To be considered for a position statement. This is an evolving situation and a standalone position statement will allow for this topic to have more thorough consideration.</p>	<p>No change.</p>

	<p>The SPD should include the level of contribution for different sizes and tenure of affordable housing (which may be index linked) to avoid the requirement for site specific valuation. While this may only be required in exceptional circumstances, we consider that it is important to include such a mechanism to ensure the delivery of new homes across the District and to avoid unnecessary delays in the event of changes to market conditions and/or national planning policy.</p>	<p>Commuted sum in Chapter 6 accounts for this already.</p>	
	<p>2.2.24 – desirability of different parts of sites is a subjective term. Shouldn't limit clusters of affordables to 15 as this is not evidenced and is too prescriptive.</p>	<p>Cannot be exhaustive in list of less desirable areas.</p> <p>SPD does not prevent larger clusters where justified, but is not encouraged or sought so as to aid social interaction as per national policy and guidance.</p>	<p>No change.</p>
	<p>2.3.2 SPD should provide further information on updating evidence on GRT needs.</p>	<p>Not a matter for the SPD. Accommodation Needs Assessment was published earlier this year, and will be considered as part of JLP Pt. 2.</p>	<p>No change.</p>
	<p>2.9.4 – acknowledge that the approach in the SPD is in line with the Planning Practice Guidance (PPG) and agree with the principle of prioritising people who pass the local connection test, we recommend that the Councils also consider the demand arising from Part 2 of the register as this still constitutes legitimate demand for custom/self-build homes in the districts.</p>	<p>The Councils will consider the demand from Part 2 in line with the Planning Practice Guidance.</p>	<p>No change.</p>

Ballymore Group and Two Private Individuals / 23596	2.1 – SHMA is dated evidence and not locally-specific.	SPD allows for flexibility in open market mix.	No change.
	2.1.10 – The SPD should thus recognise that a landowner, land promoter, housebuilder or developer’s knowledge of the local market will also play an important role in determining what the appropriate open market housing mix is for a site. This will allow the latest housing need data to be considered, as well as local market factors rather than relying on a housing mix that is based on district-wide data and relates to a specific point in time.	Disagree – demand and need are not the same thing.	No change.
	2.1.14 – As dictated by national planning guidance, planning permissions should not be subject to unnecessary conditions. This paragraph should be deleted.	Disagree – recent precedents suggest otherwise.	No change.
	2.2.11 – SPD should refer to other relevant evidence for determining affordable housing requirements, such as the housing register and RP understanding of demand. Housing officers should be clearly offered as part of the pre-application advice service.	This is indeed relevant. Small amendment made, although SPD as drafted would not have prevented this. Not a matter for this SPD but Housing officers are available for pre-app.	2.2.11 – Consideration <u>will be given to evidence from the relevant Housing Register</u> and also be given to any relevant and suitably prepared local housing needs survey, particularly to influence the required mix of unit sizes. Unless required by a made Neighbourhood Plan, the Councils will not usually seek to vary required tenures based on a local needs assessment due to the geographic context; local housing needs surveys tend to identify the needs of a parish, whereas affordable

			housing secured on market-led schemes via the planning system is justified on the basis of meeting district-wide needs.
	2.2.9 – First Homes are not considered.	First Homes are referred to in 3.2, which explains that the Councils are covered by the transitional arrangements. Furthermore, the recent NPPF consultation suggests that First Homes will cease to be a Government requirement.	No change.
	2.2.24 – Disagrees with the preference for affordable homes to be in clusters of no more than 15. Suggests it should have been a policy tested at examination.	Disagree. The SPD is not policy. Wording is to help explain how integration is to be delivered, and to aid developers in securing an RP.	No change.
Persimmon Homes (Suffolk) / 23603	2.1.13 – Clarification required. What is the justification that studies meet the NDSS size for bedrooms?	The justification is in the paragraph already. Studies are not to be required to be the same size as bedrooms.	No change.
	2.2.24 – Do not support limit of 6 x 1-bed affordable units.	SPD allows for site circumstances to be taken into account.	No change
	2.2.2 – 2.2.4 – There is discrepancy between whether the percentage of affordable housing is set or is a minimum; the wording is confusing here. There needs to be clarity on how the Council will request housing above the 25% or 35% and what will be the justification for a request above the 25% and 35%. These uncertainties will cause viability issues for Applicants which will inevitably slow down the bringing development forward.	This is not considered to be unclear.	No change.

	<p>Para 2.2.9 – 2.2.10 – Persimmon Homes Suffolk request that the Council seeks to be dynamic in their preferred Affordable Housing Mix to ensure that there is capability to adapt to the changing market. Flexibility in offering other types of Affordable Housing will help deliverability of schemes and therefore more Affordable Housing too.</p>	<p>The SPD does not prevent this, but this has been clarified in 2.2.16.</p>	<p>2.2.16 – In exceptional circumstances, where proven through a viability assessment, the Councils may be willing to deviate from policy requirements. As set out in the Joint Local Plan, if it is convincingly demonstrated that the viability of a scheme is such that affordable housing makes development unviable, changes to the mix of affordable tenures will be considered first, then changes to the size and type of affordable dwellings. <u>The Councils will seek to be flexible and creative in order to support delivery.</u> But to be clear, whilst some forms of affordable home ownership offer a stronger boost to viability than other tenures, the priority remains meeting needs. A reduction in the overall number of affordable dwellings will only be considered as a final step.</p>
	<p>Para 2.2.17 – Persimmon Homes Suffolk queries what would happen if this format was not able to be adhered to, is there any flexibility in exceptional circumstances?</p>	<p>This is a policy requirement and will be treated as such.</p>	<p>No change.</p>

	<p>Para 2.2.18 and 2.2.21 – A clear calculation needs to be provided to avoid any doubt or disagreements on what is classified as surplus. This will also allow Applicants to calculate viability of scheme.</p>	<p>Agreed. Amendment made.</p>	<p>2.2.18 Where the Councils grant permission for a proposal which does not deliver any affordable housing <u>due to acceptance of a viability constraint</u>, a <u>clawback mechanism to secure a</u> commuted sum will be sought instead. This will be based on a percentage <u>at least 50%</u> of any surplus profit that a proposal generates, identified through further reviews of scheme viability <u>and an assessment of any increase in sales values</u>. Such provision will be secured via a planning obligation and will come into effect with either of the following criteria coming into effect:</p> <p>2.2.19 Larger schemes which do not make provision for a policy-compliant level of affordable housing will be required to provide updated viability evidence at key points during the delivery of the scheme and upon completion of the scheme. If an unexpected surplus is identified through this mechanism <u>and it is</u></p>
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			<u>accepted that later phases cannot provide more affordable homes, a proportion at least 50% of the surplus will be collected as a commuted sum for the provision of affordable housing elsewhere.</u>
	2.2.24 – ‘less desirable’ should be defined.	No definition could be exhaustive.	No change.

Chapter 3 – Affordable Housing Needs and Tenures			
Respondent / Rep ID	Comment Summary	Councils’ Response	Action
Taylor Wimpey UK Ltd / 23586	<p>3.3.6 – Additional evidence should be compiled in the form of waiting lists to determine affordable housing need for intermediate tenures, as they are important affordable products where the ‘need’ is not usually fully identified within SHMA’s.</p> <p>There is need and demand for Discounted Market Sale housing, as evidenced within these representations.</p>	Clarify SHMA guidance on Discounted Market Sale. Need and demand are not the same.	<p>3.3.6 – The <u>current SHMA sets out that demand for evidence has assessed this tenure is unproven, and is assessed as being less affordable than entry-level market rent properties, and advises that the potential demand for this tenure should be treated as an indicative figure rather than an absolute target.</u> As such it will not normally be sought through planning obligations to fulfil affordable housing need.</p>
Hopkins Homes / 23580	3.2 – Request a fuller explanation of the Councils’ position on First Homes, to be moved to 2.2.	There is no more to say, particularly given that the more recent NPPF consultation indicates that First Homes will no longer be prescribed.	No change.

<p>Persimmon Homes (Suffolk) / 23603</p>	<p>Lastly, there is also little in here on First Homes. There needs to be clear guidance on this, the Council's policy position, income caps, discount levels and OMV caps. These will affect viabilities for Housebuilders and therefore effect deliverability of sites.</p>	<p>Unnecessary change as would be inconsistent with current and emerging Government policy.</p>	<p>No change.</p>
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Chapter 4 – Affordable Housing Delivery			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
<p>Taylor Wimpey UK Ltd / 23572</p>	<p>4.3 – While 4.3.3 does acknowledge that there may be some flexibility on smaller schemes, it should also be recognised that this could present real challenges to larger schemes. A universal trigger should not be applied.</p> <p>Deals can sometimes fall through, and therefore stalling construction on site due to the lack of a Registered Provider is neither within the Council's or the developer's interests. It should made clear that the requirement is for the affordable homes to be 'made ready for transfer and marketed' rather than fully transferred, as this will unnecessarily slow down site delivery.</p>	<p>The SPD is not prescriptive and allows for flexibility.</p>	<p>No change.</p>
	<p>4.6.7 - The current wording of this document very much discourages 'Approved Providers', stating that transfer to these should only happen in 'exceptional circumstances.' The SPD should encourage a more flexible approach to using 'Approved Providers', as they can be important to the delivery of affordable housing.</p>	<p>The paragraph allows for Approved Providers when appropriate.</p>	<p>No change.</p>

Ballymore Group and Two Private Individuals / 23596	4.2.3 should clarify whether, if the residual affordable housing requirement is to be provided as an additional dwelling in lieu of a financial contribution, the requirement must always 'round up'. To take the example given, if the residual requirement was 92.25 rather than 92.75, would the affordable requirement remain 92 dwellings.	Requirement is not to round up on site. Attempt at clarifying made.	4.2.3 – A developer may choose to 'round up' and provide an additional dwelling on site in lieu of a financial contribution <u>as set out above</u> . This approach <u>of exceeding the 35% requirement on site</u> is acceptable but would not be required in order to grant permission.
	4.3 – should be flexible in respect of phasing.	SPD allows for flexibility.	No change.
Persimmon Homes (Suffolk) / 23603	4.3.2 – further flexibility should be introduced for transfer of homes to an RP.	Not required – SPD allows for flexibility.	No change.
	4.6.2 – 4.6.4 - Are Housebuilders restricted to the Council's list of Registered Provider? There should be flexibility for the Housebuilders to choose a Registered Provider and an understanding of the current market for Registered Providers. Are the Council's preferred Registered Providers currently seeking Affordable Housing provisions at this time?	No they are not, but the Council should retain the right to approve or decline RPs.	No change.

Chapter 5 – Affordable Housing Design			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
M Scott Properties Ltd / 23570	5.1.4 – paragraph should not limit the number of 1-bed units in one cluster. Paragraph appears to prevent consideration of site circumstances.	This is to aid housing management. SPD does not have the status of policy – it does not prevent site circumstances being considered.	No change.

	5.1.5 – SPD should not seek to prescribe specifications of affordable homes. Should be left to negotiation between RPs and developers.	This paragraph does not prevent RPs from negotiating their own requirements.	No change.
Taylor Wimpey UK Ltd / 23572	This section generates an element of confusion in terms of whether there are any principles within this section which relate to affordable housing only. Given this section is providing greater information in relation to LP24, it would perhaps sit better within the Design SPD, which we understand is forthcoming.	The section shows that LP24 applies to affordable housing just as it does to market housing. The affordable housing-specific elements are helpfully considered in this document.	No change.
	5.1.6 Taylor Wimpey are unsure why there is relevance between the size of the dwelling and the requirement for a shower room on the ground floor. Requirements for accessible homes are covered within M4 of the Building Regulations. Taylor Wimpey consider that this is an unnecessary requirement for all four bed homes.	This is to apply to affordable homes, to help manage changing family circumstances and has been requested by an RP.	No change.
Suffolk County Council / 23600	5.1.3 – consideration is needed for exceptions under some circumstances for the inclusion of communal spaces within specialist and supported housing. Flats may also be appropriate, dependent on the intended use and needs of individuals.	Amendment made.	5.1.3 – Communal areas should be avoided in order to avoid service charges. In most circumstances maisonettes will be preferable to flats. <u>Some forms of affordable housing, such supported housing, or housing with care, may require communal areas. This will be considered according to the nature of the proposal.</u>

	<p>5. consideration is needed regarding the amount of affordable housing that would meet the M4(2) standard with the majority meeting this requirement where possible.</p>	<p>Amendment made – new paragraph.</p>	<p><u>LP24 requires that 50% of new homes meet part M4(2) of the Building Regulations. Pending any update to the Building Regulations, the Councils will seek to maximise the proportion of affordable homes which meet the M4(2) requirement within the total 50% requirement. No fewer than 50% of the affordable homes should meet the M4(2) standard.</u></p>
<p>Persimmon Homes (Suffolk) / 23603</p>	<p>5.1.6 - Housebuilder house types may not support this Principle and Persimmon Homes Suffolk ask for the justification behind a downstairs shower room.</p> <p>Overall, Persimmon Homes Suffolk would seek more flexibility in this SPD and to reflect the changing trends in the affordable housing sector. This SPD does not include how the Council would adapt to the ever changing environment; this SPD needs to go further to demonstrate how issues can be resolved in order to maintain housing supply. There needs to be flexibility in tenure delivery and cascades where Registered Providers are unable to proceed to offer/contract on reasonable commercial terms.</p>	<p>This is to apply to affordable homes, to help manage changing family circumstances and has been requested by an RP.</p> <p>To be considered for a position statement. This is an evolving situation and a standalone position statement will allow for this topic to have more thorough consideration.</p>	<p>No change.</p>

Chapter 6 – Commuted Sums			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
M Scott Properties Ltd / 23570	6.1.2 - The reliance on district-wide viability evidence has the potential to generate unrealistic commuted sums. Recommend that the SPD be amended to include a mechanism for the applicant to be allowed to submit site-specific evidence to demonstrate an alternative commuted sum that ensures the delivery of the site.	If commuted sums are unviable for specific developers, they can submit viability appraisals. This is already allowed for under SP02 and explained in 2.2.16 – 2.2.20 of the SPD.	No change.
	6.1.4 – We do not believe that the slight reduction of the affordable requirement (to 25%) provides a realistic solution to developing brownfield sites. As with our comments on para 6.1.2 above, we would advise that the Council should accept site-specific evidence to inform an alternative level of affordable housing and/or commuted sum.	This is not a matter for the SPD – it was considered, and the requirement set, through the examination of the Joint Local Plan.	No change.
	6.1.5 - 6.1.6 – It would be helpful for the reader if the SPD was clear in what scenarios the per unit or £psm could be used and who decides. We would recommend that the applicant choose which route they wish to take.	Amendment to be made to better explain function of £psm figure. New paragraph.	<u>The £psm approach will be used on single dwelling sites which are major development by virtue of the overall site size.</u>
	6.1.8 – Proposed adjustments are too broad.	Disagree. Proposed adjustments are a proportionate approach.	No change.
Hopkins Homes / 23580	6.1.5 – 6.1.7 – There would appear to be an error at paragraphs 6.1.5-6.1.7. The rates quoted in the table at 6.1.5 are different from those included in the worked examples at paragraphs 6.1.6 and 6.1.7.	Agreed. This is an error.	A worked example for the £psm approach would be: - A development of a single dwelling with a

			<p>gross internal area of 200m² on a 0.55ha site.</p> <ul style="list-style-type: none"> - 35% of 200m² equates to a requirement equivalent to 70m². - £1,400 <u>£1,188</u> multiplied by 70 equals a commuted sum requirement of £83,160.
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Chapter 7 – Planning Obligations Heads of Terms			
Respondent / Rep ID	Comment Summary	Councils' Response	Action
M Scott Properties Ltd / 23570	7.1.1 – concern that agreeing these heads of terms will slow the grant of permissions.	SPD doesn't insist that these matters are agreed, and will speed the agreement of planning obligations post-resolution to grant permission.	No change.
Taylor Wimpey UK Ltd / 23572	<p>Taylor Wimpey supports the idea that all parties should endeavour to agree the affordable housing heads of terms prior to a recommendation of approval.</p> <p>There should be reassurances from the Council that once a resolution to approve has been made, the legal process towards signing the Section 106 will be quicker because heads of terms have already been agreed.</p> <p>It is understood that this section only focuses upon agreeing affordable housing requirements prior receiving a recommendation of approval. Will the same apply for all other Section 106 contributions?</p>	The Councils always seek to complete s106s as quickly as negotiations allow. Other obligations can be considered at a later date.	No change.