



**Riverside, 4 Canning Road, Lowestoft, Suffolk,
NR33 0EQ**

Cabinet

Members:

Councillor Steve Gallant (Leader)
Councillor Craig Rivett (Deputy Leader and Economic Development)
Councillor Norman Brooks (Transport)
Councillor Stephen Burroughes (Customer Services, ICT and Commercial Partnerships)
Councillor Maurice Cook (Resources)
Councillor Richard Kerry (Housing)
Councillor James Mallinder (The Environment)
Councillor David Ritchie (Planning & Coastal Management)
Councillor Mary Rudd (Community Health)
Councillor Letitia Smith (Communities, Leisure and Tourism)

Members are invited to a **Meeting of the Cabinet**
to be held in the Conference Room, Riverside,
on **Tuesday, 3 May 2022 at 6.30pm**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at <https://youtu.be/j08Vw-ngWrk>

An Agenda is set out below.

Part One – Open to the Public

1 Apologies for Absence

To receive apologies for absence, if any.

2 Declarations of Interest

Members and Officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.

3 Announcements

To receive any announcements.

KEY DECISIONS

4 Data Analytical Capacity ES/1123

1 - 15

Report of the Cabinet Member with responsibility for Customer Services, ICT and Commercial Partnerships.

5 Consultation on, and Revocation of Woodbridge Air Quality Management Area ES/1124

16 - 133

Report of the Cabinet Member with responsibility for the Environment.

6 Affordable Housing Supplementary Planning Document ES/1127

134 - 468

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

7 HRA Fire Safety Strategy ES/1125

469 - 486

Report of the Cabinet Member with responsibility for Housing.

8 Community Housing Fund Spend Policy ES/1126

487 - 508

Report of the Cabinet Member with responsibility for Housing.

9 Exempt/Confidential Items

It is recommended that under Section 100A(4) of the Local Government Act 1972 (as amended) the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraphs 1, 2 and 3 of Part 1 of Schedule 12A of the Act.

Part Two – Exempt/Confidential

KEY DECISIONS

- 10 Electoral Services Specialist Printing Tender**
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).
- 11 Property acquisition works and adaptations for an exceptional housing needs case**
- Information relating to any individual.
 - Information that is likely to reveal the identity of an individual.
- 12 Redevelopment of Affordable Homes – White Lion Flats, Beccles**
- Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.

NON-KEY DECISIONS

- 13 Anglia Revenues Partnership Fraud Services - Section 113 Agreement with Norwich City Council**
- Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Close



Stephen Baker, Chief Executive

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CABINET

Tuesday, 03 May 2022

Subject	Data Analytical capacity
Report by	Councillor Stephen Burroughes, Cabinet Member with responsibility for Customer Services, ICT and Commercial Partnerships
Supporting Officer	Sandra Lewis Head of Digital and Programme Management Sandra.lewis@eastsuffolk.gov.uk 01394 444205

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

Purpose and high-level overview

Purpose of Report:

To seek approval of growth in staffing budget for the Digital & Programme Management service area to appoint a Senior Data Analyst.

Options:

In assessing the options to address the needs outlined in this report, the following have been considered:

1. Appointment of a Senior Data Analyst to address capacity needs as detailed in this report.
2. Continue as we are, with limited data analytical capacity, utilising one-off pieces of work with SODA.
3. Commission specific pieces of work with a contractor or external supplier.

Option 1 is considered the most appropriate way forward to deliver a well-resourced, flexible and continuous approach to addressing the data needs of a modern authority.

Recommendation/s:

That Cabinet approves a supplementary budget increase of £65,508 including all on-costs for the appointment of a Senior Data Analyst role within the Digital and Programme Management service area.

Corporate Impact Assessment

Governance:

No negative impact on governance however additional resource to assist with managing and understanding data will have a positive impact on governance across the organisation, enabling us to have better insight into monitoring services and the performance of the organisation as a whole.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Strategic Plan

Digital Strategy

Environmental:

None, although delivery of the Strategic Plan Environment theme will benefit from greater data analysis capability.

Equalities and Diversity:

An Equality Impact Assessment has been undertaken (reference EQIA408619373) – this proposal will have a positive impact on protected characteristic groups because additional capacity within the council to better understand the data we hold about our district will enable us to work in a proactive way to understand inequalities across services, provide data to tackle/address inequalities, ensure our resources are focused on the right areas, and enable early intervention.

Financial:

Additional budget requirement as detailed in this report, Finance have been involved in and support this request for resources.	
Human Resources: Recruitment of an additional post, HR have been involved in and support this request.	
ICT: This proposal is to address capacity needs within this team.	
Legal: None	
Risk: <p>The risk if we do not move forward with this proposal, is that we cannot keep pace with the digital data demands of a modern council in terms of understanding our district, our customers and other key priority areas using data to provide insight to all services.</p> <p>This includes the risk that we cannot adequately deliver to Priority P17 of the Strategic Plan – Effective use of data.</p> <p>Without this post in place and proper data insight work, there is greater risk of the inefficient use of resources and less focussed delivery of services and projects. Early intervention and prevention initiatives are less likely to take place without the support of this resource, leading to greater costs to East Suffolk Council and more of our residents facing crisis.</p>	
External Consultees:	None

Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>

P14	Review service delivery with partners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P17	Effective use of data	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>How does this proposal support the priorities selected?</p> <p>This proposal directly addresses priority P17 – Effective use of data – by putting in place additional resource to take forward our ambitions of being a data-led authority. It also supports all other themes of the strategic plan, including governance, by providing a vital data service to underpin everything we do as an organisation – delivering the technical skills to provide insights and data analytics to the organisation as a whole, subsequently leading to improved delivery of front-line services across all areas of the council.</p> <p>This proposal is key to unlocking a better understanding of delivery of services, including providing better focus, efficiency and different perspectives on tackling the needs of the district and all who live in it. Unlocking the power of data in a co-ordinated and managed way will provide a vital next step for the authority.</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	The East Suffolk Strategic Plan states within priority P17 Effective use of data that we will be data led in the way we make decisions and the way we manage services.
1.2	A National Data Strategy published in 2020 by the <i>Department for Digital, Culture, Media & Sport</i> (DCMS) sets out the importance of data across all sectors and includes priority areas of action such as unlocking the value of data to help boost the economy; using data in a trusted way; and transforming government's use of data to improve public services.
1.3	The demand for data science skills will only increase. Research from DCMS predicts that data analysis will become the fastest growing digital skills cluster in the UK, increasing by an estimated 33% in the next five years.
1.4	The use of data plays an ever-increasing role in designing, delivering and transforming public services to improve outcomes and drive efficiencies. More data than ever is available to inform services and obtain greater insights into the needs of our organisation, the people within our district and the places we serve.

1.5	The data we hold, and held regionally or nationally by others, is growing exponentially and will continue to grow. The complexity and the requirements on the digital team to manage the data grows with it.
1.6	East Suffolk Council (or predecessor councils) has never had a specialist data analytical team which is unusual for a council of this size.
1.7	The Levelling Up the United Kingdom White Paper published in February 2022 sets out expectations on local government that include improved data and transparency, oversight and analytics, evaluation and experimentation. It states that “Monitoring local performance and policies is crucial if they are to be understood and responded to by local citizens and improved by local leaders over time.” It also sets out that a new local government body will be put in place to have oversight and drive transparency in this area.

2 Current position

2.1	<p>We do use data at East Suffolk, we use it every day in the work and decision making of the council, however there are several observations to be made:</p> <ul style="list-style-type: none"> • Many teams develop manual processes to report on siloed data, without the knowledge or expertise to fully analyse or efficiently manage it. • Considerable time and effort is being spent by officers whose specialism lies in other fields across the organisation (such as planning or housing) on data preparation, redundant processes, and ad-hoc reporting. • There are efficiencies to be made by making better use of centralised analytical skills to automate dynamic reporting and dashboard style visual aids to make information instantly accessible to services. • There are areas where we are not utilising data to inform service delivery to the extent we could be. • We are not fully joining up data sources across council services to present a joined-up view to understand issues or proactively address needs.
2.2	We know the possibilities we have available to us in utilising data for a more informed and joined up approach to service delivery, greater visibility of performance at all levels and efficient use of resources, however we lack capacity to deliver this vision. We do have access to SODA (Suffolk Office of Data Analytics), where there is a team of data analysts; however, this is delivered at a Suffolk-wide level based at Suffolk County Council and we do not have direct management of SODA resources to deliver the volume and depth of work at our local level, using our own data sources and systems. We have taken advantage of training opportunities and other joined-up working at a Suffolk level though, and the SODA network is a valuable resource to us.
2.3	We have one Data Analyst currently employed within the Digital & Programme Management service area, a Band 6 post which has been in place since October 2020, currently reporting directly to the Head of Service.
2.4	The existing Data Analyst, albeit in a relatively junior role, has already achieved some fantastic work in the field of data analytics, using resources such as PowerBI to develop dashboards and other insights – this has increased awareness across all teams of the power behind using data to inform service delivery, which we wish to take advantage of.
2.5	The ambitions of our strategic plan and level of demand on this single post cannot be met by this relatively junior member of staff and there is not enough capacity within the Head of Service role to fully lead this area of work and do it justice.

2.6	<p>A set of data-led principles have been developed by the Digital team in conjunction with a cross-organisational officer group, to underpin the direction and areas of focus to deliver to priority P17 Effective use of data, these principles are:</p> <p>Technical</p> <ul style="list-style-type: none"> • We will ensure the right technical foundations are in place to fulfil our aims of being a truly data-led authority which can only be fully realised when data is fit for purpose, recorded in standardised formats on modern, future-proof systems and held in a condition that means it is find-able, accessible, interoperable and reusable. • We will ensure our data is dynamically accessible from a single source of truth by implementing technical solutions to enable us to make better use of data, so there is a unified corporate approach to the way we manage data. • We will utilise PowerBI and other corporate technical solutions for data analysis such as our corporate GIS platform, so that information is presented consistently, from verified and dynamic sources once without duplication or manual handling of data where possible. <p>Data governance</p> <ul style="list-style-type: none"> • We will ensure that everything we do by being a data-led authority complies with data protection legislation • We will explore opportunities to share and join up information appropriately with other partners and agencies who will have a positive impact on our aims of being data-led and adhering to our data-led principles. • We will improve the quality of the data we hold, to make it more effective and drive better insights and outcomes from its use. <p>Understanding our district</p> <ul style="list-style-type: none"> • We will understand our district by using a variety of sources including nationally available demographic data, our own data from internal sources, spatial data, qualitative data and specific data we are able to share from partner organisations. • We will use demographic data to aid in decision making and understanding where issues and inequalities lie across the district to feed into all strategic themes of our Strategic Plan. <p>Performance</p> <ul style="list-style-type: none"> • We will understand the performance of our organisation by Strategic Plan theme, by use of dashboards to identify direction and progress against our priorities including key performance measures. • We will understand the performance of our services at a more granular level, by using verified, easily accessible and analysed data to assist managers in monitoring the performance of their own services and our impact on our communities and businesses. <p>Shaping services</p> <ul style="list-style-type: none"> • We will use data to assist at all levels of the organisation in decision making, feeding into business case development and providing evidence to support decisions taken. • We will use data to improve services, including by joining data up, to show where issues may lie and focus attention on delivering the right solution at the right time and in the right place to improve services to customers and improve internal processes.
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	<ul style="list-style-type: none"> We will use data to provide direction in the future planning of all services and strategic aims. <p>Early intervention</p> <ul style="list-style-type: none"> We will use data to make a difference in the services we provide, meaning that early intervention by use of data forecasting and analytical tools may prevent families or vulnerable people going into crisis, with a view to improving the lives of people in our communities, reducing demand on critical services and having a positive effect on the prospects of our communities and economy.
2.7	Technical – We do not currently have the capacity to put in place the technical architecture needed to manage our data in a more comprehensive way. Also, without an adequate level of technical support, service areas will struggle with sourcing, interpreting and leveraging data in the correct way to provide the type of insight we are capable of delivering to manage front-line services across the authority – we run the risk of services going in different directions to satisfy their data requirements in an uncoordinated or uninformed way.
2.8	Data governance – Everything we do is of course bound by data protection legislation; however, we know there are opportunities to explore better sharing of data with and from other agencies to provide a more rounded picture of people and places, of course working with the Data Protection team to facilitate this. We are also aware that in some areas we need to address issues of data quality, for consistency purposes or where there is lack of any usable data at all.
2.9	Understanding our district – A recent example of good use of data to inform decision making was through the use of data packs in Community Partnership meetings – these were pulled together as a one-off piece of work by SODA (Suffolk Office of Data Analytics) using high level demographic data. Our ambitions lean toward providing this type of insight about our district on a dynamic and more local basis, so that Members can understand their wards, managers can understand issues affecting their services and strategically we fully understand and utilise data about the demographic make-up of our district to aid in prioritising projects and making decisions.
2.10	Performance – We have recently been working to develop a new set of Key Performance Indicators (KPIs), to work alongside and monitor our delivery against the Strategic Plan. Delivery of fully functioning dashboards to provide Members, Senior Management and the public at-a-glance insights to our performance is a large piece of work that will need further capacity to fully deliver in the most efficient way. There are also opportunities to better provide managers with accurate and immediate access to lower-level detailed performance data about their services, which needs fully exploring and delivering across the whole authority.
2.11	Shaping services – One example of a recent piece of work where data has been utilised to great effect is adding a satisfaction rating to our transactional services on our self-service website portal. All customers are asked a simple question once they have completed a process – How likely are you to recommend our online services? Their subsequent ratings are used to inform our web team on how well each online process is performing, and poorly performing areas are investigated and improved. This can be translated to many examples of how we can use data to focus our attention to how best to shape the services we deliver, from where to build council houses to particular hotspots in fly tipping, for example. We can use data to ultimately deliver our services in a more efficient way.

2.12	Early intervention – We know there are opportunities to utilise data to better understand issues faced by our communities and do something about them before hitting crisis point, and we already have ambitions of this in our pilot project using a product called LIFT (Low Income Family Tracker). One example of better use of data may be the current cost of living crisis – understanding where people are at risk of poverty or being able to look for red flags where people could be going down a route of disaster, will give us the opportunity for early intervention to assist people heading towards crisis, meaning potentially preventing homelessness or assisting in lifting people out of poverty situations. This not only helps the people involved but would also prevent further demand on our services in addressing homelessness or debt recovery procedures reactively.
2.13	Peer review recommendations – The recent LGA Peer Challenge highlighted a need to shore up capacity and recommended another hot house to refresh the Council’s approach to focus on prioritisation, capacity, capability, governance and oversight. Data is clearly central in enabling the Council to improve itself in these areas. Data will help shape and define areas of priority and focus. It will then provide an objective basis against which we can assess our progress, in terms of performance and oversight. Clearly, working in a focussed, more data led way will make better use of existing resources and greatly assist with the Council’s capacity issues.
2.14	In conclusion, we have proven examples where using data in a more joined up and proactive way leads to tangible results – including achieving cost savings, increasing productivity or more focussed delivery of services. We are already working in pockets with the resources we currently have, piloting areas such as: <ul style="list-style-type: none"> • The data from ratings of our online services leading to direct service improvements. • Discretionary Housing Payments (DHP) work under the LIFT pilot project leading to a more targeted distribution and take up of DHPs. • Proactive identification of issues leading to housing rent arrears using data from our housing system, resulting in better rent collection rates. • Demographic data being used to understand local issues in a more joined up way, such as identifying priorities of Community Partnerships. • Joining up data across services to provide a holistic view of performance. • Joining up data to provide an impact analysis such as making changes to waste or recycling collection and any subsequent impact on fly tipping, for example. • Our ambitions in using footfall and other data from digital towns implementation to boost the local economy and help us make informed choices around other services, such as parking.

3 How to address current situation

3.1	To provide focus, lead development and provide an area of expertise within the organisation, it is proposed to appoint a Senior Data Analyst to lead on the Data-led Services Programme, reporting to the Head of Digital and Programme Management, heading up a small team of Data Analysts (currently one FTE, however there are further data analyst posts being discussed and funded by other service areas, which will also sit within this team if they are agreed).
3.2	The responsibilities of this proposed post can be found at Appendix A. It is a specialist technical role to deliver the necessary data systems architecture, data

	quality requirements, specialist data analytical skills and lead on the programme of embedding a data-led culture across all services, delivering solutions to service areas to cater to their data needs, acting as a lynchpin for the organisation to enable better use of data in all front-line services.
3.3	<p>Creating the Data Analytics team provides a central resource in much the same way that all digital services are delivered to the authority, and will sit within the Digital & Programme Management service area alongside other technical teams such as:</p> <ul style="list-style-type: none"> • Business Systems team, enabling direct access to our data sources • Performance Reporting and Strategic Plan Management team • Corporate Project Management team

4 Reason/s for recommendation	
4.1	To address this currently under resourced area.
4.2	To ensure we maintain a modern and efficient working environment for East Suffolk Council, utilising all data available to us to improve services and meet the data needs of the organisation.

Appendices

Appendices:	
Appendix A	Senior Data Analyst Job Description

Background reference papers:		
Date	Type	Available From
Dec 2020	National Data Strategy	Link provided
May 2021	Research from DCMS – “Quantifying the UK Data Skills Gap”	Link provided
Feb 2022	Levelling up the United Kingdom	Link provided



Job Title:	Senior Data Analyst
Service Area:	Digital & Programme Management
Team:	Business Solutions
Salary:	Band 9 (subject to evaluation)

JOB DESCRIPTION

Main Purpose of Job:

To lead a team providing data analytics and reporting services delivering business insight and informing decision making across the whole organisation. To support the development of information business systems which best meet the Council's data management ambitions. To deliver directly against priority **P17 Effective Use of Data** within the strategic plan enabling East Suffolk to be a truly data-led authority.

Our Values:

You will be expected to work in line with our values which are:

Proud - Believing in who we are, what we do and where we live

Dynamic - Transforming the future with you in mind

Truthful - Honest and clear in all we do

Good Value - Delivering outstanding services, smartly & economically

United - Whoever we work with, we work as one team

Key Responsibilities:

1. To be responsible for the **day-to-day line management of Data Analyst(s)**, including recruitment, development, performance management and support. Including providing steer and mentoring as necessary in undertaking agreed data-led projects authority-wide.
2. **Develop and deliver data analytical services** and methodologies utilising the most appropriate techniques such as data mining, forecasting and modelling, which identify and predict trends and patterns in data and address key business challenges.
3. **Delivery of analytical products, reports, infographics, dashboards, presentations, numerical and statistical analysis**, using operational,

performance and strategic data presented in accessible ways to a wide audience including senior managers and members.

4. **Support development of system and data architecture** so that data management activities (classification, reporting, storage, archiving, retrieval, destruction) are in line with local and national information security and quality standards, policies and procedures.
5. **Lead the data-led services programme** involving a variety of corporate projects to ascertain the best use of data to inform business decisions and service delivery, including the development and specification of data-led business systems, to suit business needs and deliver to strategic plans.
6. Liaise with external suppliers, partner organisations and industry groups to **ensure data sharing opportunities are fully optimised, lawful and data systems are developed** to best practice.
7. Joining up and analysing data from multiple sources, both internal and external, to **enable the authority to be data-led in its decision making and operational management of services**, working with managers at all levels of the authority to provide insight to their services, working to the principles of our data-led services programme.
8. To undertake such other duties as may reasonably be required compatible with and/or arising from those listed above.
9. To promote and adhere to the workplace values of our organisation.

Line Manager:	Head of Digital and Programme Management
Responsible for:	Data Analyst(s)
Contacts:	All staff, suppliers/contractors, partners and other agencies, Members.

Political Restriction:

This post is not politically restricted.

Note: This is a description of the job as it is constituted at **February 2022** but, as the organisation develops, it may be necessary to vary the duties and responsibilities from time to time. It is the practice of the Council to periodically review Job Descriptions to ensure that they relate to the job as being performed or to incorporate whatever changes may be necessary. It is the Council's aim to reach agreement to such reasonable changes with the postholder but if agreement is not possible the Council reserves the right to insist on changes to the Job Description after consultation with the postholder.

PERSON SPECIFICATION

	Essential	Desirable
Knowledge and Experience	<ul style="list-style-type: none"> • An understanding of SQL and SSRS. • An understanding of data warehousing or other mass data storage methods • Data management. Understanding of data governance and how it works in relation to other organisational governance structures. Ability to participate in or deliver the assurance of a data service. • Proven IT and mathematical skills. Knowledge and experience in the application of IT and mathematics to produce solutions. • Project management skills. Knowledge and experience in the application of project management methodologies. • An understanding of Data Protection regulations. 	<ul style="list-style-type: none"> • Experience of leading a small team
Skills and Abilities:	<ul style="list-style-type: none"> • Analytical and problem-solving skills. A wide range of analysis and synthesis techniques and continual assurance, improving and innovating practices to generate clear and valuable findings. • Communication skills. Able to mediate between people and build relationships, communicating with stakeholders at all levels. Ability to manage stakeholder expectations and facilitate discussions across high risk and complexity or under constrained timescales. Able to speak on behalf of or represent the organisation to 	

	<p>audiences inside and outside of local government.</p> <ul style="list-style-type: none"> • Data modelling, data cleansing, and data enrichment skills. Production of data models and understanding of where to use different types of data models. Use of different tools and comparison between different data models. Ability to reverse-engineer a data model from a live system. Understanding of industry-recognised data-modelling patterns and standards. • Data visualisation. Ability to use the most appropriate medium to visualise data to tell compelling and actionable stories relevant for business goals. Ability to present, communicate and disseminate data appropriately and with high impact. • Logical and creative thinking skills. Ability to anticipate problems and know how to prevent them. An understanding of how problems fit into the larger picture. Ability to describe problems and help others to do the same. Build problem-solving capabilities in others. • Generation of ideas, methods, tools and leading or guiding others in best-practice use. • Quality assurance, validation and data linkage abilities. A deep understanding of relevant data sources, tools and systems. Use appropriate approaches for verifying and validating data and analysis. • The ability to influence senior stakeholders in data 	
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	<p>approaches and the ability to coach and mentor others.</p> <ul style="list-style-type: none"> • Statistical methods and data analysis skills. Understanding, mentoring and supervising a wide range of practices. Apply theory to practical situations. • Expertise in use of data modelling and reporting packages with ability to analyse large datasets • Advanced MS Excel (including Power Query), PowerBI, SQL Server, MS Access, MySQL or other RDMS • Excellent data visualisation and reporting skills • Strong verbal and written communication skills, able to create recommendations and reports for both technical and business audiences • An analytical mind and strong problem-solving skills • High level of literacy, numeracy, accuracy and attention to detail. • Ability to use and act on initiative. • Excellent interpersonal skills • Excellent organisational skills, able to prioritise work and meet deadlines • Critical analysis and logical decision-making skills. • Ability to challenge and improve current working practices. • Ability to help to transform the way we work. • Diplomacy, tact and negotiation skills. 	
Education and Training (including on-the-job training)	<ul style="list-style-type: none"> • Degree-level qualification in data analytics / statistics or related subject or equivalent relevant experience in this field 	<ul style="list-style-type: none"> • GIS related qualification or training • Appropriate qualifications/ training in use of analytical software and tools

Other Requirements:	<ul style="list-style-type: none"> • A commitment to own development and to supporting training and development initiatives. • Infrequent Travel – We positively encourage the use of technology to communicate and engage, but on occasions, there may be a requirement for you to travel using reasonable and suitable means available to you and agreed by the authority. • Flexible and willing to work outside of normal working hours if needed. • Promote positive communication across the organisation, encourage constructive relationships and transformation of the way we work. • A positive approach to change. • Committed to data quality. • Requirement to work across East Suffolk sites or remotely as appropriate. 	
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CABINET

Tuesday, 03 May 2022

Subject	Consultation on, and Revocation of Woodbridge Air Quality Management Area
Report by	Councillor James Mallinder, Cabinet Member with responsibility for the Environment
Supporting Officer	<p>Fiona Quinn Head of Environmental Services and Port Health Fiona.quinn@eastsuffolk.gov.uk 01394 444286</p> <p>Andrew Reynolds Environment Protection Manager andrew.reynolds@eastsuffolk.gov.uk 01502 523113</p>

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

Purpose and high-level overview

Purpose of Report:

To present information to Cabinet in order to determine whether to proceed with consultation on, and revocation of the Air Quality Management Area (AQMA)

Options:

To carry out public consultation with a view to revoking the Woodbridge Junction Air Quality Management Area (AQMA) Order as directed by the Department of Environment, Food and Rural Affairs (Defra).

To not consult and resolve to retain the AQMA, (contrary to UK policy, statutory guidance and Defra advice).

Recommendation/s:

1.1 That Cabinet approve commencement of formal consultation seeking views on revocation of the Woodbridge AQMA, following which Delegated Authority is given to Fiona Quinn (Head of Environmental Services and Port Health) in consultation with Councillor James Mallinder (Cabinet Member for the Environment) to consider consultation responses, liaise with Defra and approve the Revocation Order.

Corporate Impact Assessment

Governance:

Management of “Air Quality Management Areas” follows a process defined by specific and detailed Technical Guidance published by the Department for the Environment, Food and Rural Affairs (Defra). Part of that guidance requires participation of a “steering group” of stakeholders and interested parties, including relevant officers and elected ward members from all tiers of local government in the decision-making process. The Woodbridge AQMA steering group has been consulted on these proposals.

ESC policies and strategies that directly apply to the proposal:

Revocation of the AQMA specific to Woodbridge would mean East Suffolk Council’s Air Quality Strategy will become the main vehicle for setting-out the measures applied by East Suffolk Council to secure improvements in air quality in Woodbridge.

Environmental:

Fulfilling the Council’s statutory obligations with regard to Air Quality is referenced in the strategic plan, both in general terms and specifically in relation to the revocation of the Woodbridge AQMA. Being able to revoke an AQMA indicates that Air Quality has improved in the area covered by the AQMA. The report and appendices cover this in detail.

Equalities and Diversity:

There are no implications for equality and diversity and no mitigating actions required.

Financial:

There are no direct financial implications. If the Woodbridge AQMA is revoked, Air Quality monitoring will continue in the area as before for the foreseeable future.
Human Resources: There are no HR implications.
ICT: There are no ICT implications.
Legal: The detailed technical guidance published as part of the statutory framework of Local Air Quality Management requires that we revoke this AQMA.
Risk: Detailed studies of the evidence indicate revocation is a reasonable and appropriate course of action and advice from HM Government (Defra) is that revocation should proceed. There may be reputational risks associated with not pursuing revocation.

External Consultees:	The Department for Environment, Food and Rural Affairs (Defra) together with a Steering Group consisting of the following external consultees; Chief Executive Suffolk County Council, Senior Engineer Suffolk County Council, Health Protection Manager Suffolk County Council, Suffolk County ward councillor, Woodbridge Town Council ward councillor.
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>

P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected? Local Air Quality Management is an important statutory function of a District Tier Authority. The Woodbridge AQMA is identified as a specific project on the Strategic Plan. Revocation reflects the improvements in air quality secured over the lifetime of the AQMA, which contributes to the health, well-being and protection of residents and visitors to the District, creating a healthy and attractive environment for sustainable development and inward investment.			

Background and Justification for Recommendation

1 Background facts	
1.1	<p>Part IV of the Environment Act 1995 introduced the Local Air Quality Management regime that places a legal duty on local authorities to regularly review and assess air quality in their areas against Air Quality Strategy (AQS) objectives. The AQS objectives for England are set out in the Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002.</p> <p>Local authorities must declare an AQMA where any of the AQS objectives are exceeded and subsequently set out the measures they intend to put in place to secure compliance with the AQS objectives under an Air Quality Action Plan (AQAP). With effective implementation of the Action Plan and national policies aimed at reducing the emission of pollutants, it is expected that the air quality within AQMAs should improve to a point that concentrations will remain below the AQS objectives. A revocation of an AQMA can then be formally declared by Order under section 83 of the Environment Act.</p> <p>East Suffolk Council complies with this requirement in accordance with Technical Guidance (appendices) produced by the Department of Environment Food and Rural Affairs (Defra) and the resultant reports are published on the Council's Website.</p>

1.2	<p>Assessments undertaken in 2002 onwards, in accordance with the Defra technical guidance, indicated that the annual mean objective for nitrogen dioxide (NO₂) set at 40µg/m³ was being exceeded at 6 properties on the Western side of the Thoroughfare/Melton Hill arm of the junction with Lime Kiln Quay Road and St. John's Street in Woodbridge.</p> <p>As a consequence of this, Cabinet resolved to make the "Suffolk Coastal District Council Air Quality Management Area Order No.1, 2006" (Appendix A), which came into force on 3rd April 2006 (Report CAB 67/05 refers).</p>
1.3	<p>A required Further Assessment was produced in 2007 which confirmed the likely source of the NO₂ as local emissions from road vehicles. Extensive consultation with relevant stakeholders (the most significant being Suffolk County Council as Highways Authority) and the public was undertaken, and the final Woodbridge Junction Air Quality Action Plan (AQAP) was published in 2011 (Appendix B).</p> <p>The AQAP considered 79 options with 20 put forward for implementation. Microprocessor Optimised vehicle Actuation (MOVA) was installed on the traffic lights at the junction in 2011. This system works with sensors in the road to identify any arms of the junction with queueing traffic and allow increased green light timing for those arms. In this way the junction works to maximum efficiency. This measure helped with the extremes of queueing but did not provide the required reduction in NO₂ concentrations within the AQMA.</p> <p>Many other measures were investigated (from the AQAP and other suggestions) including a right-hand turning lane as you approach the junction from Melton Hill, installation of a mini-roundabout, restricting / moving car parking on Melton Hill, altering Thoroughfare traffic restrictions, weight restrictions for vehicles, school and business travel plans and tree planting.</p> <p>In 2014 & 2015 additional studies were undertaken to help advise on which measures Suffolk County Council should direct their funding towards. The studies included local meteorology investigations. The conclusions reached were that the junction layout on the Melton Hill arm close to the traffic lights is such that it creates a much lower wind speed than expected and the wind direction is slightly altered from the norm for this area. The studies suggest that vehicle emissions are therefore being 'funnelled' along Melton Hill away from the junction due to the unusual wind direction and then dispersed very slowly due to the low wind speeds and canyon like effect of the buildings on either side. The studies concluded that the Action Plan measures were unlikely to have any significant impact and needed updating; however, the evidence 'on the ground' began to show a decline to levels of NO₂ below the Air Quality Objectives.</p>

2 Current position	
2.1	NO ₂ concentrations within the AQMA have been reducing since 2006 and from 2014 have now been below the National AQS objective level of 40 µg/m ³ for seven consecutive years. Maximum annual average NO ₂ concentration for 2019 was 34µg/m ³ and 2020 was 25.2µg/m ³ . Please note that care must be taken when looking at 2020 figures due to the reduced traffic flows associated with the Covid-19 lockdowns. This has been considered carefully in the revocation assessment.
2.2	In response to our 2019 Annual Status Report on air quality for Defra, they recommended that we considered revocation of this AQMA. In response to our

	2020 Annual Status Report, Defra were firmer in their stance and advised that the revocation of this AQMA was now overdue.
2.3	<p>The revocation process necessitates an assessment to confirm that revocation is the correct course of action, and this must be approved by Defra. The revocation assessment must confirm that the National AQS objectives are now being met and that this is predicted to continue in the future.</p> <p>The revocation assessment (Appendix C) has been undertaken and sent to Defra within the ESC Annual Status Report 2021 (Appendix D) for their comments and confirm this.</p> <p>The assessment considers;</p> <ul style="list-style-type: none"> • national trends and policies surrounding NO₂ emissions concluding that the transition to ultra-low and zero emission vehicles presents the largest potential for future reductions in road traffic emissions within this AQMA. • regional factors such as the Local Plan, local planning policies, the Local Transport Plan and the ESC Air Quality Strategy. • local factors – the Development Consent Orders (DCOs) for Sizewell C, East Anglia ONE North and TWO Offshore Windfarms and re-development of the ex-District Council Office site at Melton Hill. <p>With regard to the local factors;</p> <ul style="list-style-type: none"> • the DCO's were assessed in detail, both individually and in-combination. No scenario was predicted to cause significant impacts within the Woodbridge AQMA. • The ex-District Council Office site gained planning consent in 2019, for which an air quality assessment was submitted and scrutinised by the Environmental Protection Team. The assessment indicated there would be fewer journeys through the AQMA with the proposed development in place than with the Council Offices in place. The Revocation Assessment concluded that there would be no significant negative implications for revocation of the AQMA.
2.4	The revocation assessment predicts future NO ₂ concentrations 5 years into the future within the AQMA, based on both 2019 and 2020 measurements. Using the 2019 dataset the highest predicted annual mean concentration of NO ₂ within the AQMA in 2025 is 24.5ug/m ³ – within the Air Quality Strategy objective of 40ug/m ³ .
2.5	<p>The revocation assessment concludes that there is confidence that the Woodbridge AQMA can be revoked and recommends that this should happen, in line with Defra requirements.</p> <p>The assessment has been sent to Defra and their comments are as follows; <i>'It is considered, given the scale of the AQMA and the evidence of consistent monitoring below the Air Quality Objective, prior to 2020, that sufficient evidence is presented to revoke the AQMA.</i> <i>Following the completion of this report, East Suffolk Council should proceed with the revocation of the AQMA no.1.'</i></p>

3 How to address current situation

3.1	It is considered by officers that all the technical evidence supports revocation, the next step being a full public consultation on our intention to revoke this AQMA. Consultation responses will be considered, and a final decision made, under the
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	<p>terms of delegated authority to the Head of Service, in consultation with the Cabinet Member for the Environment on Revocation of the Order.</p> <p>In the event Revocation is approved, Defra will be formally notified, details will be publicised on our Website and a press release prepared and issued.</p> <p>Statutory consultees as stipulated by Defra include Chief Executive Suffolk County Council, Senior Engineer, Suffolk County Council; Health Protection Manager, Suffolk County Council, and Local Constituency County, District and Town Councillors. The consultation is also open for public comment.</p>
3.2	<p>Air quality monitoring will continue at our current sites within Woodbridge, including the continuous analyser situated at the junction, for the foreseeable future to ensure that we are able to keep a close eye on this location and respond to any unexpected upwards trends in pollutants. This will be particularly important given the likely impact of developments in the area including DCOs (proposed and already consented) and major works to the A12 passing Woodbridge.</p> <p>The Council's recently published Air Quality Strategy will effectively supersede local action planning work in the event of revocation, ensuring continued air quality improvements beyond statutory designations.</p>

4 Reason/s for recommendation

4.1	Compliant with Statutory Technical Guidance and Defra advice; the next lawful and logical step to take.
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Appendices

Appendices:

Appendix A	The Suffolk Coastal District Council Air Quality Management Order No.1, 2006
Appendix B	Air Quality Action Plan for the Woodbridge Junction 2011
Appendix C	Woodbridge AQMA Revocation Assessment 2021
Appendix D	Advice from Defra on the proposed revocation of the "Suffolk Coastal District Council Air Quality Management Area Order No.1, 2006"

Background reference papers:

Date	Type	Available From
April 2016	LAQM.TG(16) – Defra Technical Guidance	https://laqm.defra.gov.uk/documents/LAQM-TG16-April-21-v1.pdf
April 2016	LAQM.PG(16) – Defra Policy Guidance	https://laqm.defra.gov.uk/documents/LAQM-PG16-April-16-v1.pdf

Environment Protection Act 1995, Part IV section 83(1)

Suffolk Coastal District Council

Air Quality Management Area Order

**THE SUFFOLK COASTAL DISTRICT COUNCIL AIR QUALITY MANAGEMENT
AREA ORDER NO 1, 2006**

Suffolk Coastal District Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order

This Order may be referred to as ‘**The Suffolk Coastal District Council Air Quality Management Area Order No 1, 2006**’, and shall come into effect on the **3rd April 2006**

The area shown on the attached map hatched in red is to be designated as an air quality management area (the designated area). **The designated area incorporates properties on the Western side of the Thoroughfare and Melton Hill arm of the junction with Lime Kiln Quay Road, in Woodbridge, Suffolk.**

The map may be viewed at the Council Offices, at Melton Hill, Woodbridge, between the hours of 08.45am to 5.15pm Mondays to Thursdays, and 08.45am to 4.45pm on Fridays.

This Area is designated in relation to a likely breach of the nitrogen dioxide (annual mean) objective as specified in the Air Quality Regulations (England)(Wales) 2000.

This order shall remain in force until it is varied or revoked by a subsequent order.

Dated; this Third day of March 2006

The Common Seal of Suffolk Coastal District Council was affixed in the presence of;

Ian S de Prez

.....

Authorised Officer

And

Simon Burridge

.....

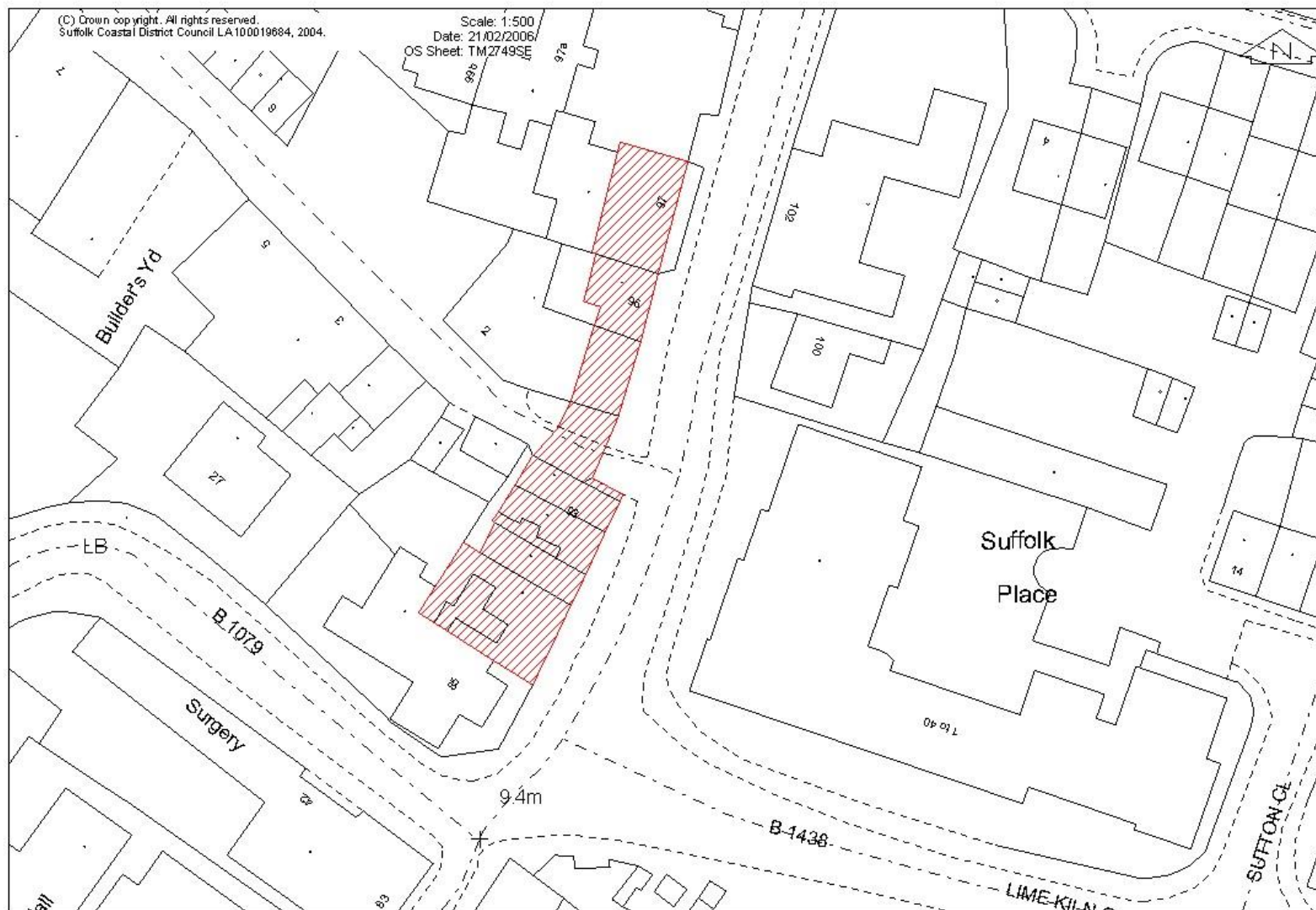
CS

9281

Authorised Officer

Dated 3rd March 2006

THE SUFFOLK COASTAL DISTRICT COUNCIL AIR QUALITY MANAGEMENT AREA ORDER NO 1, 2006





February 2011

Executive summary

The Environment Act 1995 requires all local authorities to review air quality within their districts. If it appears that any air quality “Objective” prescribed in the regulations and in the National Air Quality Strategy is not likely to be achieved then the local authority must designate the affected areas as Air Quality Management Areas (AQMAs). The Act then requires that an Action Plan be produced for any areas designated as AQMAs, setting out the actions that the District Council intend to take to achieve the air quality standards in the National Air Quality Strategy.

In 2006, Suffolk Coastal District Council, hereafter referred to as The District Council, declared an AQMA at the junction of Lime Kiln Quay Road, Thoroughfare and St John's Street in Woodbridge (hereafter referred to as the Woodbridge Junction) for expected traffic related exceedence of the nitrogen dioxide (NO₂) annual average objective. The District Council is working with the local highway authority, Suffolk County Council (hereafter referred to as the County Council), to help secure improvements to the network. The District Council has consulted widely with local organizations and the public in developing measures for inclusion in this Action Plan.

The Action Plan confirms the likely source of nitrogen dioxide is from transport and in particular from heavy goods vehicles. Evidence suggests that a 16% reduction in traffic emissions of oxides of nitrogen (or NO_x which is a precursor to NO₂) is necessary (based on 2006 figures) to achieve the air quality standard. The Action Plan considers 79 options to improve air quality and recommends 20 of these for implementation which are aimed at reducing levels of air pollution within the AQMA in Woodbridge. It also sets out the framework of partnership working with other organisations, within which the actions have been developed and will be progressed and monitored.

The plan aims to reduce transport emissions in the AQMA by around 10% by 2015. It is anticipated that a reduction of this scale will lead to the achievement of the annual mean NO₂ air quality standard (40µg/m³) at the Woodbridge junction in future years. No additional measures are thought to be required. However, it is acknowledged that the Action Plan is a continuously evolving document involving numerous groups and Authorities, which may require revision in the future.

It is acknowledged that Woodbridge is a market town with a need to balance the requirements of local businesses and community against improving local air quality. The actions and measures are anticipated to provide other benefits for Woodbridge and the District, which are beyond the original scope of the Action Plan. The benefits include:

- Reduction of other pollutants such as particulate matter, benzene etc
- Reduction in emission of green house gasses
- Reduced noise from traffic
- Reduced congestion
- Environmental improvements when schemes are undertaken
- Assist with climate change policies
- Improvements to human health

In compiling this Action Plan, Government Guidance LAQM.PG (09) and the Review and Assessment reports produced by the District Council have been referred to.

Suffolk Coastal District Council Air Quality Action Plan

The Action Plan has undergone a full statutory and public consultation and has been amended accordingly, a summary of the main alterations are included at the start of the Plan. A number of additional measures are under-going further investigation for possible future inclusion in the Action Plan following the consultation.

When this Action Plan has been formally adopted by the District Council work can begin on the measures included. Annual updates will be provided in the form of an Action Plan Progress Report, as required by Defra. Over time, should the measures chosen prove not to be fully successful in reduction of nitrogen dioxide concentrations in the AQMA, other measures available will be reassessed.

For further information concerning this report, please contact:

Environmental Protection, Suffolk Coastal District Council, Melton Hill, Woodbridge, Suffolk IP12 1AU

Telephone: (01394) 444624 Fax: 01394 444354

Email: environmental.protection@suffolkcoastal.gov.uk

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Appendices

Appendix 1	UK air quality standards and objectives
Appendix 2	AQMA Order for the Woodbridge Junction within the Suffolk Coastal District
Appendix 3	Maps of Further Assessment of air quality at the Woodbridge Junction AQMA
Appendix 4	Assessment Methods
Appendix 5	Assessment Results and details of the draft Action Plan measures

Changes made to the draft Action Plan

A number of notable changes, together with minor re-wording, have been made to the draft Action Plan in order to produce this final Action Plan document. Changes have come about due to additional information obtained by members of the Steering Group, including a further year of monitoring data at the junction, together with results of the statutory and public consultation exercise undertaken on the draft document. The notable changes are summarised below:

- **Section 1 – Introduction** – Figure 1.2 has been updated from 2006 data to show 2009 data.
- **Section 2.4 – Recent trends in air quality** – this section has been updated to include the 2009 monitoring data and additional comments on trends shown.
- **Section 3.5 – Consultation responses to the draft Action Plan** - this section now details and discusses fully the results of the statutory and public consultation undertaken on the draft Action Plan.
- **Section 3.6 – Measures to improve air quality - Measure 3 (pedestrianise the Thoroughfare / increase the restrictions to 8am-6pm)**. This has been re-worded and the description expanded upon to better reflect its meaning. The measure now reads 'Extension of restrictions to Thoroughfare (8am – 6pm)'.

Suffolk County Council advised that pedestrianisation of the Thoroughfare is not a viable option due to the need for access by residents and businesses for delivery purposes during the day. Extending the hours of the current access restrictions is possible and investigations will be undertaken (should Measures 1 and 2 be unfeasible or unsuccessful) to determine whether this option is viable. These investigations will include consulting local businesses, residents and interested parties to determine the viability of this measure.

- **Section 3.6 – Measures to improve air quality - Measure 4 (remove the ability to turn right or go straight on from the direction of Melton Hill)**. This has been altered following further investigations by Suffolk County Council. The measure now reads 'Remove the ability to turn right from the direction of Melton Hill'.

Suffolk County Council has considered this option further and determined that banning the straight on manoeuvre would impact on operation of the Thoroughfare. Traffic would have to reroute and travel along Lime Kiln Quay Road to enter, increasing traffic coming from this direction, or the traffic flow in the Thoroughfare would have to be reversed. If the flow were reversed the traffic lights would have to accommodate an additional phase to allow traffic to exit onto the junction, potentially increasing congestion on the other arms. Reversing the flow could also lead to additional traffic using the Thoroughfare from the Cumberland Street direction as a cut through. Traffic waiting in the Thoroughfare at the lights could cause a new air quality concern as the Thoroughfare is a street canyon and as such any emissions would be difficult to disperse and could lead to exceedance of the objectives. As such, this option is not considered viable at this time.

Removing the ability to turn right on its own will not have as much of an impact on congestion as the original measure. However, alongside a possible straight on queuing lane on Melton Hill (Measure 2) and increased access restrictions in the Thoroughfare (Measure 3), if they were to be implemented, it could have an impact

and help to improve traffic flow on Melton Hill. This suggestion also has its potential problems as it may impact on the amount of traffic using Sun Lane which would need to be investigated. As above, these investigations will include consulting local businesses, residents and interested parties to determine the viability of this measure.

- **Section 3.6 – Measures to improve air quality – Recommendation for Measures 5 and 6 (relocation / removal of parking on Melton Hill).** Following the results of the public consultation, it has been noted that there is strong local resident objection to both measures and this will be taken into account when assessing these two options.
- **Section 3.6 – Measures to improve air quality – Recommendation for Package of Measures 3: Direction signing).** The public consultation process has shown strong support for additional measures to be included relating to reducing the volume of through traffic on this route, which includes several ideas relating to Direction Signing. Additional investigation is currently being undertaken to determine the percentage of through traffic and additional measures will be considered following the outcome.
- **Section 3.6 – Measures to improve air quality – Table 3 Summary of Action Plan Measures.** Information has been removed from this table and is now presented in Section 4 – Implementation Plan.
- **Section 4 – Implementation Plan.** This section has been significantly altered to include Implementation details and timetables for all 20 measures presented in the Action Plan.

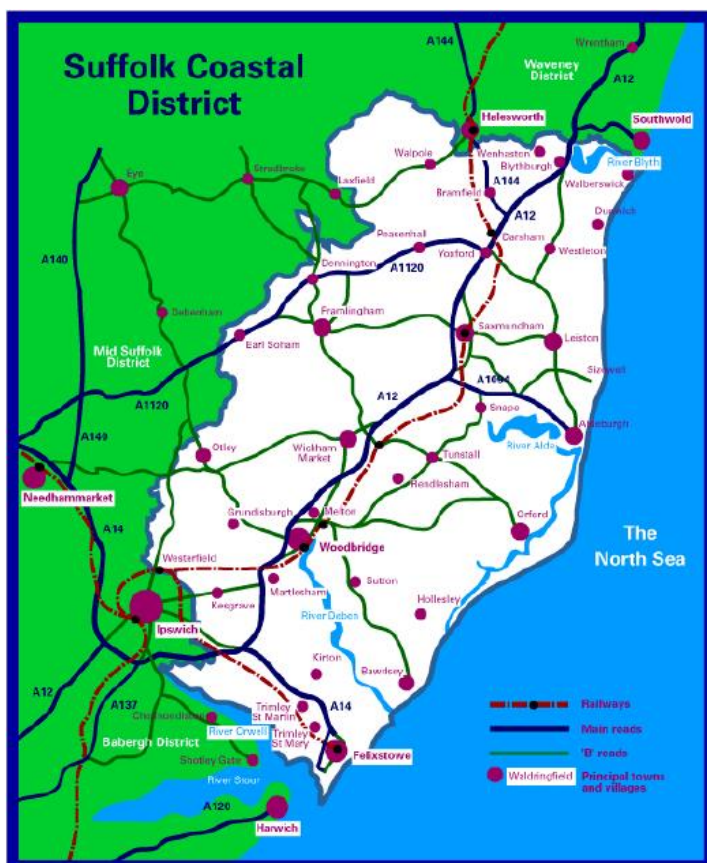
1 Introduction

This local Air Quality Action Plan sets out a work programme to improve air quality at the Woodbridge Junction by the District Council in partnership with the County Council. The District Council has consulted the public and other statutory consultees in order to produce this final plan. The District Council will obtain approval for this Action Plan from central Government and both Councils before it is implemented.

Suffolk Coastal is a diverse district incorporating thirty miles of coast, expansive areas of countryside, much of which still forms a working landscape, five market towns including Woodbridge, the resort and port of Felixstowe as well as many villages (Figure 1.1).

The excellent quality of our environment is recognised in the substantial areas of countryside and coast that are designated as Areas of Outstanding Natural Beauty. Our built environment is of a similar high quality, with numerous listed buildings, Conservation Areas and Scheduled Ancient Monuments. Our coast and estuaries support vibrant communities, a wealth of outstanding landscapes and are internationally significant for the wildlife they support.

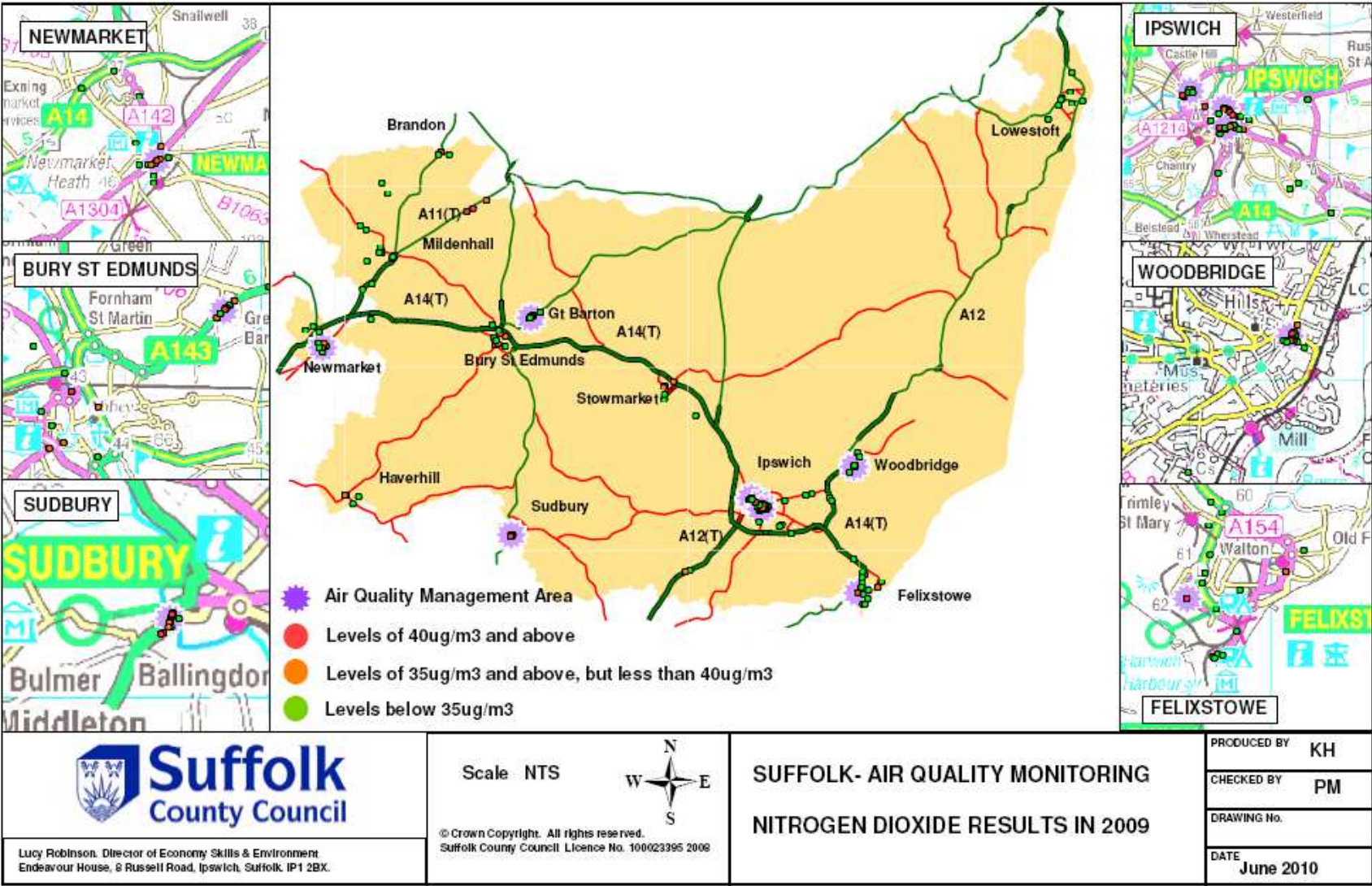
Figure 1.1 **Suffolk Coastal District Council**



The district supports over 4,000 businesses, including large employers like the Port of Felixstowe, BT and Sizewell Power Station, as well as a high proportion of small and medium sized businesses that are vital to the local economy. Tourism is also a major driver for the local economy. Much of the district is within the Haven Gateway that is identified for significant growth.

While the quality of our air is generally very good and well within the limits set by Government for the protection of human health, there are now two areas within the district where levels of pollution give rise for concern. Two Air Quality Management Areas have, therefore, been declared in the District, one in Woodbridge and the other in Felixstowe both for annual mean nitrogen dioxide. The District has a statutory duty to develop an Action Plan to improve air quality in these locations. Other areas within the county also exceed the annual mean nitrogen dioxide limit ($40\mu\text{gm}^3$), these locations are shown in Figure 1.2 overleaf.

Figure 1.2 Nitrogen dioxide concentrations recorded in Suffolk in 2009



2 Air Quality in Suffolk Coastal

This chapter sets out local authority duties in relation to Local Air Quality Management. These are the tasks that the District Council must complete as a statutory duty.

2.1 Health effects of poor air quality

There are various sources of air pollution in the UK. These can include transport (mainly road transport), energy – both use and production, commercial / industrial premises and natural sources. The Government has identified 8 key pollutants:

- Nitrogen Dioxide
- PM₁₀ particulates
- Benzene
- 1,3 – butadiene
- Lead
- Sulphur Dioxide
- Carbon Monoxide
- Ozone

Whilst this Action Plan is primarily aimed at reducing NO₂, the initiatives within it will have a positive effect on the reduction of other air pollutants, especially particulates. The health implications of the three main transport emissions types are as follows:

Nitrogen Oxides (NO_x) Road transport is responsible for approximately 50% of the emissions of NO₂ in Britain. NO₂ has been identified as having various adverse health effects particularly on the respiratory system and in both asthmatics and non-asthmatics. Short term exposure to this pollutant can increase the likelihood of reaction to allergens such as pollen and has been known to increase asthma in some people. Children exposed to this pollutant may have increased risk of respiratory infections.

Particulates (PM₁₀) Particulates can be produced directly from combustion and other processes, as well as from natural activities. They can also be caused by chemical reaction in the air. Particulates of less than 3 microns can pass deep into the lungs thus causing respiratory problems.

Carbon Monoxide (CO) Carbon monoxide is a colourless, tasteless gas, which is known to be poisonous when incomplete combustion occurs. Inhaling small doses of this gas can result in a person becoming confused and having reduced co-ordination. It can also increase the likelihood of angina.

Principal Sources of Air Pollution in the District Nitrogen dioxide (NO₂) and nitric oxide (NO) are collectively known as Nitrogen Oxides (NO_x). Nitrogen Oxides, which are the main source of poor air quality, are produced during all combustion processes in air, usually in the form of NO which subsequently reacts with ozone (O₃) to form NO₂. The predominant source of NO_x in Britain is road transport and it is thought that half of emissions in Europe originate from this source; certainly the highest concentrations of NO₂ are generally found close to busy roads in urban areas. NO₂ pollution levels within the District follow a similar pattern with the majority of NO_x emissions being road transport related. Commercial, industrial and domestic sources also make a small contribution to background. NO_x emissions close to the Port of Felixstowe arise from a number of commercial and transport related sources.

In the UK, air pollution is currently estimated to reduce the life expectancy of every person by an average of 7-8 months with estimated equivalent health costs of up to £20 billion each year. Air pollution also has a detrimental effect on our ecosystems and vegetation. Clearly there are significant benefits to be gained from further improvements.

To protect the health of the population, the Government have set out a national air quality strategy which includes statutory objectives (standards) for some key pollutants. The objectives are expressed as a maximum ambient concentration not to be exceeded, either without exception or with a permitted number of exceedences within a specified timescale (see Appendix 1). The objectives have been set throughout the UK and European Union at levels that aim to protect the vulnerable in society from the harmful effects of breathing pollution.

In response, a number of measures have been introduced at an international level (including the UK) to reduce this impact. They include:

- Incremental reductions in emissions from vehicles and industry
- Climate change programme policies
- Local Air Quality Management (see following section)

The UK government recognises the important role that local authorities have and continue to play in helping deliver the air quality objectives. “Action taken at the local level can be an effective way of tackling localised air quality problems leading to an overall improvement of air quality.”

2.2 The legislative framework for air quality

Local Air Quality Management

The Environment Act 1995 gives local authorities duties and responsibilities that are designed to secure improvements in air quality, particularly at the local level. These include the review and assessment of key pollutants in their area in a series of rounds every three years. If it appears that any of the air quality objectives set by government are not likely to be achieved and members of the public are being exposed to the pollution, the local authority must by order designate any part of its area so affected, as an Air Quality Management Area (AQMA). They must then prepare and implement a remedial Action Plan of measures to reduce air pollution levels in that AQMA. A Review and Assessment round consists of local authorities initially undertaking an Updating and Screening Assessment (USA) and then carrying out the following stages if any objectives are found to be exceeded:

- Detailed Assessment of those areas identified in the USA as potential AQMA's
- Designation of AQMA
- Further Assessment of air pollution in the AQMA
- Amendment if necessary of AQMA boundaries
- Action Plan
- Annual Action Plan Progress Reports

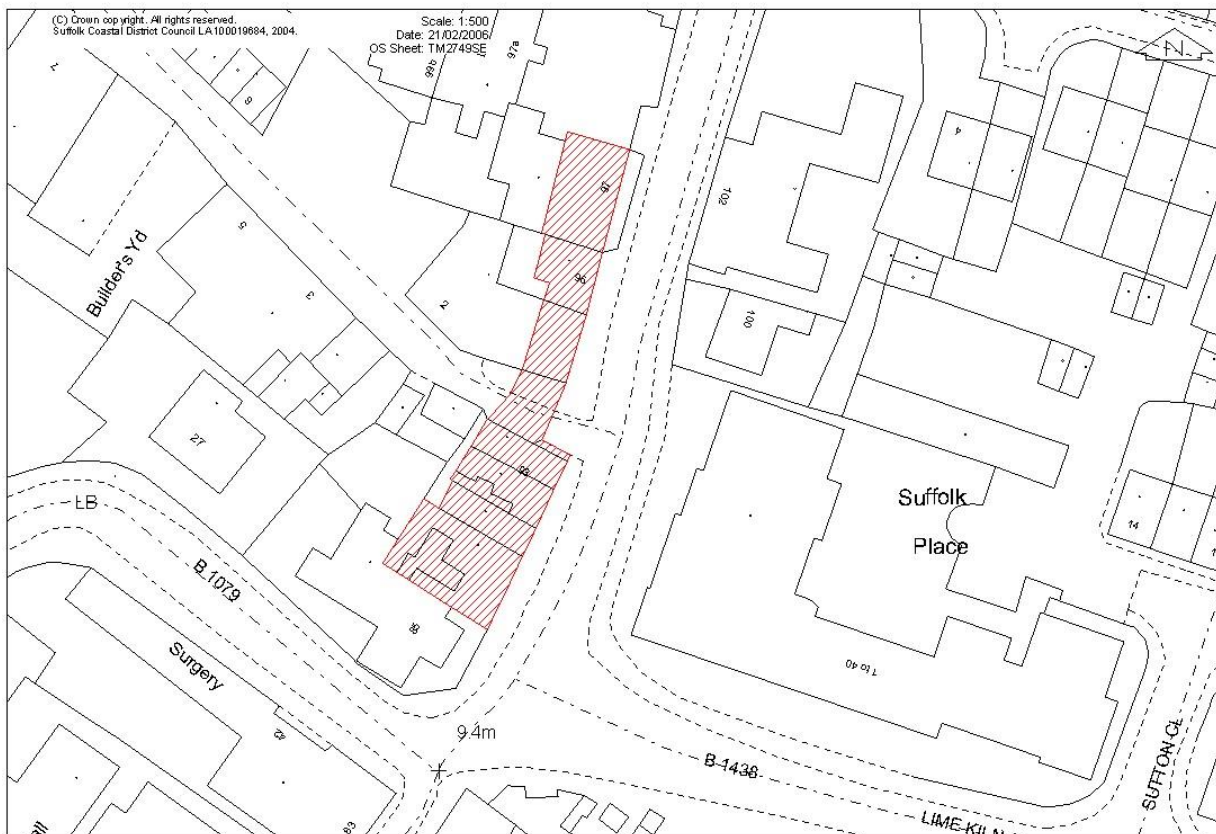
The fourth round of Review and Assessment commenced in 2009. The District Council has currently designated two AQMA's, one in Woodbridge and the other more recently declared in Felixstowe. The Woodbridge AQMA is the subject of this Action Plan. The Action Plan for the Felixstowe area will be developed separately.

2.3 Conclusions of previous review and assessment of air quality in Suffolk Coastal

The District Council has completed its Local Air Quality Management duties in compliance with the government guidance. The bulk of work to date has been to review air quality in the district and to assess whether any problems with achieving the health based air quality objectives exist now or are predicted for the future. This section provides a summary of this work.

Initial assessment of air quality began in 1999, but it was not until 2003 that the Woodbridge Junction was highlighted as a potential area where the annual average nitrogen dioxide objective could be exceeded. This exceedence was confirmed in 2004 and further monitoring was carried out at the junction. This work culminated in the declaration of the AQMA at the Woodbridge Junction in March 2006. The area designated can be seen in Figure 2.1, it covers a number of properties on the Western side of the Thoroughfare / Melton Hill arm of the Woodbridge Junction. A full copy of the Air Quality Management Area Order made for the Woodbridge Junction is attached in Appendix 2.

Figure 2.1 Map showing the Air Quality Management Area at the Woodbridge junction, Woodbridge, Suffolk



Figures 2.2 to 2.4, which follow, show queuing traffic on the three main arms of the junction, demonstrating the traffic related problems experienced. The phasing of the traffic lights includes time for pedestrians to cross (a necessity at this junction), which will increase queuing time for traffic.

Figure 2.2 The Thoroughfare / Melton Hill arm of the Woodbridge Junction, where the Air Quality Management Area is located



Figure 2.3 The Lime Kiln Quay Road arm of the Woodbridge Junction



Figure 2.4 The St John's Street arm of the Woodbridge Junction



Summary of Further Assessment for the Woodbridge Junction (October 2007)

In the AQMA the exceedence has been identified as being mainly attributable to traffic pollution. There are no other significant sources within the locality of the junction and as such traffic is identified as being the main source and should be the focus of any work done to remediate the problem in the AQMA.

As part of the Further Assessment, the air quality impact from road traffic emissions on nitrogen dioxide concentrations at receptor locations was predicted using an air dispersion computer model.

The results of the modelling were presented as contour maps and can be seen in Appendix 3. The modelled contour maps show a predicted exceedance of the annual mean NO₂ air quality objective (40µg/m³) at two properties on the Western side of the Thoroughfare / Melton Hill arm of the junction in 2006, the highest exceedance predicted at 43.5µg/m³. The Further Assessment therefore found that it was probable that the annual mean NO₂ objective was exceeded at Woodbridge junction during 2006. Furthermore it was possible that the same objective would be exceeded during 2010 when the UK aims to have eliminated such exceedences.

The model does not predict exceedances for all receptor locations situated within the designated AQMA even though diffusion tube monitoring being undertaken at those locations shows concentrations above 40µg/m³. The model also predicts marginal exceedances of the annual mean objective at receptor locations on the Eastern side of the Thoroughfare / Melton Hill and in Lime Kiln Quay Road. Diffusion tube monitoring at these locations does not show any exceedances of the objectives. Due to the diffusion tube results, the Further Assessment concluded that the boundary of the AQMA be retained.

The aim of an air quality Action Plan in Woodbridge would be to take action to make progress towards the annual average NO₂ objective of 40µg/m³.

Figure 2.5 and Table 1 below show the average source apportionment of NO_x at the Woodbridge Junction. Proportionally, emissions from light duty vehicles (LDV) are the same as those from heavy duty vehicles (HDV). However, stationary traffic (including both LDV and HDV) emissions are twice those from moving traffic, with the highest proportion being emitted from stationary HDV.

Figure 2.5 NO_x emissions by source at the Woodbridge Junction

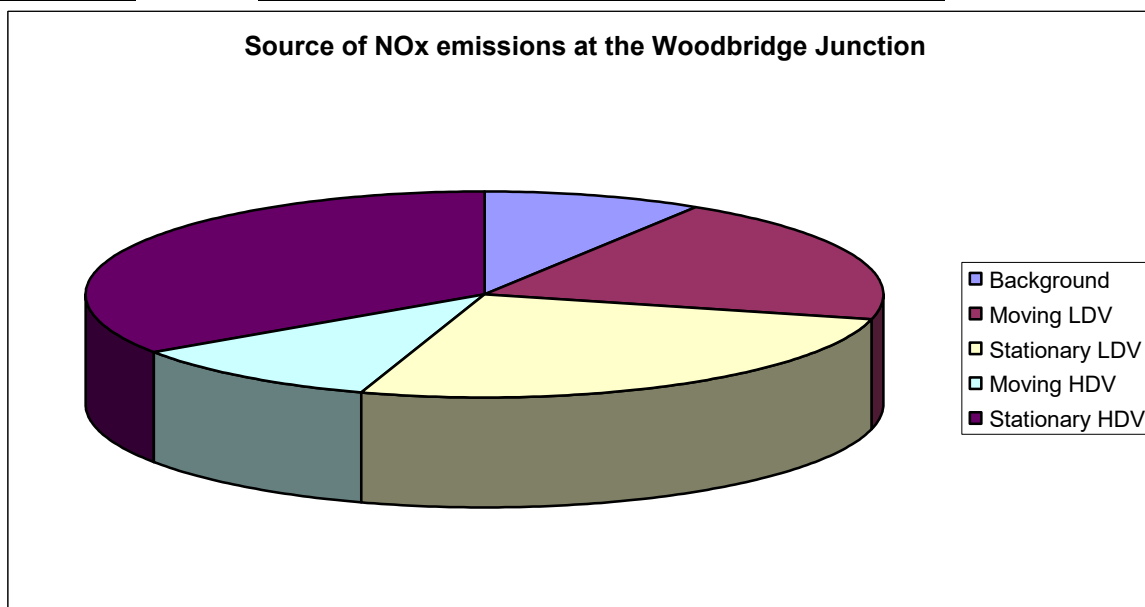


Table 1: Key results from source apportionment study

Site	Estimated background contribution to annual mean NO _x (%)	Estimated traffic contribution to annual mean NO _x (%)	Reduction in NO _x from traffic required to meet objective (%)	LDV contribution to moving traffic NO _x emissions (%)	HDV contribution to moving traffic NO _x emissions (%)	LDV contribution to queuing traffic NO _x emissions (%)	HDV contribution to queuing traffic NO _x emissions (%)
Thoroughfare/Melton Hill	9	91	16	21	11	26	33

LDV = light duty vehicles (cars and light goods) HDV = heavy duty vehicles (heavy goods and buses)

Table 1 confirms that road transport is the dominant contributor to local pollutant concentrations at the Woodbridge Junction. Based on the figures obtained from the Further Assessment modeling, that the annual mean NO₂ concentration in 2006 at a receptor on Thoroughfare/Melton Hill was estimated to be 43.5 µg/m³, it is estimated that a 16% reduction in road traffic emissions of NO_x (or nitrogen oxides, a pre-cursor of NO₂¹) at the junction would be necessary to achieve the AQ objective of 40 µg/m³ in 2006.

Table 2 overleaf shows the traffic make-up at the Woodbridge Junction. Heavy goods vehicles and buses together (heavy duty vehicles) constitute less than 5% of the traffic flow

¹ The relationship between oxides of nitrogen (NO_x) and one of its components, nitrogen dioxide (NO₂) is complex and non-linear. Essentially a greater than proportionate reduction in NO_x is required to achieve a given percentage reduction in NO₂. For example, if a 10% reduction in NO₂ concentration is needed at a given location, the local emissions of NO_x must be reduced by more than 10% in order to achieve this.

through the junction, yet Table 1 highlighted that these vehicles contribute 44% of the local transport emissions at the junction.

Table 2: Key results from traffic study

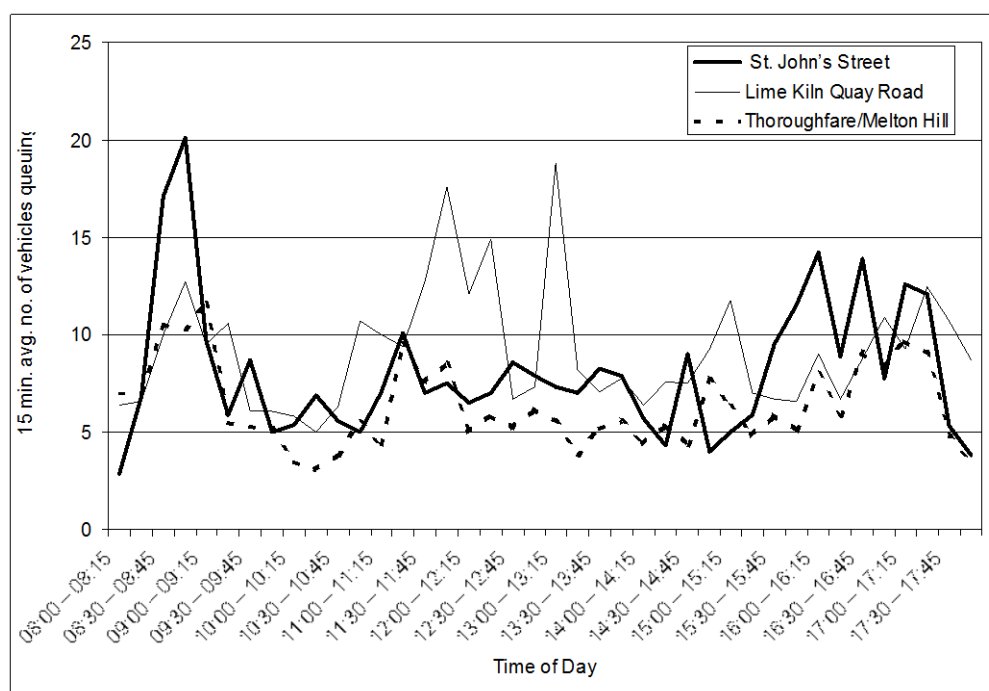
Site	Contribution of cars to flow rate (%)	Contribution of LGVs to flow rate (%)	Contribution of HGVs to flow rate (%)	Contribution of buses to flow rate (%)
Thoroughfare / Melton Hill	87	10	1.5	1.5

LGV = light goods vehicles HGV = heavy goods vehicles

Flow rate = from 11-hour traffic survey undertaken on 24th November 2005.

On 23 November 2005 a manual count of traffic queue lengths was undertaken at the Woodbridge Junction for the three main arms. Figure 2.6 below shows the results from this one day survey broken down into 15 minute averages. If this single day survey can be taken as representative of weekday traffic, these data indicate that queuing is heaviest during the morning and evening traffic peaks on all three arms of the junction. There also may be a peak in traffic using Lime Kiln Quay Road in the middle of the day. Traffic queues on Thoroughfare / Melton Hill (where the AQMA is situated) are much lower than on the other three arms of the junction and show peaks at 11:00-12:00 and 15:00-15:30 in addition to the morning and evening peaks.

Figure 2.6 15-minute average number of vehicles queuing at Woodbridge Junction on Wednesday 23rd November, 2005



The results of the Further Assessment in Woodbridge indicate the following:

- Road traffic on Woodbridge Junction is the dominant local contributor to annual mean NO₂ concentration (90% of the total).
- Traffic queues of greater than 10 vehicles at the junction may be the norm during weekday morning and evening traffic peaks on all three arms of the junction. Queues in excess of 15 vehicles are evident during the lunch hour break in Lime Kiln Quay Road.
- Although the queues involve few vehicles, emissions while queuing contribute around 60% to local concentrations. Moving traffic (around 4000-5000 vehicles per day) contributes around 30% to local concentrations
- The remaining 10% of local concentrations comes from regional sources unassociated with traffic at Woodbridge junction.
- Heavy-duty vehicles contribute around 44% toward local concentrations although they comprise only 3-4% of traffic flows. Heavy-duty vehicles are evenly split in number between goods vehicles and buses.
- Based on 2006 figures a 16% reduction in traffic NO_x emissions at Woodbridge Junction would be required to achieve the annual mean air quality standard for NO₂. If this standard is achieved then the AQMA order could be removed.

2.4 Recent trends in air quality in Woodbridge

NO₂ levels have been monitored in Suffolk Coastal since 1993 using diffusion tubes, however most of the original sites have now been relocated or removed. Prior to 2002, data was corrected for laboratory bias using the correction factor provided by the laboratory. Since 2002, the bias correction factor has been calculated from collocation studies undertaken within the Suffolk Coastal District. From 2004 onwards the collocation study has been undertaken at the Woodbridge Junction itself. For this reason, monitoring data has only been presented from 2002 onwards for the purpose of obtaining information on air quality trends. Figure 2.7 overleaf shows the locations of the current monitoring sites at the Woodbridge Junction.

An automatic analyzer is also located at 93 Thoroughfare in order to gain measurements at the predicted maximum location, see figures 2.7 and 2.8 for location. Annual average results recorded by the analyser 2006-2009 are shown below. The air quality objective is 40µg/m³.

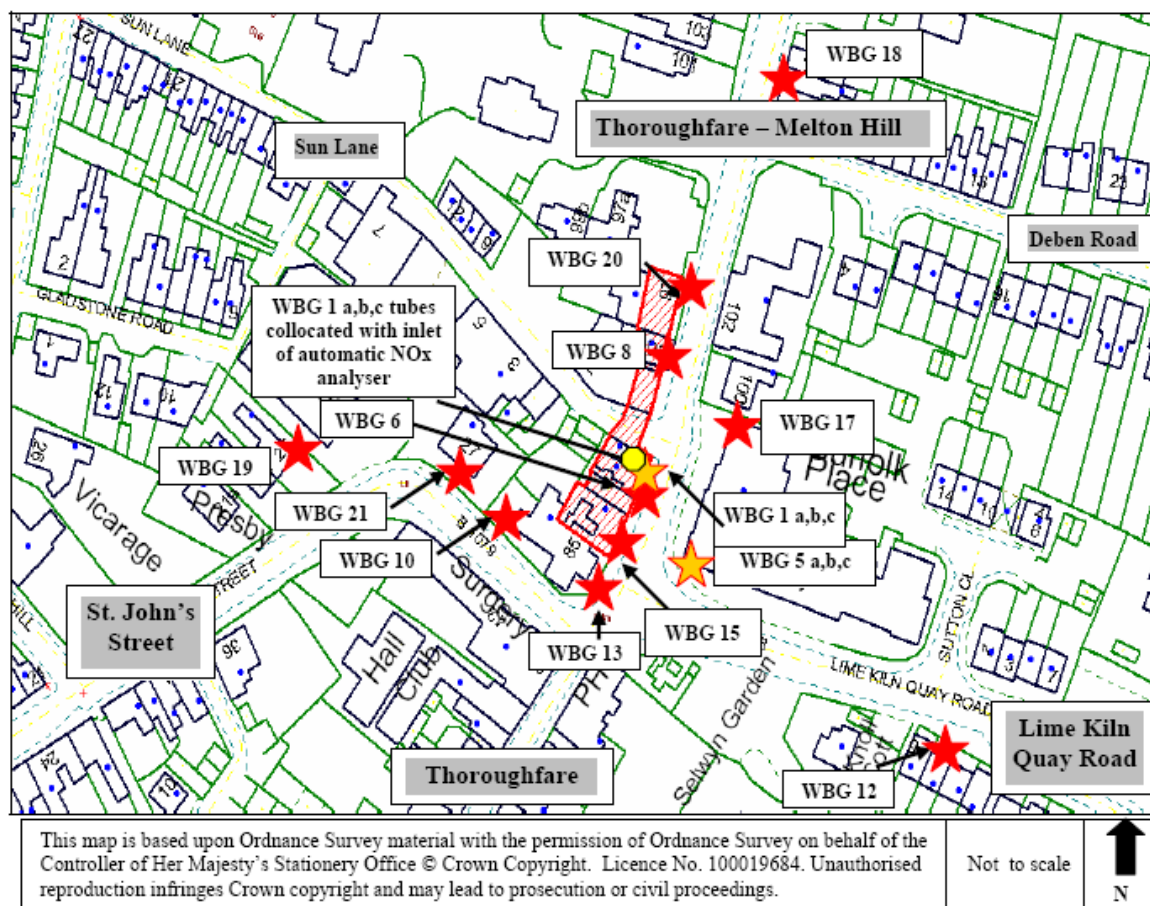
Year	Annual average NO ₂ (µg/m ³)
2006	44
2007	46
2008	45
2009	45

The graph in figure 2.9 shows the annual average concentration of NO₂ recorded at all sites in Woodbridge (2002 – 2009) which are still currently in place. A number of the current diffusion tube sites are in place for short-term assessment of locations of concern and are not relevant for the purpose of obtaining trend information but have still been included in this graph for completeness.

Predicted background concentrations were expected to decrease over the past years and to continue to decrease into the future, as the national vehicle fleet gradually improved and other national policies to reduce emissions took effect. However, this expected decrease over the past 5 years has not been seen in Woodbridge, which is a trend realized at many locations in the UK. It is now known that with the introduction of particulate traps to reduce particle emissions on Heavy Goods Vehicles, a rise in direct NO₂ emissions has occurred potentially leading to increased NO₂ concentrations at nearby receptors. In Woodbridge, other local factors may be playing a part in the continued levels above the objective, which is investigated within this Action Plan.

The graph in figure 2.9 shows that concentrations at all diffusion tube sites have been fairly stable but with a general decrease seen in the last 2-3 years which could mean that the national policies are possibly slowly beginning to now have an effect. NO₂ levels recorded by the continuous analyser do not really show a significant decrease but they do seem to have stabilised in the last 3 years.

Figure 2.7 Map showing the location of the air quality monitors located at the Woodbridge Junction which measure the NO₂ ambient concentrations



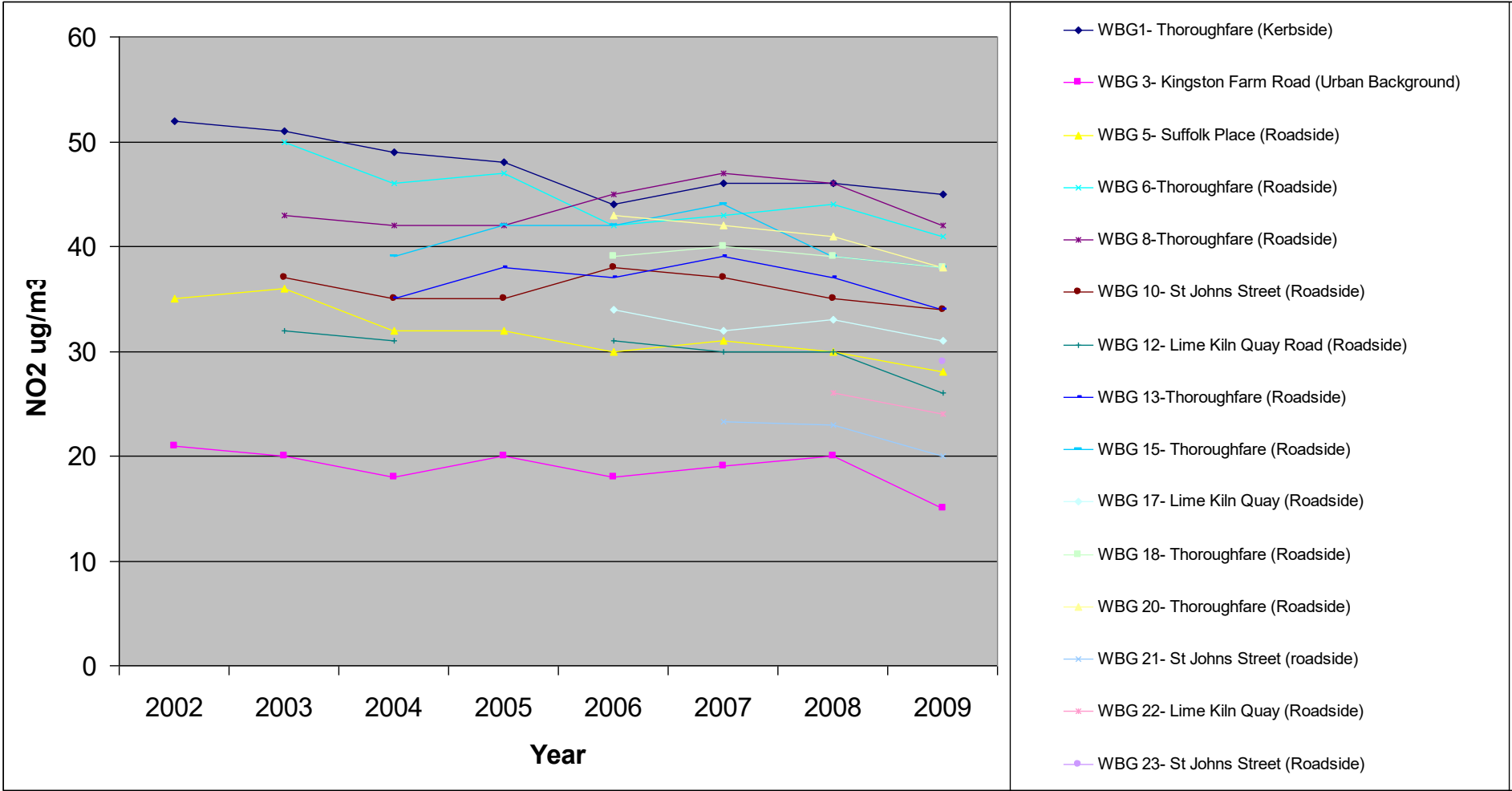
- ★ Single Diffusion Tube
- Site of automatic NO_x analyser
- ★ Triplicate Diffusion Site
- AQMA

Figure 2.8 **Location of the automatic analyzer inlet for the measurement of ambient NO₂ concentrations on Thoroughfare / Melton Hill at the Woodbridge Junction**



Automatic
analyser inlet for
the
measurement of
NO₂
concentrations

Figure 2.9 Annual average diffusion tube results (NO₂) in Woodbridge



2.5 Conclusions

1. The Woodbridge Junction has a problem with local NO_x emissions causing levels of NO₂ to be above the health-based annual mean standard of 40µg/m³. Road transport on the Woodbridge Junction is the dominant local source of NO_x emissions. Therefore it is intended that this Action Plan will be integrated into the Suffolk Local Transport Plan (LTP).
2. Based on the source apportionment analysis, options to reduce traffic emissions should firstly focus on reducing traffic queuing times at the junction.
3. This may solve the air quality problem but if not then additional options that focus on heavy-duty vehicle emissions may also be considered.
4. Based on 2006 values, these measures would need to reduce traffic NO_x emissions at the Woodbridge Junction by up to 16% to achieve the air quality standard.
5. Although this Action Plan will focus on making progress towards achieving the annual mean objective for NO₂, it will have additional value for the Suffolk Coastal District community if it also addresses other objectives relating to traffic emissions including: reducing exposure to fine particulate matter (PM₁₀ for human health benefits) and reducing emissions of carbon dioxide (CO₂) as part of efforts to mitigate human-influenced climate change.

These conclusions will be referred to throughout the process of developing the Action Plan.

3 Development of the Action Plan

The Action Plan must include:

- Quantification of the source contributions to the predicted exceedences of the objectives; this will allow the Action Plan measures to be effectively targeted.
- Evidence that all available options have been considered on the grounds of cost-effectiveness and feasibility
- How the local authority will use its powers and also work in conjunction with other organisations in pursuit of the air quality objectives
- Clear timescales in which the District Council and other organisations and agencies propose to implement the measures within the plan
- Quantification of the expected impacts of the proposed measures and where possible an indication as to whether the measures will be sufficient to meet the air quality objectives and
- How the local authority intends to fund, monitor and evaluate the effectiveness of the plan.

Once the Action Plan is adopted, the District Council will also report progress on the implementation of the Action Plan annually and revise it from time to time depending on circumstances.

3.1 Partnership between the District Council and the Local Transport Authority (the County Council)

In Suffolk, the County Council is responsible for overall transport strategy. As the AQMA in Woodbridge is dominated by emissions from transport, a partnership arrangement between the District and County Councils for the development of this Action Plan has been used. The County Council has determined proposed actions which they themselves can implement in pursuit of the air quality objectives.

Integration with Local Transport Plan (LTP)

The Local Transport Plan system is a 5-year transport strategy at a local level whereby Local Transport Authorities are required to submit a 5-year Local Transport Plan (LTP) for their area that sets objectives and targets for transport, and strategies for achieving them. The plans must cover all forms of transport and establish strategies to tackle congestion and poor air quality. The LTP provides the basis for allocating resources to the Local Transport Authority in order for them to implement their plans. The Local Transport Authority for Suffolk is the County Council.

The Department for Transport (Dft) has included air quality as one of four new shared priority areas to be reported in the Second Local Transport Plan (LTP2) which covers the period from 2006 to 2011. This is the first time that air quality has been addressed separately as a priority alongside three other areas which are congestion, accessibility and road safety. The County Council's Plan was completed early in 2006 and is available for inspection at <http://www.suffolk.gov.uk/TransportAndStreets/Policies/SuffolkLocalTransportPlan2006-2011.htm>

A full report on Suffolk's air quality, including reference to the Woodbridge Air Quality Management Area declared in April 2006, has been included in Chapter 8 of the LTP2 together with the County Council's objectives of:

- a) To comply with the requirements of the National Air Quality Strategy and
- b) To seek to maintain and where possible improve air quality in Suffolk.

The LTP has set the following policy aims and targets to help improve air quality:

LTP8 Air Quality in Air Quality Management Areas Target pollutant concentrations within individual air quality management areas. Intermediate outcomes can be transport emissions, vehicle mileage or traffic flows in the air quality management areas.

Local Indicator L2: Percentage of people travelling to work by sustainable means.

Green travel planning will be an important intervention, in which the County Council will work with businesses in the larger towns to help reduce congestion and also to encourage healthier travel modes. A baseline of 27.8% of businesses had a green travel plan in place in 2005/6 which had increased to 34.2% in 2007/8.

BV102 Public transport patronage including other public transport modes like community services. A baseline in 2003/4 was 17.5m passengers and the target for 2010/11 is 20.25m. During 2007/8 public transport patronage was 20.18m and therefore is well on target.

BV104 Bus satisfaction Sample survey every 3 years. Baseline 2003/04 54% top quartile. The target is 56% of all respondents satisfied with local bus services by 2009/10. After an increase to 58% in 2006/7 this has decreased to 49% in 2007/8.

LTP1 Demand responsive transport patronage. The Number of passengers on demand responsive services including community transport services, 112,000 in 2004/5. The target is 130,000 passengers on demand responsive services by 2010/11. This is well ahead of target in 2007/8 at 156,000.

LTP2 Change in area wide road traffic mileage. Suffolk County Council strategic counts of roads maintained by the County Council. Baseline 2002 – 2004 average 3.9% growth pa is high compared to national average (for all roads including trunk) of 1.6% pa. The target is not to exceed 23.7% total growth in vehicle kilometres over 2005 to 2010 on County Council roads. This is well on target in 2007/8 at 18.6%.

LTP3 Cycling trips (annualised index). Sample sites representative of on road, shared and segregated facilities. Baseline 2005/06 to be established as new sample of sites selected. Previous monitoring showed 14% fall from 26 sites 2000/01 to 2004/05. The target is no reduction in cycling trips from 2004/05 baseline by 2010/11. This is well on target with an increase of 12% in 2007.

LTP4 Mode share of journeys to school. Biannual survey of school pupils. Baseline 2003/04 65.9% sustainable journeys (by bus, coach, cycle or walk) fallen to 65% in 2004/05. The target is 65% of children travel to school by sustainable modes (walk, cycle, bus or coach) by 2010/11. In 2005/6 this was 65%, which increased to 71% in 2007/8.

As a result of its submission, the County Council received a rating of "excellent" from the Department for Transport (Dft) for its management of local air quality. This was awarded partly in recognition of the close working relationships developed between the two tier local authorities in Suffolk.

Following agreement from the District Council, the County Council will integrate the completed Air Quality Action Plan for the Woodbridge Junction into the LTP process.

3.2 Partnership with Development Planning

The planning system plays a key role in protecting and improving the environment. Land use planning and development control can become an effective tool to improve air quality by first locating developments in such a way as to reduce emissions overall, and secondly reducing the direct impacts of those developments. Although the presence of an AQMA makes consideration of the air quality impacts of a proposed development more important, there is still a need to regard air quality as a material factor in determining planning applications in any location. This is particularly important where the proposed development is not physically within the AQMA, but could have adverse impacts on air quality within it, or where air quality in that given area is close to exceeding guideline objectives itself.

The Government's commitment to the principles of sustainable development were set out in 'A Better Quality of Life – A Strategy for Sustainable Development for the UK', May 1999. Eight principles of particular relevance to planning and pollution control were set out: -

- Taking a long term perspective;
- Putting people at the centre;
- Taking account of costs and benefits;
- Respecting environmental limits;
- Applying the precautionary principle;
- Using scientific knowledge;
- Following procedures which are based on transparency, access to information, effective participation by stakeholders and access to justice; and
- Making the polluter pay.

The national air quality strategy reiterates that the government strongly believes that air quality issues should be dealt with in a holistic and multi-disciplinary way. In developing an air quality Action Plan the District Council has engaged with land-use and transport planners to ensure the actions are supported by all parts of the authority.

3.3 Formation of steering group

A steering group was established to develop the Action Plan, which included officers from Environmental Protection and Development Planning within the District Council and Transport Planning plus the air quality manager at the County Council.

3.4 Action Plan options and their assessment

The steering group, in developing the draft and this final Action Plan, has considered a full range of relevant options to change traffic at the Woodbridge junction. The process has been one of narrowing down the range of potential options to ones that are focussed on the problem, feasible, do not adversely impact on other locations or vulnerable highway users, and are cost-effective compared to others. This section summarises how this was done. Full details of the assessment methodology are provided in Appendix 4, and the results of the assessments for each option are provided in Appendix 5.

Essentially the steering group adopted the following procedure:

- Consideration was given to the full range of potential options.
- Initial decisions were made to determine whether any options were unfeasible or unacceptable and they were eliminated from the options list.
- Remaining options were defined further and underwent a detailed assessment.
- The results of the assessment identified those options to prioritise and to adopt as measures in the Action Plan.

There is a very wide range of options available to reduce the emissions from road transport. The District and County Councils do not necessarily have the power to implement them all directly but potentially they do have a role in attempting to influence those bodies or individuals who could implement them. Therefore, it is appropriate to initially consider all options. The District Council undertook large-scale consultation with local organisations and the public in order to assist with derivation of the list of options for consideration, the application of the assessment methodology, and the options that were chosen as probable measures. A total of 79 options were identified and are detailed in Appendix 5.

Following production of the draft Action Plan a further full public consultation was undertaken to obtain comments and views on the contents. The results from this consultation are detailed in the following section.

3.5 Consultation responses to the draft Action Plan

Schedule 11 of the Environment Act 1995 states that all Local Authorities must consult on the preparation of their Air Quality Action Plan once options to be included in the plan have been developed. This enables local views to be taken into consideration as part of the process, which is of great importance as Local Air Quality Management (LAQM) is about air quality issues relevant to the Suffolk Coastal district.

A full statutory and public consultation on the draft Action Plan for the Woodbridge Junction was undertaken in August 2009 in order to inform production of this final Action Plan.

A total of 19 responses were received, mainly from local stakeholders and residents of the junction. Many of the responses covered a number of issues relating to the draft Action Plan and options for the junction (hence the numbers below do not add to 19). The responses have been grouped into topics and are detailed below. At the end of each suggestion/comment the number of responses received referring to that topic is included in brackets and highlighted in bold type. Where relevant, our comments and any future actions are detailed at the end of each topic.

Responses relating to Measure 1 (Install queue detector at traffic lights – MOVA)

- Feel that installation of MOVA has successfully reduced traffic queuing at the junction **(1)**

Responses relating to Measure 2 (Install a right hand turning lane on Melton Hill)

- Agree that installation of a right hand turning lane on Melton Hill is a good idea **(2)**
- Concerned that installation of a right hand turning lane from Melton Hill could imply more tarmac and less soft landscaping fronting Suffolk Place which would be detrimental to the area **(1)**

The County Council has obtained funding to undertake a basic feasibility study for this measure to investigate whether there is space available for the turning lane to be installed and where that land will come from. This should be completed by the end of 2010 and will be reported on in the annual Action Plan update report. Should the study show that this measure is feasible, more in depth design and computer modelling work will be undertaken to determine what impacts this would have on the traffic and air quality at the junction and therefore whether it will be implemented.

Responses relating to Measure 3 (Pedestrianise the Thoroughfare / increase the restrictions to 8am-6pm)

- Do not agree that access to the Thoroughfare should be reduced in any way as this will hinder business in the town **(2)**
- Thoroughfare cannot be pedestrianised any more than it currently is as residents have to have access by car and deliveries need to be made to businesses **(3)**

This measure has been re-worded and the description expanded upon to better reflect its meaning following additional advice from the County Council Highways Engineers and now reads 'Extension of restrictions to Thoroughfare (8am – 6pm)'. Suffolk County Council advised that pedestrianisation of the Thoroughfare is not a viable option due to the need for access by residents and businesses for delivery purposes during the day.

Extending the hours of the current access restrictions is possible and investigations will be undertaken (should Measures 1 and 2 be unfeasible or unsuccessful) to determine whether this option is viable. These investigations will include consulting local businesses, residents and interested parties to determine the viability of this measure.

Responses relating to Measure 4 (Remove ability to turn right or go straight on from direction of Melton Hill)

- Think that banning the right hand turn from Melton Hill into St. John's Street is a bad idea as it would restrict traffic access to the town centre **(1)**
- Think this would increase traffic using Lime Kiln Quay Road, Quay Street, Church Street and New Street thus causing even more pollution **(1)**

This measure has been altered following further investigations by Suffolk County Council and now reads 'Remove the ability to turn right from the direction of Melton Hill'.

The County Council has considered the original option further and determined that banning the straight on manoeuvre would impact on operation of the Thoroughfare. Traffic would have to reroute and travel along Lime Kiln Quay Road to enter, increasing traffic coming from this direction, or the traffic flow in the Thoroughfare would have to be reversed. If the flow were reversed the traffic lights would have to accommodate an additional phase to allow traffic to exit onto the junction, potentially increasing congestion on the other arms. Reversing the flow could also lead to additional traffic using the Thoroughfare from the Cumberland Street direction as a cut through. Traffic waiting in the Thoroughfare at the lights could cause a new air quality concern as the Thoroughfare is a street canyon and as such any emissions would be difficult to disperse and could lead to exceedance of the objectives. As such, the original option is not considered viable at this time.

Removing the ability to turn right on its own will not have as much of an impact on congestion as the original measure. However, alongside a possible straight on queuing lane on Melton Hill (Measure 2) and increased access restrictions in the Thoroughfare (Measure 3), if they were to be implemented, it could have an impact and help to improve traffic flow on Melton Hill. This suggestion also has its potential problems as it may impact on the amount of traffic using Sun Lane which would need to be investigated.

This measure will be put into the Action Plan for further investigation, this will include consulting local businesses, residents and interested parties to determine the viability of this measure.

Responses to Measures 5 and 6 (Relocate or remove on street parking currently opposite Council Offices)

- Do not agree with moving or removing the parking area along Melton Hill opposite the Council offices **(5)**
- If parking were removed the Council should install dedicated and readily accessible 24-hour parking spaces available to residents in the Council car park **(1)**
- Do not agree that there would be as much as a 5% reduction in traffic queuing and therefore pollution if parking on Melton Hill was relocated **(1)**
- Agree that the parking area along Melton Hill opposite the Council offices should be relocated **(1)**
- Agree that the parking area along Melton Hill opposite the Council offices should be removed **(1)**

There has been a strong local response received in opposition to this measure. A fundamental part of the decision making process regarding this measure will therefore be local consultation so that we can ascertain opinions of all properties that may be involved. Additional air quality modelling work may now be required to confirm what emission reductions are likely to be seen from this measure before any decision can be made.

Responses to Measure 7 (Investigate SatNav systems)

- Agree with and support investigating SatNav routing issues **(3)**

Responses relating to Package of Measures 3 (Direction Signing) together with volume of through traffic using the junction

- Believe that the only package of measures that may begin to address the problem at the junction (being that of traffic volume) is number 3 and this is the weakest section in the document **(1)**
- Encourage more vehicles, especially Heavy Goods Vehicles, to make use of the A12 bypass in order to reduce the amount of through traffic using the route via the Woodbridge Junction **(2)**
- At all main entry points to Woodbridge from A12 and A1152 use signage to prohibit HGVs from entering Woodbridge other than for loading and unloading, and to display the preferred HGV route.
- Decrease the speed limit along the Thoroughfare to 20mph to try and deter traffic from using this route **(3)**
- Believe that we need to decrease the volume of traffic using this route somehow **(4)**
- Change or remove the brown signs from the Bredfield end of the A12 which encourages traffic via Woods lane and through the junction. Make the sign read to Sutton Hoo only. Use more prohibitive signage especially at Woods Lane/Melton Road junction to say 'Woodbridge Local Traffic Only', 'Woodbridge Access Only, No Through Traffic', 'Avoid Woodbridge Town Centre Congestion: follow A1152 and A12' **(3)**
- Add traffic calming measures, by way of crossings and speed reduction to deter through use **(2)**
- Install permanent speed cameras in Melton Road to help deter through traffic **(1)**

- Main recommendation of the document is to reduce queuing times at the junction, this can only be a short term measure and ultimately counter-productive as it will encourage more traffic to use this route **(1)**

There has been a strong local response regarding the amount of through traffic that is perceived to be using this route via the junction and the part that this has to play in the air quality problem. A video cordon survey was commissioned by the District Council to investigate the volume of traffic passing along this route through Woodbridge and the junction which could be classed as 'through traffic'. The survey initially indicates that there could be a significant percentage classed as 'through traffic'. However, the survey did not account for any vehicles which may travel along this route and stop off to use local facilities, thereby not actually being true 'through traffic'. It is very important that the pursuit of air quality improvements is balanced with the needs of the town and local business interests. Additional study of the data gathered is being undertaken to look at the time it took each vehicle classed as 'through traffic' to travel along the route. This will enable us to determine which vehicles travelled straight through without stopping and will give us our percentage of 'through traffic'.

Potential measures available to reduce 'through traffic' using this route will be re-visited following the results of this additional investigation. Details will be provided in the annual Action Plan update report in 2011.

Responses relating to Package of Measures 4 - Encouragement of Public Transport Use

- Agree with measure 8 – encourage bus operators to use cleanest fleet **(1)**
- Agree with measure 12 – new bus station/interchange at Turban Centre if not expensive **(1)**
- Bus upgrades (measure 13) not worth the expense for only a 2% reduction in air quality at this location **(1)**

Responses relating to Package of Measures 5 – Car Sharing and Travel Planning

- Measure 14 – car sharing scheme – think this is impracticable **(1)**
- Measure 15 – travel planning – think this is impracticable **(1)**
- Agree with the necessity for and support Measure 15c relating to a travel plan for the SDCDC offices **(3)**

The car sharing and travel planning measures mainly involve promotion of options that are currently available and therefore involve very little in the way of funding or time allocation. For this reason these measures will remain in the plan in the hope of even a small uptake. A Travel Plan for the District Council Offices was adopted by the Council in November 2009 with a number of key actions to be completed during 2010, many of these actions have now been completed.

The Travel Plan can be viewed at www.suffolkcoastal.gov.uk/NR/rdonlyres/23DF467E-B8EA-4445-B940-BB3CA0C56F2B/0/SuffolkCoastalTravelPlanOctober2009.pdf

Responses relating to Package of Measures 6 – Promotion of Cycling and Walking

- Agree and support measure 16 - promotion of walking and cycling in the town **(1)**

Comments relating to Measures which have not been included in the Action Plan at this time

- Think that we should stop the regular traffic lights and let drivers 'enter in turn', leave the traffic lights for pedestrian crossings only. This could be trialled for 6 months **(2)**

This suggestion was included in the 79 options investigated (option 34 in Appendix 5) in the draft Action Plan. The County Council Highway Engineers provided the following comments regarding this option: it would reduce delays at the junction for the major traffic movements but increase delays on St Johns Street. It may well encourage/increase use of the junction as could be perceived as quicker route than using A1152/A12. This would remove any benefits by increasing the traffic volume using the junction. Formal pelican crossings would be needed on Melton Hill and St Johns Street, however, with narrow pavements, this may not be possible to achieve. Pedestrian crossings would have to be set back along the arms of the junction to achieve visibility, diverting people from their preferred routes. To still be attractive for pedestrian use, they would still be located in the 'problem' area. Extra delays would be introduced in these areas as the crossings would be too far apart to be linked i.e. they would operate independently rather than at present as part of the traffic signal cycle. Many elderly pedestrians in the area would be disadvantaged by them. The County Council's targets of increasing walking would be affected. A junction with no traffic control creates problems for cyclists due to possible increases in traffic speed and less lane control. This could not be trialled using temporary measures as there would be safety issues for both motorists and pedestrians. This option will not be investigated further at this time.

- Could there be an alternative exit to the SCDC car park? **(1)**

This suggestion was included in the 79 options investigated (option 55 in Appendix 5) in the draft Action Plan. The District Council's Property Services Department and Planning Department looked into this idea many years ago. The Railway Inspectorate had safety concerns regarding times when there would be a number of vehicles entering/ exiting the Council's car park causing queues on Sun Wharf. Queues here could potentially block traffic coming over the level crossings and cars may get stuck on the railway tracks. The Highway Authority (the County Council) also had concerns about the junction with Lime Kiln Quay Road and possible queues at peak times. The District Council could investigate this option again but it would require a full report which would be costly and the likelihood is that the Railway Inspectorate would again be against the proposal. In addition the District Council is currently not sure of the lifespan of the offices at Melton Hill due to the local government review currently being undertaken. The District Council has also investigated an exit via the new Deben Mill development but were not granted permission for this from the developers. This is therefore not an option to explore at this time.

- Request for installation of a roundabout at the junction, in place of the current traffic light system **(5)**
- Believe that comments relating to the option of installing a mini roundabout are incorrect and that arguments about minor detrimental aspects of this option are being allowed to out-weigh the great advantage of this option in that it would work. This option being marked as 'low benefit' is wrong **(1)**

There has been a strong and detailed local response received in support of this option (option 23 in Appendix 5). It has therefore been decided that further investigations will be undertaken into the feasibility of installation of a roundabout at this junction. Details will be provided in the annual Action Plan update report in 2011.

- Install a sign at the traffic lights which reads 'Please switch off your engine if the lights are red' **(1)**

This suggestion was not included in the original 79 options considered and as such has now been investigated. It is felt, at this time, that it is not an option we would take up as the new traffic control system (MOVA) installed at the junction should ensure that the number of times that the queue lengths would warrant this approach will be minimal. The possibility that motorists may switch off their engines when the queues were not very long would exist which could cause the traffic to take longer to get through the lights due to the wait for everyone to start up again, particularly with diesel engines. This option, as with all available options, may be reconsidered in the future if it is felt that it would have a beneficial effect.

- The measures included for this junction will not keep even pace with increased traffic in years ahead and the only realistic way to reduce traffic to acceptable levels is to consider a major diversion, such as continuing the link road alongside the railway to join Melton Hill further towards Melton **(1)**

This suggestion was included in the 79 options investigated (option 54 in Appendix 5) in the draft Action Plan and considered unfeasible. It would allow the junction to be by-passed, however the cost of building such a road is likely to be very expensive when considering land to be purchased, flooding risk etc. It may compromise any future duelling of the line to increase the capacity of the rail network. Increased use of the railway is much more sustainable than increasing car use along the A12. This option is still considered unfeasible at this time.

Additional Comments

- Concerns that personal health has deteriorated, particularly with regard to asthma **(4)**

With regard to issues of personal health, this is the driver behind the Local Air Quality Management Regime and is why we have declared an Air Quality Management Area at this junction. This Action Plan will work towards reducing vehicle emissions at the junction and therefore improving air quality for the local residents. We would strongly urge anyone with health concerns to consult their doctor as the authority on personal health.

- Request for additional monitoring locations at the junction along Lime Kiln Quay Road **(2)**

The current monitoring locations for both the continuous analyser and the diffusion tubes cover all arms of the junction and the areas of greatest concern regarding air quality. The choice of these locations was guided by the computer modelling undertaken for the junction, this allowed us to predict the concentrations of nitrogen dioxide at all properties at, and on the approach to, the junction. Due to financial constraints we are unable to place any further monitoring locations at the junction at this time.

- Are happy with the draft Action Plan and its contents **(2)**

3.6 Measures to improve air quality

Of the 79 options, 20 measures have been identified at the current time via assessment (see Appendix 4 for assessment information) for inclusion in this Action Plan as priorities for the improvement of air quality at the Woodbridge Junction and the wider area. These measures have been grouped into Packages where they have similar characteristics or are alternative options to achieve the same end. Each Package of Measures concludes with those options recommended for implementation at this time. This provides 9 Packages of Measures in total which include:

1. Specific options aimed at promoting more sustainable travel choices and reducing queues at the Woodbridge Junction (Package of Measures 1-3)
2. Strategic options aimed at integrating air quality into all relevant areas of decision making within the District and County Councils (Package of Measures 4 – 9).

The measures in the draft Action Plan are detailed in the following section and a summary is presented in table 3. Information regarding implementation of each measure is detailed in Section 4, table 4. This Plan is:

- Focussed – road transport is the dominant source of emissions in the AQMA and queuing vehicles and HDVs are particularly significant sources.
- Proportionate – the plan puts most emphasis on reducing queuing from all vehicles and contains specific measures to attempt to address HDV emissions.
- Realistic – the measures in the plan have been assessed as being the more feasible, acceptable and cost-effective among many options.
- Strategic – key measures to be implemented include improving the District Council's capacity to manage air quality in order to avoid worsening air quality and to make progress towards the air quality standards.
- Sustainable – we believe that the plan can contribute to the District Council community aims to reduce CO₂ emissions as outlined in the Council's draft Climate Change Strategy, improve quality of life (by improved health) and not compromise the local economy or pedestrians and cyclists.

The 20 measures in this draft Action Plan are the ones that the District and County Councils have considered for adoption and implementation in pursuit of the air quality standards within the Woodbridge Junction AQMA at this time. Detailed information on most of the 20 measures is presented in Appendix 5. Some of the identified measures require further study to facilitate which ones are most cost effective. After these studies are complete, the Councils will be able to decide which of the measures are fully warranted for implementation.

Following the public consultation on the draft Action Plan, detailed in the previous section, a number of additional measures will also be investigated to determine whether they will be included in the Action Plan. Updates will be provided in the annual update report required for this Action Plan, due in 2011.

The source apportionment and review and assessment information presented in this report indicates that a 16% reduction in local emissions at Woodbridge junction is required, based on 2006 figures, to achieve the air quality standard. If transport emissions and air quality continue to improve then by the end of 2010 the risk that the annual mean air quality standard for NO₂ will be exceeded will be lower. Before then a 10% reduction in emissions may be required to achieve the standard. The District Council review and assessment activity between now and the end of 2010 will continue to monitor this situation. In this context even a 1-2% reduction in emission can be seen as a significant step towards achieving the air quality standard in the AQMA.

It is anticipated that a reduction of 10% will lead to the achievement of the annual mean NO₂ air quality standard (40µg/m³) within the AQMA and hence potentially the revocation of the AQMA. No additional measures are thought to be required at this time. The District Council will continue to review and assess air quality to monitor this situation and should the chosen measures not deliver the expected reductions, some of the additional options will be reassessed.

Funding for the implementation of this Action Plan is through the Local Transport Plan where existing projects complement the Action Plan. Further funding will be sought through the Department for Environment, Food and Rural Affairs (Defra) air quality grant annual award scheme for the implementation of specific tasks within measures.

Package of Measures 1: Altering Traffic Signal and Junction Configuration

Stationary vehicles give rise to a high proportion of emissions relative to moving traffic. Consequently, measures to reduce traffic queues are likely to reduce emissions. The measures within this package are focussed on reducing congestion at the Woodbridge Junction.

Measure 1 (option 37 Appendix 5) - Install queue detectors on signals to alter timing changes to reduce queues on the junction of Lime Kiln Quay Road, the Thoroughfare and St John's Street.

Microprocessor Optimised Vehicle Actuation (MOVA) is a self optimizing control system for traffic signals developed by the Transport Research Laboratory (TRL). Using an online microprocessor MOVA maintains the optimum green stage, cycle time and control strategy to accommodate prevailing conditions and therefore minimise queuing at signalised junctions. TRL tests have shown on average a 13% delay saving for the motorist over conventional vehicle actuation controlled traffic signals. This reduction in queuing traffic should lead to a reduction in Nitrogen Dioxide levels at the junction. MOVA has been reported to produce emission reductions up to 15% (McCrae, 2009).

Measure 2 (option 22 Appendix 5) - Put in a right hand turning/queuing lane on Melton Hill so cars can get past to filter left (could then reassess the light timings again to assist other arms of the junction).

This measure is expected to reduce some of the queuing at the junction. If combined with a ban on right turn into St John's/additional access restrictions on Thoroughfare, it could remove some delays. This measure is likely to reduce emissions of nitrogen oxides from traffic at the junction in the direct vicinity of the AQMA. However, to implement it may need land from adjacent flats as the pavement is narrow. It would appear that often there is only one vehicle at the front of the queue on Melton Hill wishing to either go straight on or turn right which holds up the rest of the traffic. If there is a possible way to allow left filtering vehicles to get round any queuing vehicle(s) it could have a positive impact on queues and the traffic flow.

Measure 3 (option 50 Appendix 5) – Extension of the restrictions to the Thoroughfare (8am – 6 pm).

This measure has been re-worded and the description expanded upon to better reflect its meaning following additional advice from the County Council Highways Engineers. The measure previously read 'Pedestrianise the Thoroughfare/ increase the restrictions to 8am-6pm'. Suffolk County Council advised that pedestrianisation of the Thoroughfare is not a

viable option due to the need for access by residents and businesses for delivery purposes during the day.

Extending the hours of the current access restrictions is possible and investigations will be undertaken (should Measures 1 and 2 be unfeasible or unsuccessful) to determine whether this option is viable. These investigations will include consulting local businesses, residents and interested parties to determine the viability of this measure. Increasing the current access restrictions from 10am-4pm to 8am-6pm would remove some of the traffic which queues on Melton Hill to go straight over into the Thoroughfare when the green left turn filter light is on. This is particularly important during peak hours which are not currently included in the access restrictions. This measure would reduce congestion on the Melton Hill arm of the junction where the AQMA is situated and in turn reduce vehicle emissions in this location.

Measure 4 (option 26 Appendix 5) - Remove the ability to turn right from the direction of Melton Hill

This measure has been altered following further investigations by the County Council. The measure previously read 'Remove the ability to turn right or go straight on from the direction of Melton Hill'.

The County Council has considered the original option further and determined that banning the straight on manoeuvre would impact on operation of the Thoroughfare. Traffic would have to reroute and travel along Lime Kiln Quay Road to enter, increasing traffic coming from this direction, or the traffic flow in the Thoroughfare would have to be reversed. If the flow were reversed the traffic lights would have to accommodate an additional phase to allow traffic to exit onto the junction, potentially increasing congestion on the other arms. Reversing the flow could also lead to additional traffic using the Thoroughfare from the Cumberland Street direction as a cut through. Traffic waiting in the Thoroughfare at the lights could cause a new air quality concern as the Thoroughfare is a street canyon and as such any emissions would be difficult to disperse and could lead to exceedance of the objectives. As such, the original option is not considered viable at this time.

Removing the ability to turn right on its own will not have as much of an impact on congestion as the original measure. However, alongside a possible straight on queuing lane on Melton Hill (Measure 2) and increased access restrictions in the Thoroughfare (Measure 3), if they were to be implemented, it could have an impact and help to improve traffic flow on Melton Hill. This suggestion also has its potential problems as it may impact on the amount of traffic using Sun Lane which would need to be investigated.

This measure will be put into the Action Plan for further investigation, this will include consulting local businesses, residents and interested parties to determine the viability of this measure.

Recommendation: Altering Traffic Signals and Junction Configuration

Measure 1 will be implemented, with a 'before and after' traffic queue survey to understand its impact. Should further emission reduction be necessary, it is recommended that initial feasibility studies be undertaken (including public consultation), followed by a detailed junction study, on measures 2 and 3 to ascertain the impact on traffic flows and air quality. Implementation of these measures can be considered after the initial feasibility studies are complete and the success of measure 1 is determined. Measure 4 would only be considered if measures 2 or 3 were found not to be feasible or successful.

Package of Measures 2: On Street Car Parking

On street parking is currently situated on Thoroughfare / Melton Hill opposite the District Council Offices. The location of parked vehicles reduces the width of the carriageway such that two-way traffic is not possible when a larger vehicle is involved (for example large van, bus, Heavy Goods Vehicle). This can lead to traffic queuing down towards the junction which, if the queue is long, will add to emissions affecting the AQMA.

Measure 5 (option 5 Appendix 5) - Relocate parking - move to opposite side of the road to keep traffic away from houses

This measure would help reduce speed on approach to the junction down Melton Hill and control volume of traffic on approach to signals. Traffic is more likely to queue up and past the District Council Offices where receptors are not as close to the road. This measure might make the route less attractive to traffic from the north and reduce traffic flow. It also may require pavement widening.

Measure 6 (option 3 Appendix 5) - Remove on street parking opposite the District Council Offices

Parking on the street opposite the council offices causes queuing at busy times. Removing the parking would aid traffic flow near to the junction. It would also increase the speed that traffic clears the junction. A negative impact is increased traffic speed in the area which would decrease road safety, but to counteract this, an increase in pavement width would help to lower speeds.

Recommendation: On Street Parking

Measure 5 is the preferred first option since it will continue to provide parking for residents. However, there has been strong local resident objection to both measures via the consultation process and this will be taken into account when assessing these options.

Package of Measures 3: Direction signing

Measure 7 (option 10 Appendix 5) - Investigate Satellite Navigation systems (SatNav) and their preferred route to Martlesham / the Peninsula

There are anecdotal reports on SatNav sending vehicles through Woodbridge town rather than via the A12/A1152. SatNav companies will be approached to remove this as a route and re-route along Woods Lane. This may achieve some traffic reduction, particularly the HDVs which give rise to a high proportion of emissions.

Recommendation: Direction Signing

This measure is recommended. The consultation process has shown strong support for additional measures to be included relating to reducing the volume of through traffic on this route, which includes several ideas relating to Direction Signing. Further detail is provided in the previous section of this report. Additional investigation is currently being undertaken to determine the percentage of through traffic and additional measures will be considered following the outcome.

Package of Measures 4: Encouragement of Public Transport Use

Generally in the UK, 25% of Britain's car journeys are less than 2 miles, which is a distance that can be covered by walking or cycling. Also, 17% of car journeys are travelling to and from work while school journeys are estimated at 17.5% of morning peak traffic in urban areas in term time. Indeed, if half of UK motorists received a lift one day a week, pollution would be reduced by 10% and traffic jams by 20%. It is therefore important to consider the promotion of public transport uptake, car sharing and travel planning within the Woodbridge area and Suffolk in general.

The County Council's Bus Strategy was published in 2006. Regarding air quality the following objectives are set:

- Providing that services are well used, passenger transport helps to minimise the impact of travel on the environment by helping to reduce the number of vehicles on roads - a double-deck vehicle can carry more than 70 passengers.
- Modern vehicles are built to stringent European emission standards, however older vehicles do not have to meet these standards. Consequently it is important that an economic climate exists in the county where operators are able to invest in the replacement of older vehicles.
- There is potential to reduce vehicle emissions further through use of alternative 'dual fuelled' diesel/electric vehicles, particularly within urban areas that are more susceptible to pollution issues.
- Park and ride services intercept car trips and can help reduce the impact of travel on air quality for key areas.

Measure 8 (option 43 Appendix 5) - Work in partnership with Bus Operators and the Passenger Transport Unit to investigate improvements to buses using the junction.

The option of setting up a Bus Quality Partnership has been investigated and does not appear to be the best way forward for Woodbridge. Bus Quality Partnerships are most successful when limited to single operators and in Woodbridge several operators are in place. Instead work will be undertaken with the Bus Operators to see if anything can be done to help reduce emissions at the junction (cleanest buses on fleet used on routes that go through the junction), and work with the Passenger Transport Unit at the County Council to promote bus patronage and look at options regarding future bus contracts.

The District Council will contact the bus operators to request that where possible the cleanest vehicles in their fleet are deployed in Woodbridge and help promote bus patronage.

Measure 9 (option identified by the County Council) - Introduction of Demand Responsive Transport in Woodbridge

The County Council Passenger Transport Unit is currently investigating the uptake of Demand Responsive Transport within pilot areas of Suffolk. This is where bus services are stopped and are replaced by other modes such as taxis. A pilot scheme, implemented during the summer of 2009, encompasses the Bawdsey peninsula and has direct consequences for bus services through Woodbridge. The concept is that the core bus timetable will be reduced to corridors of known regular demand. Irregular and more isolated demand will be catered for by Demand Responsive Transport that by definition only operates when required. This will then connect with existing conventional bus services rather than duplicating the resource. In some cases this will mean only a taxi responding to the demand or a small minibus instead of a large bus. This will reduce the number of bus movements through the Woodbridge area using the Turban Centre as a key interchange point.

Measure 10 (option identified by the County Council) - Simplified ticket schemes for public transport

The County Council is at the early stages of investigating simplified ticketing schemes for the greater Ipswich area. Surveys have revealed that a key reason why people do not use public transport is that they do not understand how it works. A key component of this is the purchase of tickets. The County Council anticipate that by simplifying ticketing and possibly looking at fares based on zones, new passengers will be attracted to services thus increasing patronage. Innovative schemes such as the Explore card offer discounted travel to young people encouraging use of bus services and familiarity with services that will hopefully translate into habitual use.

In addition, the County Council is investigating the Plus bus ticket scheme for Woodbridge. There is already a plus bus scheme for rail services that allows the purchase of a ticket that is valid on buses run by operators within the scheme. Currently Ipswich is in the scheme but Woodbridge is not.

Measure 11 (option identified by the County Council) - Improve accessibility to the bus timetable

Task 1: Revise timetable on website

The County Council is reviewing its public website and this will offer the Passenger Transport Unit the opportunity to completely revise and improve the way that information is presented. This will include all timetable information across the whole of Suffolk. The County Council has recently had success in getting operators to place links on their own websites linking the public to the timetable pages and the County Council is actively seeking new partners to duplicate this approach. In Woodbridge the latest bus timetables for the district can be picked up from the Council's Melton Hill offices, or any of the tourist information centres at Felixstowe, Aldeburgh or Woodbridge itself.

Task 2: Improve paper timetables for bus routes

The County Council Passenger Transport Unit identified that the old Area Book system of Timetables was not particularly user friendly and often led to people just tearing out the pages they needed and discarding the rest. The format of the timetables was also not as user friendly as it could be. The seven books have now been replaced by 22 leaflets in a pocket size format with improved features including simplified maps and easier to read timetables. These have been well received by the public.

Task 3: Bus timetable publicity at the roadside

The County Council Passenger Transport Unit has adopted a new "brand" that allows all publicity produced by the County Council to be readily identified as being related to public transport, a leaflet has the same look as roadside publicity for example. Roadside publicity is also under review at present and major steps have been made in improving both the quality and quantity of information available at this level.

Measure 12 (option identified by the County Council) - Turban Centre new bus station/interchange at Woodbridge

There is a desire to invest in a new bus station/interchange at Woodbridge either on or near the site of the current bus station. Previous capital projects of this nature have delivered high quality and attractive areas where the public can feel comfortable and safe. The latest investment was in Lowestoft. The capital investment in Woodbridge currently has no start date as no firm decision has been made regarding the location. It is also envisaged that at some stage the interchange will provide real time passenger information to further instill

confidence in bus services.

Measure 13 (option identified by the County Council) - Update of bus fleet to improve emissions

It is expected that in early 2009 the County Council Passenger Transport Unit will be adopting a quality assessment model when awarding tenders for bus services. Price will still be the major factor in the award process but quality will account for up to 30% of the tender score. In turn this quality element will include factors such as the age of vehicle, emission standards, company environmental policy, staff training policy, for example. It is anticipated that the net effect should be that companies investing in newer fuel efficient vehicles will score well, and consequently, older vehicles will be removed from the fleet. As well as providing benefits to users in terms of improved accessibility and general improvement to the ambience of their travel experience, and hence improve patronage, modern vehicles are required to meet stringent vehicle emission standards (currently Euro IV for new vehicles). In accordance with the Disability Discrimination Act 2005, all buses must be compliant for wheelchair access by 2015. The current bus fleet will be replaced with Euro III standard vehicles as a minimum, these will have lower floors and comply with the Disability Discrimination Act 2005. The replacement of the older vehicles will reduce the emissions from the fleet throughout Suffolk.

Recommendation: Encouragement of Public Transport Use

All measures are recommended

Package of Measures 5: Car Sharing and Travel Planning

The encouragement of travellers to plan their journey and share transport when possible is likely to lead to fewer vehicle trips and, therefore, lower emissions. Car sharing and travel planning are therefore important measures to improve air quality.

Measure 14 (option identified by County Council) - Car Sharing Scheme

Car sharing schemes operate in urban areas around the UK, and have been reported to reduce driver days by up to 36% (Jones, 2009).

As part of Suffolk's commitment to reduce congestion and pollution, the County Council, Suffolk Chamber of Commerce and Suffolk ACRE are working in partnership in association with *liftshare* to set up www.suffolkcarshare.com, which is managed by Suffolk ACRE. This website aims to promote all forms of transport and integrate both public and private transport modes. It's about maximising people's travel options whilst also reducing the number of cars on the roads, cutting pollution, saving money and protecting the environment.

SuffolkCarShare.com is free to use and has been built and designed for every possible user. To date the car sharing scheme, which operates throughout Suffolk, has over 1000 registered members. The District Council will aim to promote this scheme.

Measure 15 (options 60 & 79 Appendix 5) - Travel Plans

A Travel Plan (sometimes referred to as a green travel plan) is a package of measures designed to influence the travel behaviour of individuals, businesses, schools or other organisations through promoting sustainable travel. The general aim is to reduce the negative effects of traffic by encouraging alternatives to single-occupancy car-use.

The County Council is working with businesses, schools, developers and individuals by promoting sustainable travel through travel planning. <http://www.suffolktravelplans.com/>

Within the District Council's Local Development Framework Preferred Options travel plans are sought under the Development Control Policy DC21. Proposals for new development that would have significant transport implications shall be accompanied by a Green Travel Plan'. It is not necessarily the size of the development that would trigger the need but more the nature of the use. It would include:

- new employment sites employing over 10 people
- a use which is aimed at the public (eg retail, leisure activities)
- major residential development

The Travel Plans should seek to:

- (a) reduce the use of cars by encouraging car sharing;
- (b) provide links to enable the use of public transport;
- (c) improve road safety for pedestrians and cyclists; and
- (d) Identify any mitigation works to be funded by the developer in conjunction with the proposal.

Measure 15a (option 79 Appendix 5) - Business Travel Plans

The County Council actively works with businesses with a minimum of 60 employees to prepare and implement a business travel plan. To date, most of the focus has been on businesses within Ipswich, Lowestoft and Bury St Edmunds.

To encourage businesses within Woodbridge to prepare travel plans the following tasks are outlined:

Task 1: Identify businesses within Woodbridge that have greater than 60 employees

Task 2: The District Council to work in partnership with the County Council to contact these businesses

Task 3: Assist where possible in the preparation of the business travel plans

Task 4: Monitor the completion and implementation of the travel plans

Task 5: The District Council will promote travel plans for business with less than 60 employees through advertisement and a presentation.

Measure 15b (option 60 Appendix 5) - School Travel Plans

The County Council has already begun a rolling programme and has ensured that all schools had a Green Travel Plan by March 2010, this does not include private schools however. For example, the school on Pytches Road has a Travel Plan which shows evidence of reduced vehicle use.

Measure 15c (option 62 Appendix 5) - Travel Plan for the District Council offices

A Travel Plan for the District Council Offices was adopted by the Council in November 2009 with a number of key actions for 2010, many of these actions have now been completed. It is hoped that this will have a beneficial effect on emissions and air quality at the Woodbridge Junction.

The Travel Plan can be viewed at www.suffolkcoastal.gov.uk/NR/rdonlyres/23DF467E-B8EA-4445-B940-BB3CA0C56F2B/0/SuffolkCoastalTravelPlanOctober2009.pdf

Recommendation: Car Sharing and Travel Planning

All measures are recommended.

Package of Measures 6: Promotion of Cycling and Walking

Measures to encourage cycling and walking rather than using car especially for local journeys are important to reduce emissions and hence improve air quality.

Measure 16 (option 72 Appendix 5) – Try to reduce traffic in Woodbridge - Promotion of cycling and walking in Woodbridge

The provision of facilities to encourage people to make short trips on foot or by bicycle, rather than by car is very important. Within the Local Transport Plan, the County Council has set out programmes of improvements to walking and cycling routes, with crossings in the centres of the larger market towns to make it easier for people to access schools, shops and other local services. This measure comprises two tasks:

Task 1: Review the current walking and cycling routes across Woodbridge and identify where improvements can be made

Task 2: Prepare a detailed implementation programme for such works in Woodbridge.

Recommendation: Promotion of Cycling and Walking

This measure is recommended.

Package of Measures 7: Development Planning

Measure 17 (option 68 Appendix 5) - Consider air quality within the Local Development Framework for the future

The planning system plays a key role in protecting and improving the environment. Land use planning and development control can become an effective tool to improve air quality by first locating developments in such a way as to reduce emissions overall, and secondly reducing the direct impacts of those developments. As air quality is a material planning consideration, the District Council is contributing to a Supplementary Planning Document on air quality being prepared by the County Council for the whole of Suffolk. This will help to understand the air quality impact of any proposed development by planners, environmental services officers and developers.

The Supplementary Planning Document will seek to ensure that developments in Suffolk Coastal are well served by public transport, pedestrian and cycle facilities in order to promote sustainable travel. It will enable the District Council to secure appropriate developer contributions and ensure resources are targeted towards schemes that promote long term sustainable travel. The inclusion of an indicator in the Local Development Framework that measures access by public transport to services from new residential developments, will also help us to monitor progress in incorporating sustainable travel into the planning process.

Recommendation: Development Planning

This measure is recommended.

Package of Measures 8: Promotion of air quality issues

To monitor the impact of this Action Plan on the improvement of ambient air quality it is important that the District Council measures the air pollutant concentration and reports this into the public domain. With effective communications the District Council can raise awareness about the air pollution problem to encourage more sustainable travel in Woodbridge.

Measure 18 - Continue to improve and raise the level of knowledge and publicity relating to air pollution

The District Council will continue to raise the level of knowledge of air pollution in Woodbridge and release press statements when appropriate to promote sustainable travel options.

Measure 19 - Continue to monitor air pollution

The District Council will continue to undertake routine monitoring of air pollution in existing AQMAs and locations around the District and change the number of monitoring points as necessary. The District Council will continue to report progress on air pollution monitoring.

Recommendation: Promotion of air quality issues

All measures are recommended.

Package of Measures 9: Feasibility Studies and Funding

In preparing this Action Plan the District Council and the County Council have not had all relevant traffic data available to undertake a detailed analysis of all measures. Target emission reductions for each measure that have been derived are therefore uncertain for some measures and have been based on judgement and available information. It is therefore important that the Councils undertake some further feasibility studies for example to determine which junction alteration (measure 2 or 3) is most appropriate. Funding streams have to be identified to enable such feasibility studies.

Measure 20 - Undertake identified feasibility studies

The District and County Councils will work together to undertake identified feasibility studies of measures to determine more robustly the effectiveness and cost of options. These feasibility studies will require traffic counts to be undertaken which will be used in transport modelling to investigate the impact of the measure on traffic flows and emission reduction.

Recommendation: Feasibility Studies and Funding

This measure is recommended.

Table 3 Summary of Action Plan measures for the Woodbridge Junction.

No	Measure description	Focus	Lead Authority
1	MOVA installation	Reduce queuing traffic at the lights	SCC
2	Junction alteration – right hand turning lane at junction on Thoroughfare / Melton Hill <i>(only for consideration if measure 1 is not successful)</i>	Reduce queuing traffic at the lights	SCC
3	Extension of restrictions to Thoroughfare (8am-6pm) <i>(only for consideration if measure 1 is not successful and measure 2 is no feasible or successful)</i>	Reduce traffic at junction	SCC
4	Junction alteration – remove ability to turn right from direction of Thoroughfare / Melton Hill <i>(only for consideration if measure 1 is not successful and measures 2 or 3 are not feasible or successful)</i>	Reduce queuing traffic at the lights	SCC
5	Relocate on street parking to opposite side of carriageway	Reduce queuing traffic in AQMA	SCC
6	Remove on street parking opposite the Council offices <i>(only for consideration if measure 5 is not successful)</i>	Reduce queuing traffic in AQMA	SCC
7	Investigate Satellite Navigation system routes around the town	Reduce traffic flows through the AQMA junction	SCDC
8	Bus operators to use cleanest fleet in Woodbridge	Reduce emissions from HDVs through the AQMA junction	SCDC
9	Demand Responsive Transport	Reduce traffic flows through the AQMA junction	SCC
10	Simplified Ticket scheme	Reduce traffic flows through the AQMA junction	SCC
11	Improve accessibility to bus timetable	Reduce traffic flows through the AQMA junction	SCC
12	Turban Centre new bus station/interchange	Reduce traffic flows through the AQMA junction	SCC
13	Procurement of bus contracts to include fleet upgrade	Reduce emissions from HDVs through the AQMA junction	SCC
14	Car sharing scheme	Reduce car trips	SCC
15	Travel Planning: <ul style="list-style-type: none"> - Business - Schools - SCDC 	Reduce reliance on car and reduce queuing time in AQMA	SCC / SCDC
16	Promotion of cycling and walking in Woodbridge	Reduce traffic flows through the AQMA	SCC / SCDC
17	Integration with planning system	Avoid worsening AQ and open the S106 funding stream	SCDC
18	Raise air quality awareness	Reduce traffic flows in AQMA	SCDC
19	Monitor air quality	To report progress	SCDC
20	Undertake identified feasibility studies	To fully understand the impact of identified measures	SCDC / SCC

4 Implementation Plan

4.1 Summary of actions taken already

Measures have already been introduced which it is believed may have had a beneficial effect on air quality in Woodbridge. A brief description of these measures is provided here.

Traffic light timings at the Woodbridge Junction

The timing of the lights at the junction was originally optimized to minimize vehicle queuing times and now a queue detection system (MOVA) has been installed. This should have the effect of reducing the emissions from vehicles standing stationary with their engines idling, which in turn should reduce the impact of traffic on air quality at the junction. In addition the traffic sensor at this junction has been checked to ensure it is working such that flow is optimised.

Alteration of traffic lights at Melton crossroads

The timing of newly installed traffic lights has been set to make them more efficient at maintaining or prioritising flows on A1152. Actions to deter traffic entering Woodbridge from the south-east would also affect traffic heading towards the A12, reducing the attractiveness of this as a route.

4.2 Traffic counts

To facilitate the implementation of the traffic management options, traffic surveys of the current levels need to be reassessed. Following implementation of any option, the impact on the traffic can then be reviewed and the success of the option measured. The following traffic surveys have been undertaken / are planned:

1. Permanent traffic counters were installed on Melton Hill and Lime Kiln Quay Road in April 2009.
2. Manual 12-hour turning count survey (classified according to vehicle type) from 7am to 7pm at the Woodbridge Junction was undertaken in April 2009.
3. Traffic queue counts were undertaken in late 2009, before the installation of the MOVA traffic signal control system at the Woodbridge Junction.
4. Traffic queue counts will be undertaken again following the installation of MOVA.

These traffic data can be compared to those undertaken in the past for the purposes of the detailed air quality assessments. Before and after traffic queue length surveys will be undertaken to ascertain the impact of measures.

4.3 Implementation of Action Plan measures

A number of measures included in this Action Plan require basic and / or in-depth feasibility studies to be undertaken before a decision can be reached on whether they can be implemented. This will include public consultation on those measures which may impact on local residents and / or businesses. Table 4 overleaf provides a description of actions required in order to progress each of the 20 measures included in this Action Plan, together with a timetable, a progress indicator and a potential target emissions reduction for each.

The 'potential target emissions reduction' is an indication of what percentage of the overall level of NO_x may be reduced if the measure is implemented and works to its fullest potential. In reality these targets may not all be reached due to the number of factors involved but they are an indication of what could be achieved. These percentages have been derived based on professional judgement of AEA Technology plc, Dr Beth Conlan, who were commissioned to produce the draft Action Plan for this AQMA.

4.4 Consultation

Consultees for the Action Plan

The draft Action Plan was issued to the following consultees and as appropriate, and the Action Plan has been amended to reflect their views and comments:

All properties in the Air Quality Management Area and on the Woodbridge Junction

Woodbridge Town Council

Suffolk County Council

Defra

All Parish and Town Councils within the Suffolk Coastal District

Local Chambers of Commerce

Federation of Small Businesses

Bus Operators in Suffolk

Babergh District Council

Forest Heath District Council

Ipswich Borough Council

Mid Suffolk District Council

St Edmundsbury District Council

Waveney District Council

All Suffolk Coastal District Council Departments

Highways Agency

Environment Agency

English Nature

Freight Transport Association

Suffolk Coastal District Council website for general public access

4.5 Monitoring the Action Plan

The Action Plan will be monitored annually and the results collated for the yearly progress report on the implementation of the Plan. The progress report will include details of any measures still under investigation for inclusion in the Action Plan.

Table 4 Action Plan measures - implementation details and timetable

Measure	Focus	Lead Authority	Task Description	Implementation Date	Progress Indicator	Potential target emission reduction
Package of measures 1: Altering traffic signal and junction configuration						
<u>Measure 1</u> Install queue detectors on traffic signals to reduce queuing at the junction	Reduce queuing traffic at the lights	SCC	Traffic queue survey at the junction prior to installation	Late 2009	Survey completed	10%
			Installation of traffic signal queue detectors (MOVA)	Early 2010	Queue detector installed March 2010	
			Traffic queue survey at the junction following installation	2011	Peak queue lengths	
<u>Measure 2</u> Install right hand turning lane at lights on Thoroughfare /Melton Hill arm For consideration if Measure 1 is not successful.	Reduce queuing traffic at the lights	SCC	Basic feasibility study	2010 / early 2011	Study completion	Approx. 5%
			Traffic and air quality modelling study if this measure proves feasible	2011	Study completion	
			If installation to go ahead, traffic queue survey at the junction prior.	2012	Survey completion	
			Further detailed scheme design	2012 / early 2013	Design completion	
			Installation of right hand turning lane if both studies confirm feasibility and Measure 1 not successful.	2013	Turning lane installed.	
			Traffic queue survey at the junction following installation	Late 2013	Peak queue lengths	
<u>Measure 3</u> Extension of restrictions to Thoroughfare (8am-6pm)	Reduce queuing traffic at the lights	SCC	For consideration if Measures 1 and 2 are not feasible or not successful.	2012	N/A currently	2%
<u>Measure 4</u> Remove ability to turn right from direction of Thoroughfare / Melton Hill	Reduce queuing traffic at the lights	SCC	For consideration if Measure 1 is not successful and Measures 2 and 3 are not are not feasible or not successful.	2013	N/A currently	N/A currently as dependant on measures 2 and 3

Measure	Focus	Lead Authority	Task Description	Implementation Date	Progress Indicator	Potential target emission reduction
Package of measures 2: On street car parking						
<u>Measure 5</u> Relocate the on street parking currently in Thoroughfare /Melton Hill to the opposite side of carriageway.	Reduce queuing traffic in AQMA	SCC	Feasibility study and resident consultation	Late 2010	Study completion	5%
			If study confirms this measure is feasible, traffic queue survey prior to parking relocation. (use results from queue survey following Measure 1 implementation)	2011	Survey completion	
			If feasible, relocate parking to the opposite side of the carriageway	Early/mid 2011	Parking relocated	
			Traffic queue survey at the junction following installation	Late 2011 / early 2012	Peak queue lengths	
<u>Measure 6</u> Remove the on street parking currently in Thoroughfare /Melton Hill.	Reduce queuing traffic in AQMA	SCC	For consideration if Measure 5 is not successful	2013	N/A currently	5%
Package of measures 3: Direction signing						
<u>Measure 7</u> Investigate Satellite Navigation (SatNav) system routes around the town	Reduce traffic flows through the AQMA junction	SCDC	Contact SatNav Companies to establish whether vehicles are being sent through the AQMA junction unnecessarily.	2010	Companies contacted and any concerns identified.	1%
			If the study shows up any concerns regarding SatNav Systems look into how to try and solve this.	2010 / 2011	SatNav Systems altered where required. Peak queue lengths reduced at junction.	

Measure	Focus	Lead Authority	Task Description	Implementation Date	Progress Indicator	Potential target emission reduction
Package of measures 4: Encouragement of public transport use						
<u>Measure 8</u> Bus operators to use cleanest fleet in Woodbridge	Reduce emissions from HDVs through the AQMA junction	SCDC	Contact bus operators using the AQMA junction to request for cleanest fleet to be used in this area.	2010	Contact made with bus operators. No. of Euro IV buses operating in Woodbridge	2%
<u>Measure 9</u> Demand Responsive Transport	Reduce traffic flows through the AQMA junction	SCC	To be put in place by SCC	2009	Scheme in place as of 2009. Increase bus patronage	2%
<u>Measure 10</u> Simplified Ticket Scheme	Reduce traffic flows through the AQMA junction	SCC	Working group to be set up by SCC to investigate this option	2009	Group set up 2009.	1%
			Trial the scheme in Ipswich and surrounding areas – to cover Woodbridge	Mid/late 2011	Trial undertaken to cover Woodbridge. Increase in ticket sales and bus patronage.	
			If trial is successful, implementation of the scheme to cover Woodbridge	Mid 2012	Launch Increase ticket sales & bus patronage	
<u>Measure 11</u> Improve accessibility to bus timetable	Reduce traffic flows through the AQMA junction	SCC	Improve website and deliver new timetable leaflets.	2009	Website launch. Leaflets delivered 2009. Increase bus patronage	1%
<u>Measure 12</u> Turban Centre new bus station/interchange	Reduce traffic flows through the AQMA junction	SCC	SCC and SCDC to agree a design option	2010 / early 2011	Design option agreement.	2%
			Construction of new bus station	2011 / early 2012	Opening of new bus station. Increase bus patronage	

Suffolk Coastal District Council Air Quality Action Plan

Measure	Focus	Lead Authority	Task Description	Implementation Date	Progress Indicator	Potential target emission reduction
<u>Measure 13</u> Procurement of bus contracts to include fleet upgrade	Reduce emissions from HDVs through AQMA junction	SCC	Put a quality assessment in place as part of the procurement process	Late 2009	Quality assessment in place as of November 2009.	2%
			In accordance with the Disability Discrimination Act 2005 all buses must be compliant for wheelchair access by 2015. Buses to be replaced with lower floors to comply. All will be of Euro III standard.	2015	All buses to be compliant and of Euro III standard.	
Package of measures 5: Car sharing and travel planning						
<u>Measure 14</u> Car sharing scheme	Reduce car trips	SCDC	Promote the car sharing scheme run by Suffolk ACRE	2010 and on-going	Increased number of registered users of the scheme	2%
<u>Measure 15a</u> Business Travel Plans	Reduce reliance on car and reduce queuing time in AQMA	SCDC / SCC	Produce a list of businesses in Woodbridge with >60 employees that can be sent to the Business Travel Plan co-ordinator at SCC to contact.	2010	Number of Travel Plans adopted by Woodbridge companies.	2% for 15a,b and c in combination
			SCC Business Travel Team to contact Businesses identified	2010 / early 2011	Businesses contacted	
			Arrange through the Woodbridge Town Centre Management Group to promote the use of the Travel Planning service – arrange a talk for Town Centre businesses.	Early 2011	Number of Travel Plans adopted by Woodbridge companies	
<u>Measure 15b</u> School Travel Plans	Reduce reliance on car and reduce queuing time in AQMA	SCDC / SCC	Schools – all schools in Woodbridge to have a Travel Plan. Currently only Woodbridge School is without one.	2010	All Woodbridge schools with Travel Plan	2% for 15a,b and c in combination
			Schools – contact Woodbridge schools to promote use of their Travel Plan	2010	Schools contacted.	

Measure	Focus	Lead Authority	Task Description	Implementation Date	Progress Indicator	Potential target emission reduction
<u>Measure 15c</u> Travel Plan for the District Council offices	Reduce reliance on car and reduce queuing time in AQMA	SCDC / SCC	SCDC to draft and adopt Travel Plan	Late 2009	Travel Plan adopted November 2009	2% for 15a,b and c in combination
			Travel Plan key actions to be completed	November 2010	Key actions completed	
Package of measures 6: Promotion of cycling and walking						
<u>Measure 16</u> Promotion of cycling and walking in Woodbridge	Reduce traffic flows through the AQMA	SCC / SCDC	Build a base network of the current situation in Woodbridge.	2010 / early 2011	Study completion	1%
			Investigate any suggestions which come out of the above process	2012	N/A currently. Increase no. cyclists and walkers	
Package of measures 7: Development planning						
<u>Measure 17</u> Integration with Planning System	Avoid worsening air quality and open the S106 funding stream	SCDC	Produce draft Supplementary Planning Document for Suffolk and put out to consultation	2010 / early 2011	Adoption of Supplementary Planning Document by SCDC	1%
			Use S106 funds to implement the Action Plan where relevant	N/A currently	N/A currently	
Package of measures 8: Promotion of air quality issues						
<u>Measure 18</u> Raise air quality awareness	Reduce traffic flows in AQMA	SCDC	Promotion of air quality	On-going	Number of articles published	N/A
			Air quality reports on the SCDC website	On-going	Air quality reports put onto website once ready for Consultation	

Suffolk Coastal District Council Air Quality Action Plan

Measure	Focus	Lead Authority	Task Description	Implementation Date	Progress Indicator	Potential target emission reduction
<u>Measure 19</u> Monitor air quality	To report progress	SCDC	On-going	On-going	On-going	N/A
Package of measures 9: Feasibility studies and funding						
<u>Measure 20</u> Undertake identified feasibility studies	To fully understand impact of identified measures	SCDC / SCC	Feasibility studies undertaken for Measures 2 and 5.	2011	Feasibility studies completed.	N/A

5 Conclusions

This Action Plan describes the air quality assessment process that has taken place in Suffolk Coastal to date, identifies the role of traffic in the current problem and sets out a range of transport-focussed measures that could help improve air quality. In total, 79 options were considered. Some of these are based on measures already under consideration, and have been drawn from existing plans and policies. Additional options have been suggested to complement planned and ongoing activity. Of these options, 20 have moved forward as measures for implementation or further feasibility study. Following extensive statutory and public consultation on the draft Action Plan, a number of changes have been made (see summary changes section at the start of this document) and a number of additional measures are under-going further investigation for possible future inclusion in the Action Plan.

The objective of this Action Plan is to improve air quality at the Woodbridge Junction to work towards meeting the national air quality objective for the protection of human health. To this end, target emission reductions for the measures have been estimated and indicators to demonstrate progress have been identified. Implementation of measures is now on-going and annual updates will be provided in the form of an Action Plan Progress Report. Over time, should the measures chosen prove not to be fully successful in reduction of nitrogen dioxide concentrations in the AQMA, other measures available will be reassessed.

Appendices

Appendix 1: UK air quality standards and objectives

Appendix 2: AQMA Order for the Woodbridge Junction within the Suffolk Coastal District

Appendix 3: Maps of Further Assessment of air quality at the Woodbridge Junction AQMA

Appendix 4: Assessment methods

Appendix 5: Assessment of Action Plan options

Appendix 1

UK air quality standards and objectives

Objectives included in the Air Quality Regulations 2000 and (Amendment) Regulations 2002 for the purpose of Local Air Quality Management

Pollutant	Air Quality Objective		Date to be achieved by
	Concentration	Measured as	
Benzene All authorities	16.25 µg/m ³	running annual mean	31.12.2003
Authorities in England and Wales only	5.00 µg/m ³	annual mean	31.12.2010
Authorities in Scotland and Northern Ireland only	3.25 µg/m ³	running annual mean	31.12.2010
1,3-Butadiene	2.25 µg/m ³	running annual mean	31.12.2003
Carbon monoxide Authorities in England, Wales and Northern Ireland only	10.0 mg/m ³	maximum daily running 8-hour mean	31.12.2003
Authorities in Scotland only	10.0 mg/m ³	running 8-hour mean	31.12.2003
Lead	0.5 µg/m ³ 0.25 µg/m ³	annual mean annual mean	31.12.2004 31.12.2008
Nitrogen dioxide ^{b,e}	200 µg/m ³ not to be exceeded more than 18 times a year 40 µg/m ³	1 hour mean annual mean	31.12.2005 31.12.2005
Particles (PM₁₀) (gravimetric) ^c All authorities	50 µg/m ³ not to be exceeded more than 35 times a year 40 µg/m ³	24 hour mean annual mean	31.12.2004 31.12.2004
Authorities in Scotland only ^d	50 µg/m ³ not to be exceeded more than 7 times a year 18 µg/m ³	24 hour mean annual mean	31.12.2010 31.12.2010
Sulphur dioxide	350 µg/m ³ not to be exceeded more than 24 times a year 125 µg/m ³ not to be exceeded more than 3 times a year 266 µg/m ³ not to be exceeded more than 35 times a year	1 hour mean 24 hour mean 15 minute mean	31.12.2004 31.12.2004 31.12.2005

b. The objectives for nitrogen dioxide are provisional.

c. Measured using the European gravimetric transfer standard sampler or equivalent.

d. These 2010 Air Quality Objectives for PM₁₀ apply in Scotland only, as set out in the Air Quality (Scotland) Amendment Regulations 2002.

e. The annual average and 1 hour average nitrogen dioxides objectives are the same as the EU Limit Values but the EU Limit Values have to be achieved by the 1 January 2010 and maintained thereafter

Additional national particles objectives for England, Wales and Greater London (see table below) are not currently included in Regulations for the purpose of LAQM. The Government and the Welsh Assembly Government however intends that the new particles objectives will be included in Regulations as soon as practicable after the review of the EU's first air quality daughter directive. Whilst authorities have no obligation to review and assess against them, they may find it helpful to do so, in order to assist with longer-term planning, and the assessment of development proposals in their local areas.

Proposed new particles objectives for England, Wales and Greater London (not included in Regulations)

Region	Air Quality Objective		Date to be achieved by
	Concentration	Measured as	
London	50 µg/m ³ not to be exceeded more than 10 times a year	24 hour mean	31.12.2010
London	23 µg/m ³	annual mean	31.12.2010
London	20 µg/m ³	annual mean	31.12.2015
Rest of England and Wales	50 µg/m ³ not to be exceeded more than 7 times a year	24 hour mean	31.12.2010
Rest of England and Wales	20 µg/m ³	annual mean	31.12.2010

Efforts to achieve these objectives should be focussed on locations where members of the public are likely to be exposed over the averaging period of the objective. The table below summarises the locations where these objectives should and should not apply.

Typical locations where the objectives should and should not apply			
Averaging Period	Pollutants	Objectives <i>should</i> apply at ...	Objectives <i>should not</i> generally apply at ...
Annual mean	1,3 Butadiene Benzene Lead Nitrogen dioxide PM ₁₀	All background locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, libraries etc.	Building facades of offices or other places of work where members of the public do not have regular access. Gardens of residential properties. Kerbside sites (as opposed to locations at the building facade), or any other location where public exposure is expected to be short term
24-hour mean and 8-hour mean	Carbon monoxide PM ₁₀ Sulphur dioxide	All locations where the annual mean objective would apply. Gardens of residential properties.	Kerbside sites (as opposed to locations at the building facade), or any other location where public exposure is expected to be short term.
1 hour mean	Nitrogen dioxide Sulphur dioxide	All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (e.g. pavements of busy shopping streets). Those parts of car parks and railway stations etc. which are not fully enclosed. Any outdoor locations to which the public might reasonably be expected to have access.	Kerbside sites where the public would not be expected to have regular access.
15 minute mean	Sulphur dioxide	All locations where members of the public might reasonably be exposed for a period of 15 minutes or longer.	

Appendix 2

AQMA Order for the Woodbridge Junction within the Suffolk Coastal District

Environment Protection Act 1995, Part IV section 83(1)

Suffolk Coastal District Council

Air Quality Management Area Order

The Suffolk Coastal District Council Air Quality Management Area ORDER No 1, 2006

Suffolk Coastal District Council, in exercise of the powers conferred upon it by Section 83(1) of the Environment Act 1995, hereby makes the following Order

This Order may be referred to as '**The Suffolk Coastal District Council Air Quality Management Area Order No 1, 2006**', and shall come into effect on the **3rd April 2006**

The area shown on the attached map hatched in red is to be designated as an air quality management area (the designated area). **The designated area incorporates properties on the Western side of the Thoroughfare and Melton Hill arm of the junction with Lime Kiln Quay Road, in Woodbridge, Suffolk.**

The map may be viewed at the Council Offices, at Melton Hill, Woodbridge, between the hours of 08.45am to 5.15pm Mondays to Thursdays, and 08.45am to 4.45pm on Fridays.

This Area is designated in relation to a likely breach of the nitrogen dioxide (annual mean) objective as specified in the Air Quality Regulations (England)(Wales) 2000.

This order shall remain in force until it is varied or revoked by a subsequent order.

Dated; this Third day of March 2006

The Common Seal of Suffolk Coastal District Council was affixed in the presence of;

Ian S de Prez

.....

Authorised Officer

And

Simon BurrIDGE

.....

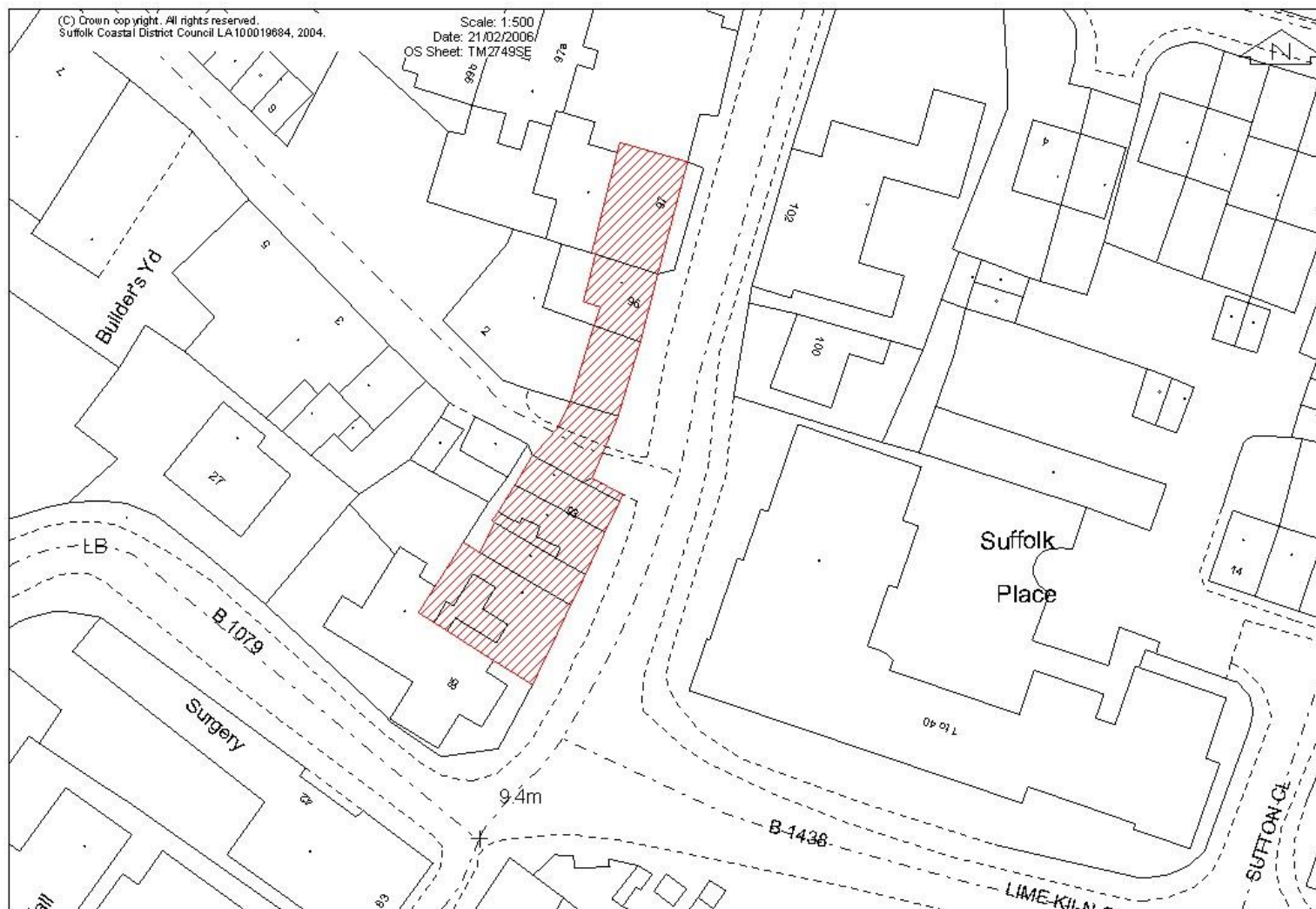
CS

9281

Authorised Officer

Dated 3rd March 2006

THE SUFFOLK COASTAL DISTRICT COUNCIL AIR QUALITY MANAGEMENT AREA ORDER NO 1, 2006



Appendix 3

Maps of Further Assessment of air quality at the Woodbridge Junction AQMA

Reproduced from SCDC's Further Assessment report, October 2007

Figure 5.1 Modelled contours of annual mean NO₂ concentration at the Woodbridge junction for 2006
(See Table A2.3 in Appendix 2 for the names and locations of the numbered monitoring sites)

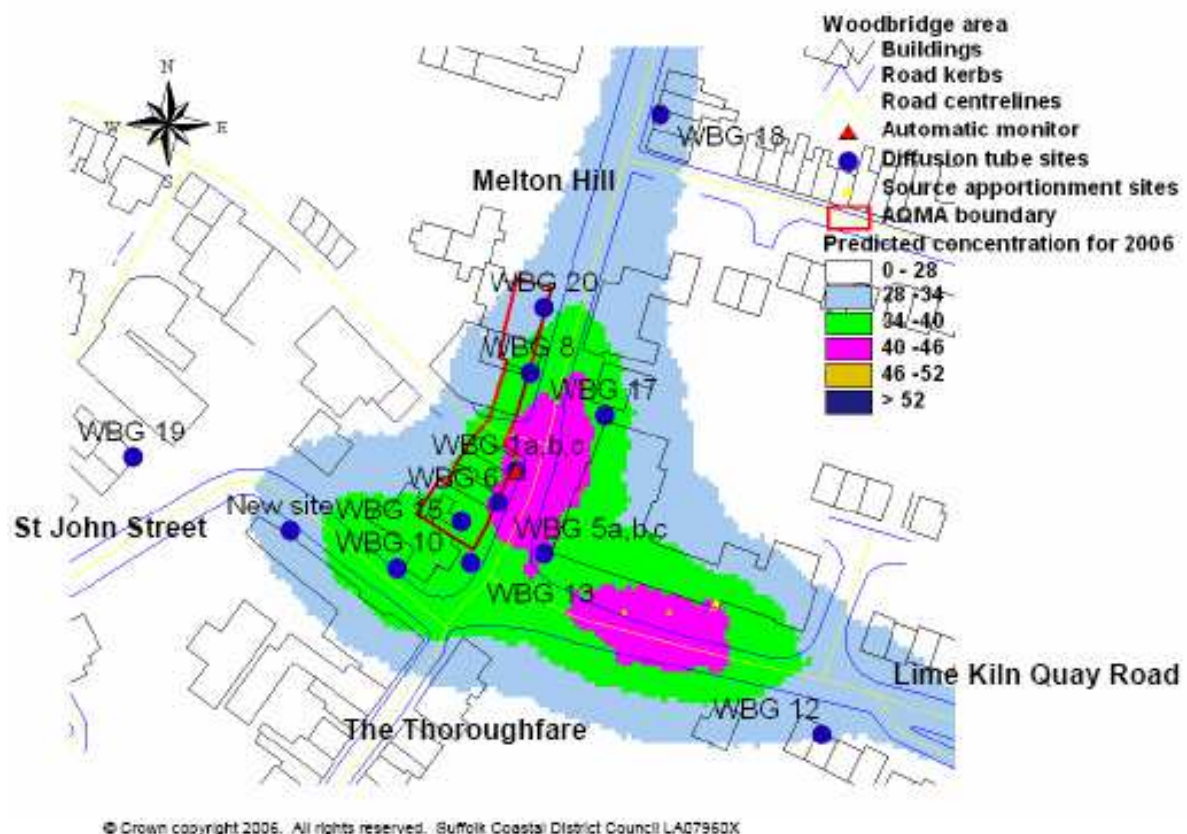
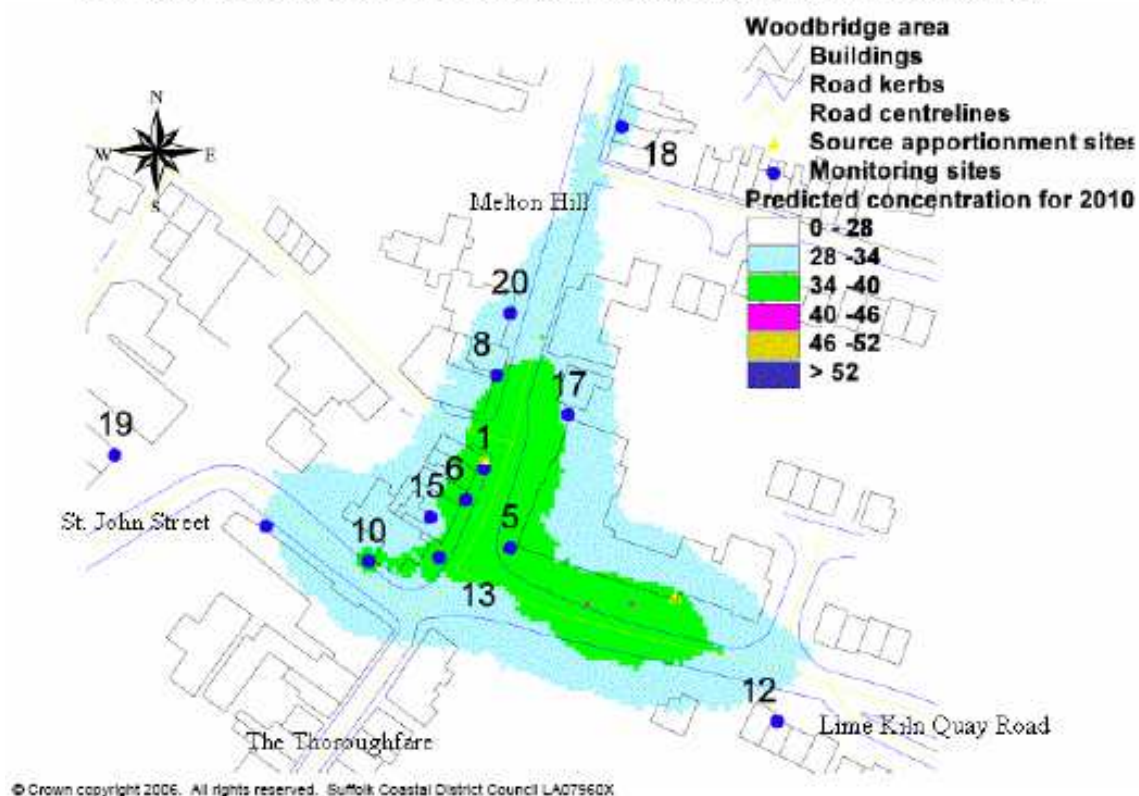


Figure 5.2 Modelled contours of annual mean NO₂ concentration at the Woodbridge junction in 2010
(See Table A2.3 in Appendix 2 for the names and locations of the numbered monitoring sites)



Appendix 4

Assessment methods

The steering group identified a wide range of options during the initial assessment, these are listed in Appendix 5. These options have been assessed in more detail against a range of criteria in order to determine which ones to include within the Action Plan. The following paragraphs outline how the assessment has been made.

5.1.1 What is the option?

The steering group has listed the potential options and made comments on the potential effects, pros and cons associated with the option. The information given here along with the source apportionment information in chapter 3 is the basis of the assessment.

5.1.2 What is being proposed?

The options are defined in specific terms where possible. For the detailed assessment each option has been defined in sufficient detail to understand the change, from the current situation, that is being proposed.

Typically the proposal is either to change the traffic in the AQMA or traffic more generally across Woodbridge. The effects on traffic in these locations are defined as 'fewer vehicles' or 'fewer vehicles queuing' or 'lower emitting vehicles'. In other cases the focus is considered to be 'strategic' i.e. developing those options may not have direct impacts on the problem but improve the District and County Councils capacity to make the correct decision on managing air quality in the AQMA and across Woodbridge.

5.1.3 Potential air quality impact

This is a key assessment in that the Air Quality Action Plan must focus on prioritising options that improve air quality most effectively. The assessment is complex in that the detailed assessment of any given option could normally be subject to a study of its own requiring significant resources.

Ideally, a traffic model for Woodbridge junction and Woodbridge would be developed to a stage where it would be possible to quantitatively assess the potential air quality impacts of any given options. However, this is not currently the case. Therefore, a semi-quantitative assessment relying on a level of judgement has been adopted. The method used is described below:

1 What proportion of emissions would be affected by the option?

The option description, comments, focus of the option and source apportionment have been used to define how much of the contribution to the air quality issue at Woodbridge junction that this option potentially addresses estimated as a percentage.

2 Realistically how much of the traffic would change due to the option?

Beyond the potential influence there must be consideration of the realistic impact of the proposed option. Road closure would obviously remove all traffic emissions and hence realistically remove 100% of all local road transport emissions. However, this may be acceptable in very few cases. Options of the kind listed for Woodbridge are mainly more modest in ambition. For example, there are many options to improve flow through Woodbridge junction by various means. Such non-regulatory interventions are likely to have limited impact since the junction-users will still be left to decide whether to use the junction or not.

The level of realistic change has been defined as being:

- Neutral – basically changing no traffic
- Very small – changing around 1-2% of traffic

- Small – changing 2-5% of traffic
- Moderate – changing 5-10% of traffic
- Large – changing more than 10% of traffic

3 Therefore what level of reduction in emissions might result from the option?

The proportion of emissions potentially affected by the option and the view on how far they could be changed by the option (steps 1 and 2 above) are combined to express an overall assessment of the amount of local transport emissions at Woodbridge junction that may realistically be reduced by the option.

4 How significant might the air quality improvement be as a result?

The source apportionment and review and assessment information presented in this report indicates that a 16% reduction in local emissions at Woodbridge junction are required based on 2006 figures to achieve the air quality standard. If transport emissions and air quality continue to improve then by 2010 the risk that the annual mean air quality standard for NO₂ will be exceeded will be lower. Before then a 10% reduction in emissions may be required to achieve the standard. The District Council review and assessment activity between now and 2010 will continue to monitor this situation.

In this context even a 1-2% reduction in emission can be seen as a significant step towards achieving the air quality standard in the AQMA. The District Council could potentially implement several measures with this level of influence to achieve an overall 10% reduction in emissions.

For the purpose of the air quality assessment the result of the realistic intervention has been assessed as having a potentially:

- Neutral local air quality benefit if the realistic intervention is 0% or worse
- Low local air quality benefit if the realistic intervention is 1%
- Medium local air quality benefit if the realistic intervention is 2-5%
- Large local air quality benefit if the realistic intervention is >5%

The result of the assessment is to define the potential air quality benefit of an option (in terms of making progress towards the air quality standard in the AQMA) as ranging from neutral to relatively large.

5.1.4 Cost-effectiveness assessment

Implementation costs

The potential implementation costs of each option are assessed as follows:

- Cost neutral
- Low costs (up to £20k annually e.g. for small surveys or campaigns or other options using current resources)
- Medium costs (up to £200k annually e.g. for small traffic management schemes)
- High costs (above £200k annually e.g. for new infrastructure)

The assessed costs attempt to include the costs to vehicle operators as well as to the District and County Councils. Costs already allocated or spent by the District and County Councils are not included in this assessment and would therefore be described as 'neutral'.

The effectiveness of each measure in improving air quality is compared to the implementation costs in the matrix provided overleaf.

In this matrix the assessed implementation costs and potential air quality impacts have been given a weighted score. The product of the weighted scores for each option is calculated. The results can be interpreted as follows:

- If the product is high (8 or more) then the measure is more cost-effective (significant impacts for the cost involved) and perhaps favourably cost-effective.
- If the product is medium (between 3-7) then the measure is in the medium range of cost-effectiveness
- If the product is low (2 or less) then the measure is less cost-effective (small impacts for the cost involved) and perhaps unacceptably poor in cost-effectiveness terms.

AQ benefit \ Cost	Rating	Neutral	Low	Medium	High
Rating		0	1	2	3
Neutral	4	0	4	8	12
Low	3	0	3	6	9
Medium	2	0	2	4	6
High	1	0	1	2	3

The final cost-effectiveness value is sensitive to changes in the assumptions of how effective a measure might be in reducing emissions and how costly it is.

Note that a score of 4 for one option and a score of 8 for another does not necessarily mean that the former option is exactly two times more cost-effective. This method only estimates the *relative* cost-effectiveness of options rather than their *absolute* values. The method is useful during discussions of the relative priority of different options.

5.1.5 Potential co-environmental benefits

In this assessment other environmental benefits are highlighted.

- Other pollutants: The likely effect on local PM₁₀ concentration is assessed as being an overall reduction or a local reduction perhaps with emissions being relocated elsewhere in Woodbridge.
- Greenhouse gases: The likely effect on greenhouse gas emissions is assessed as being an overall reduction or a local reduction perhaps with emissions being relocated elsewhere in the District.

Without detailed information on the true impacts of the options these assessments rely on judgement and therefore any issues have been raised within the 'comments' column in the assessment results in Appendix 5.

5.1.6 Potential risk factors

In this assessment risk factors are highlighted. These may be looked at more closely within a Strategic Environmental Assessment of any option implemented. At this stage it is simply highlighted whether it is likely that the option:

- may relocate emissions and hence lead to worsening air quality elsewhere
- may require a change in land use
- may place limits on pace of development or their costs

Without detailed information on the true impacts of the options these assessments rely on judgement and therefore any issues have been raised within the 'comments' column in the assessment results in Appendix 5.

5.1.7 Potential social impacts

Potential social impacts are highlighted. These may need to be examined more closely when developing the options further. At this stage it is simply highlighted whether it is likely that the option would potentially:

- Provide health benefits in terms of lower exposure to pollutants or increased mobility
- Increase road safety
- Improve accessibility

Without detailed information on the true impacts of the options these assessments rely on judgement and therefore any issues have been raised within the 'comments' column in the assessment results in Appendix 5.

5.1.8 Potential economic impacts

Potential economic impacts are highlighted. These may need to be examined more closely when developing the options further. At this stage it is simply highlighted whether it is likely that the option would potentially:

- Improve sustainable development or accessibility in Woodbridge
- Reduce or increase overall travel time
- Impact on deliveries to Woodbridge
- Impact on operator costs and potentially pass these through to passengers or clients
- Require significant re-adjustment to the scheme

Without detailed information on the true impacts of the options these assessments rely on judgement and therefore any issues have been raised within the 'comments' column in the assessment results in Appendix 5.

5.1.9 Who is the appropriate authority for implementing an option?

A single authority would be responsible for leading on developing and implementing Action Plan measures or in attempting to influence other agencies to take such action. Each option has been identified as being within the responsibility of the following authorities:

1. Suffolk Coastal District Council (SCDC)
2. Suffolk County Council (SCC) via the Local Transport Plan (LTP)

Appendix 5

Assessment results

The following tables present the summary results of the assessments

Assessment of options to reduce NO₂ concentrations at the junction of Lime Kiln Quay Road, Thoroughfare and St. John's Street, Woodbridge

Key to Cost and Benefit Ratings:

Cost

Neutral = £0
 Low = £0 - £20,000
 Medium = £20,000 - £200,000
 High = >£200,000

rating score of 4
 rating score of 3
 rating score of 2
 rating score of 1

Benefit

Neutral = rating score of 0
 Low = rating score of 1
 Medium = rating score of 2
 High = rating score of 3

No.	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
	Parking - car parks				
1.	Car parking - assessment of what there is, costs etc.	<p>Little positive impact - car parks located to the southwest of the site so some traffic will use the junction depending on their access route into Woodbridge. Could look at increasing charges for car parks to try and deter car users, number of cars this would remove would be very low and may impact on the Woodbridge economy. Would not be a popular option for the Traders. Alternative ways of getting into town via public transport may not be sufficient to support this.</p> <p>The Economic Regeneration and Development Team at SCDC have undertaken a recent review of car parking in Woodbridge including charges. One of the review findings that may impact on other options for the junction is that there are not enough spaces at peak times.</p>	zero	low	4
2	Use council offices at weekends for free car parking for vehicles approaching from this direction.	<p>Some vehicles from Melton would stop before junction, some from southwest would drive through junction to car park so unsure as to whether positive or negative impact. The Council's Economic Regeneration and Development section have investigated the option of having a chargeable car park. This is not viable at present as the marked car parking spaces are too small for a public car park. They would need to re mark the spaces and the car park would end up with fewer spaces in total. This presents a problem as the car park is already over capacity on some days for employees. The council is undertaking a Green Travel Plan and if as a result of this the number of employee vehicles is reduced they can look at it again. Council car park to be used for 6 months from 18 April 2009 for free parking on Saturdays due to works in Hamblin Road car park.</p>	zero	low	4

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
	Parking - on street				
3	Parking on the street opposite the council offices causes queuing at busy times - remove or reduce this parking. Put in place other measures to ensure traffic speeds do not increase - increase pavement width on one side of the road.	Reducing the parking would have no impact as would still cause queuing. Removing the parking would aid traffic flow near to the junction. It would also increase the speed that traffic clears the junction. A negative impact is increased traffic speed in the area would decrease road safety. Increasing pavement width would help lower speeds. May not be popular option as car parking spaces in short supply in Woodbridge. Local residents using this parking may also object.	low	Medium	6
4	Leave the parking here as it keeps speeds low.	No impact	Not considered further		
5	Resituate parking - move to opposite side of the road to keep traffic away from houses on this side.	Would help reduce speed on approach to the junction and control volume of traffic on approach to signals. Traffic would queue instead up and past Council Offices where receptors are not as close to the road, would hold up the traffic in this area away from the junction. Might make the route less attractive to traffic from the north and reduce traffic flow. May still require pavement widening.	low	medium	6
6	Permit parking in Deben Road	No perceivable effect	Not considered further		
7	Prevent cars/lorries stopping on road - use red road markings as in London and design road markings to help	There is very little evidence of abuse of the current parking restrictions so red marking not required. London red markings can only be used in London so not applicable. Increased policing of current restrictions would solve this problem but be costly. Removing all parking from Melton Hill could increase the speed that traffic flows through the junction but could lead to an increase in overall traffic speed in the area and a decrease in road safety. Would not help reduce traffic volume. Would still need to police abuse of parking restrictions. Pavement widening on the east side would be required to reduce impact of faster traffic on pedestrians.	medium	zero	0

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
	Direction signing – re-routing access from A12				
8	Signing - can this be improved? From the A12 directing people into Woodbridge (remove this), better signing around Woodbridge etc. try to deter through traffic.	<p>Removing signing to Woodbridge from the A12 would not help as signing is needed to direct traffic along the most suitable routes to enter a town. Removing this signing would leave no control over which routes people choose. If the signing for north bound traffic were removed and all traffic signed to use the northern (Woods Lane) junction, all traffic would have to travel through the junction to enter the town. The signing at the southern access has already been changed to indicate 'town centre only' and route traffic for villages along the A12.</p> <p>Signing all southbound traffic via Ipswich Road could reduce traffic through the junction. However, this would have an impact on servicing the Thoroughfare as all servicing vehicles would have to travel through the town to then use the junction to turn left into the Thoroughfare. Would be resisted by residents of Ipswich Road as they already express concern regarding traffic noise and volume. In addition, the increase in traffic volume would have negative impact on cyclists by making the route less attractive and would cause problems for pedestrians as there are limited pavements (no continuous pavement on one side) and few formal crossing points. Would not influence drivers who know the route but would increase journey distances for those unfamiliar with the area - particularly those re-routed from the north-east. There is anecdotal evidence only of traffic using this as a through route. Should traffic surveys indicate otherwise we will rate the option again.</p>	zero	zero	0
9	Actively discourage through traffic by use of 'Local Traffic' only signs prior to the junction at Melton crossroads.	A12 south signs already altered to read 'town centre only'. Could achieve minor traffic reduction from Melton direction. There is anecdotal evidence only of traffic using road as through route. Should traffic surveys undertaken in the future indicate otherwise, we will rate this option again.	low	low	3
10	Look into Satellite Navigation systems - are they sending people via Woodbridge to get to Martlesham?	There are anecdotal reports on SatNav sending vehicles through the town rather than via the A12/A1152. SatNav companies could be approached to remove as route and re-route along Woods Lane. May achieve some traffic reduction. SCDC to approach SatNav companies to investigate this option.	zero	medium	8

	Option description	Comments	Cost Rating	Benefit Rating	Cost/benefit rating
11	The B1438 in Woodbridge is part of the County Designated Lorry Route and is therefore on satellite navigation systems as a recommended route - can this be undesignated.	The B1438 in Woodbridge is part of the County Lorry Route Network and is designated as a local distributor route. i.e. it is the route local lorries are expected to use for local deliveries/destinations within the immediate area. It would be shown on satellite navigation systems as such. Previous traffic surveys have shown the level of lorry traffic in the area to be low, which indicates that the route is primarily used as intended, for local deliveries rather than as part of a route to destinations further afield. If it were undesignated, there would be no approved route for lorries servicing premises within Woodbridge, therefore leaving distributors with no guidance as to which roads to use. This may lead to lorries diverting onto much less suitable roads within the town which is not acceptable.	Unacceptable		
12	Only encourage access to Woodbridge via Ipswich Road - do this via signing	Could possibly reduce the traffic through the junction if A12 southbound traffic were also directed to use Ipswich Road for access to the town. This would have an impact on servicing the Thoroughfare as all servicing vehicles would have to travel through the town to then use the junction to turn left into the Thoroughfare. Would be resisted by residents of Ipswich Road as they already express concern regarding traffic noise and volume. In addition, the increase in traffic volume would have negative impact on cyclists by making the route less attractive and would cause problems for pedestrians as there are limited pavements (no continuous pavement on one side) and few formal crossing points. Would not influence drivers who know the route but would increase journey distances for those unfamiliar with the area - particularly those re-routed from the north-east.	low	low	3
13	Must encourage access to Woodbridge via Ipswich Road and indicate that North Hill is for local traffic only.	As for 12 above	low	low	3

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
14	On leaving the Turban centre traffic should be directed right towards the 'A12' and 'onward journeys' to cut down the traffic build up on Lime Kiln Quay Road.	This may discourage non-local drivers from using the junction and could reduce some of the flow through the junction. However, local drivers would make the easier left turn and would ignore the signing. It would increase journey distances by 1.5 miles and increase traffic on Ipswich Road. May also cause some confusion for any drivers who did not know the area and had entered Woodbridge from the North.	low	low	3
	Direction signing - car parks				
15	Signing - can this be improved? Signing for car parks	Improved car park signing can prevent wasted trips but unlikely to affect traffic through junction - traffic from north east does not reach car parks until through junction. Some car park signs on Ipswich Road approach into Woodbridge are quite small and could be missed. Better signing to the Turban Centre car park when approaching from Ipswich Road direction may prevent any tourist traffic ending up at the junction if they have missed the other car parks on the way in. Could also look into putting a sign within the Turban centre car park pointing out where the other car parks are in Woodbridge should this one be full.	low	low	3
	Traffic calming				
16	Actively discourage through traffic by: traffic calming, speed cameras/radar	Traffic calming would not be considered on a main distributor road used for emergency access, bus route. Would be very expensive and is likely to create rat runs through the town - safety issues. If we slow HDVs the emissions from each will increase. There is anecdotal evidence only of traffic using this as a through route. Should traffic surveys indicate otherwise we will rate the option again.	high	low	1
	Speed limits				
17	Actively discourage through traffic by: 20mph at schools	No schools on the route, '20's Plenty' already being rolled out for schools. No impact on junction.	Not considered further		

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
18	Actively discourage through traffic by: increase the speed of Wood's Lane traffic and by-pass traffic etc.	Speed limit on Woods Lane difficult to increase as is residential for part of the route. Raising speed limit A12 may make the route more attractive but it would affect residents and safety on approach to traffic signals/cycle crossing. Speed limit recently decreased for school safety and so we cannot increase this. See also option 58 for comments. Limited effect on traffic volume.	low	low	3
19	Decrease the speed limit in the area to discourage short cut through Woodbridge. 20 mph suggested, also speed cameras and fines.	At peak times, traffic speeds are low due to traffic volume. If it were possible to introduce a lower limit on the main route through the town in isolation, it would likely lead to rat running through untreated roads. 20mph speed limits or zones can only be introduced if the actual speed is reduced to 24mph or less. If the speeds are higher than this, traffic calming has to be provided to bring the speeds down (see comments under option 3b above). In addition, 20mph speed limit zones are intended to allow peripheral roads to not be limited to allow for emergency access, public transport routes, deliveries etc. Introducing a lower limit would require additional signs in a sensitive area. Unlikely to reduce traffic volumes at peak times. May reduce some off peak traffic. There is anecdotal evidence only of traffic using this as a through route. Should traffic surveys indicate otherwise we will rate the option again.	high	low	1
20	Reduce speed of cars on Melton Hill - also install speed cameras	Traffic speeds can be in excess of the speed limit but this is not an area that would attract safety cameras - no record of injury accidents. As a main route between Woodbridge and Melton, an emergency access route, and a bus route, it would not attract traffic calming to reduce speed. Unlikely to effect use of road.	medium	low	2
	Traffic signals				
21	Alteration of traffic light timings at Melton crossroads to deter through traffic entering Woodbridge.	Timing of newly installed traffic lights has been set to make them more efficient at maintaining/prioritising flows on A1152. Action to deter traffic entering Woodbridge from the south east would also effect traffic heading towards the A12, reducing the attractiveness of this as a route.	low	zero	0
22	Put in a right hand turning/queuing lane on Melton Hill so cars can get past to filter left (could then re-jig the light timings again to assist other arms of the junction).	Would reduce some of the queuing at the junction. If combined with ban on right turn into St John's/additional access restrictions on Thoroughfare, could remove some delays. May need land from adjacent flats as pavement narrow. It would appear that often there is only one vehicle at the front of the queue on Melton Hill wishing to either go straight on or turn right which holds up the rest of the traffic. If there is a possible way to allow left filtering vehicles to get round any queuing vehicle(s) it could have a positive impact on queues and the traffic flow.	medium	medium	4

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
23	Remove the lights and put in a mini roundabout - will need pedestrian crossings further along each arm of the junction.	Would reduce delays at the junction for the major traffic movements but increase delays on St Johns Street. May well encourage/increase use of the junction as could be perceived as quicker route than using A1152/A12. This would remove any benefits by increasing the traffic volume using the junction. Formal pelican crossings would be needed on Melton Hill and St Johns Street, however, with narrow pavements, this may not be possible to achieve. Pedestrian crossings would have to be set back along the arms of the junction to achieve visibility, diverting people from their preferred routes. To still be attractive for pedestrian use, they would still be located in the 'problem' area. Extra delays would be introduced in these areas as the crossings would be too far apart to be linked i.e. they would operate independently rather than at present as part of the traffic signal cycle. Many elderly pedestrians in area would be disadvantaged by them. SCC targets of increasing walking would be affected. A mini roundabout requires a lot of road space to accommodate large vehicles such as buses. At a junction with no traffic control this creates problems for cyclists due to possible increases in traffic speed and less lane control. Roundabouts are known to be more hazardous for cyclists to negotiate than other junction types.	medium	low	2
24	Do a trial mini roundabout using signs	See 14a. Could not be introduced using temporary measures as there would be safety issues for both motorists and pedestrians. Not feasible.	Unfeasible		
25	Move pedestrian crossings further along each arm	This would introduce additional delays to the operation of the signals, as traffic would be delayed in two locations both entering and leaving the junction. The current configuration allows pedestrians to cross as part of the signal cycle.	medium	low	2
26	Ban right turn from Melton Hill into St Johns Street	Right turn traffic volume is similar to straight on traffic but only forms approximately 8% of flow entering the junction from Melton Hill. Likely to be spread more evenly during the day as no time restriction. If this move were banned, displaced vehicles likely to use Sun Lane, as most are likely to be residents. Any congestion caused in Sun Lane would impact on traffic using the junction as vehicles may queue on Melton Hill waiting to turn into Sun Lane. Traffic flow would increase on an unsuitable route but delays caused to traffic travelling towards signals would reduce queues at the signals. The use of Sun Lane may have to be restricted to access to residential properties only i.e. no use as a through route. To restrict all access would have a large impact on local residents and a detour of approximately a mile to reach their properties, using Pytches Road/Castle Street. Traffic may choose to travel straight on more thus causing delays anyway.	low	low	3
27	Increase timing of left hand filter from Melton Hill to encourage left hand turns	The filter currently runs during all cycles where it is safe to do so. Increasing the time would have little effect as vehicles can only filter left while no vehicles in front are waiting to turn right or go straight on.	low	low	3

	Option description	Comments	Cost Rating	Benefit Rating	Cost/benefit rating
28	Increase the time allowed for pedestrians to cross the junction	The current timings allow pedestrians enough time to cross in safety. Adding time would cause traffic to queue for longer and could exacerbate air quality problems. Negative impact on air quality.	low	zero	0
29	Adjust traffic sensor on Melton Hill as it appears to be broke	Signals were checked and no error found. Timings have been altered to make signals more efficient. No action required.	Already implemented		
30	Pedestrian sequences hold up traffic especially at weekends - get a policeman to direct traffic at the weekend to prevent queues building up and let pedestrians across less often.	Could increase efficiency of through traffic at peak time but would not attract police support as not a priority for police action. Would be costly as on-going police presence required. Excessive delays for pedestrians likely to lead to people crossing against signals with consequent safety issues. Would not be in line with encouraging walking to reduce use of private transport. Would not reduce traffic volume. Option 31 outlined below would effect the same outcomes and is more realistic.	high	low	1
31	Remove the ability to turn right (see also 14f) or go straight on from the direction of Melton Hill	Would reduce queuing at the lights, especially when left turn filter running. Would reduce traffic flow as people would find other routes, which would help air quality at this junction. However, banning the straight on manoeuvre would impact on operation of the Thoroughfare. Either traffic would have to travel along LimeKiln Quay to enter, increasing traffic from this direction, or flow in Thoroughfare may have to be reversed. If flow reversed, lights would then have to accommodate an additional phase to allow traffic to exit the Thoroughfare. Flow into Thoroughfare is light during the day due to access restrictions in force (8% of total flow entering junction from Melton Hill).	low	medium	6
32	Stop the right turn from St John's Street into the Thoroughfare	Traffic flows on St John's Street are approximately a third of those on Melton Hill/Lime Kiln Quay and air quality on the road is currently within the standards. About 7% of the traffic from St Johns Street turns right into the Thoroughfare. However, if this were prevented, motorists are likely to then use Sun Lane, turn right and add to the traffic on Melton Hill approach. This would not alter the traffic using the area of the junction where the air quality problem exists (the Melton Hill arm) and have no impact on air quality.	low	zero	0
33	Alter the filter lights so that they can be seen better	No evidence of motorists not being able to see lights however, some incidents of drivers at front of queue not realising the filter has come on but not significant.	low	zero	0

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
34	Remove traffic lights and have an enter in turn system, move the pedestrian crossing elsewhere	Would operate very similarly to a roundabout - see 23	low	low	3
35	Give more time to Lime Kiln Quay Road traffic to eliminate queuing here.	Lights have been altered to move traffic efficiently through the junction. Allowing extra time for Lime Kiln Quay could delay Melton Hill, especially if the traffic turning left on the filter were behind vehicles waiting to turn right or go straight on. Improving efficiency through the signals would not reduce overall traffic flow. Need to monitor efficiency of signals. Air quality on Lime Kiln Quay Road is within the standards set and therefore any alterations which would increase queues in the area of concern (Melton Hill) would have a negative impact. A more successful solution may be a system to detect queue build up on whichever arm of the junction and to make adjustments to traffic light timings accordingly – see Option 37.	low	zero	0
36	Traffic lights should be altered on Saturdays to reflect long queues that build up on Lime Kiln Quay Road	Modern traffic signal installations allow signals to be programmed to react to changes in traffic flow and adjust the light timings accordingly. Such a system could improve the efficiency of the lights to reduce queuing. However, increasing the efficiency of the signals could make this a more attractive route to drivers and increase the volume of traffic using the junction. May be helpful in conjunction with other action to hold up traffic elsewhere. Air quality on Lime Kiln Quay Road is within the standards set and therefore any alterations which would increase queues in the area of concern (Melton Hill) would have a negative impact. A more successful solution may be a system to detect queue build up on whichever arm of the junction and to make adjustments to traffic light timings accordingly – see Option 37.	medium	low	2
37	Install queue detectors on signals to alter timing changes to reduce queues on the junction of Lime Kiln Quay Road, Thoroughfare and St John's Street	Such a system would reduce queue lengths and improve the efficiency of the lights. However, increasing the efficiency of the signals could make this a more attractive route to drivers and increase the volume of traffic using the junction. May be helpful in conjunction with other action to hold up traffic elsewhere. It is intended to install a queue detection system called MOVA at the lights during summer 2009.	low	medium	6
38	Replace pedestrian crossing at lights with a puffin crossing so that it can detect whether people are waiting to cross or not and change the phasing of the lights accordingly	Would reduce interruptions to the signals by unnecessary pedestrian calls i.e. where someone has pressed the call button but subsequently crosses in a gap in the traffic or where the call has been put in by someone walking past with no intention of crossing. Would reduce driver frustration. No evidence that this occurs frequently at the junction.	medium	Low	2

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
39	Reconfigure the junction so that traffic can only go left from Melton Hill, right and straight on from Lime Kiln Quay Road, and reverse the flow in the Thoroughfare	Traffic from Melton Hill and Lime Kiln Quay Road could flow together, removing the need for one of the traffic signal cycles, except for when there is a need for the pedestrian crossing to operate. However, there would still be a need for traffic to exit St Johns Street, so this cycle would have to remain (the right turn from St Johns Street would be removed as traffic would not be able to enter the Thoroughfare). However, traffic queues would be introduced on the Thoroughfare with traffic waiting to exit, which would mean that an additional cycle would have to be introduced to allow this traffic to exit. The arrangement would reduce traffic queues caused by traffic seeking to go straight on or right from Melton Hill but the additional phase in the signals for Thoroughfare traffic may well negate this benefit. Detailed junction modelling would be needed to see if this would have any effect on air quality.	medium	low	2
	Public transport				
40	Park & Ride scheme from Woodbridge Airbase going into Woodbridge for vehicles from the peninsula.	Additional bus services would remove some vehicles entering Woodbridge and possibly some using the junction. All buses would travel via the junction and add to emissions here so would depend on how many cars the buses took off the road as to whether this has a total positive or negative impact. Would need a bus frequency of every 10-15 minutes so costly.	high	Low	1
41	Use smaller buses for routes that go via this junction	Size of buses tends to be commensurate with their use and which route the buses subsequently link into. Also, companies tend to purchase stock that can be used on various routes. Likely to have little effect as engine emissions very similar between small and larger buses. More important is the age of the bus and not the size so need to target this – see Option 43.	high	zero	0
42	Park and Ride scheme into Woodbridge from A12 - maybe even tie in with the Martlesham Park and Ride	Would help reduce overall traffic in the town from visitors/those working in the town travelling from the south and is a possibility. Buses from this site wouldn't use the junction as would enter and exit from the South. As most parking is located south of the junction, it would have little effect on the junction as private traffic would not have travelled via this direction.	medium	zero	0
43	Work in partnership with Bus Operators and the Passenger Transport Unit to investigate improvements to buses using the junction.	Option of setting up a Bus Quality Partnership has been investigated and does not appear to be the best way forward for Woodbridge. Instead work with the Bus Operators to see if anything can be done to help reduce emissions at the junction (cleanest buses on fleet used on routes that go through the junction), and work with Passenger Transport unit at Suffolk County Council to promote bus patronage and look at options regarding future bus contracts.	low	medium	6

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
44	Increased information and public awareness regarding public transport – i.e leaflet drops	Passenger Transport Officer for SCC advised that public awareness is currently poor, there is a website but no-one knows about it. Could do a leaflet drop to all houses at a low cost or other publicity campaigns. Could try and encourage more people onto public transport this way.	low	low	3
45	Increased information and public awareness regarding public transport – 'Individualised travel planning / marketing scheme'.	Passenger Transport Officer for SCC advised that public awareness is currently poor. This involves teams of people who go door to door armed with timetables etc and spend time with residents working out alternatives to car travel for them. If done correctly has been seen to produce reduction in car use by 10-15% in some areas.	high	medium	2
46	Divert traffic from the north and the peninsula onto the train at Melton to get into Woodbridge	If a concession was offered to local residents to park at Melton and get the train into Woodbridge we could reduce traffic entering Woodbridge. Would need to increase parking at the station and increase the train service as currently is not a viable option. Are plans to look at train station at Melton and improve its use anyway.	medium	low	2
	Other restrictions				
47	Ban motorbikes and large vehicles from using the junction/keep heavy traffic out of Woodbridge.	HGV's need to use the junction to service the Thoroughfare and deliver local supplies therefore we would not be able to ban them from using the junction. Could put on a ban and allow local deliveries only but this would be the majority of the HGVs anyway. There is no evidence of a significant proportion of through traffic from HGVs. Should any future traffic surveys show that they are significant we will rate this option again. Motorcycles are a very low proportion of the traffic flow. Would be very difficult and costly to police such a ban.	Unacceptable		
48	Reverse the flow in the Thoroughfare	Would remove the turning movements into the Thoroughfare that currently delay some of the vehicles along Melton Hill. Vehicles would still queue on Melton Hill to turn right though. Another phase would have to be added into the signals to allow traffic to exit the Thoroughfare, introducing delays to all the other legs.	low	zero	0
49	No access into St John Street - exit only	Would remove some delays for filtering traffic from Melton Hill but would have no effect on Lime Kiln Quay as straight on traffic does not delay other traffic. If all turns into the road were banned, traffic would increase on Sun Lane, which is not a suitable route for any increase in traffic. The use of Sun Lane would have to be restricted which would have a large impact on local residents and a detour of approximately a mile to reach their properties using Pytches Road/Castle Street. Vehicles would still queue on Melton Hill to go straight on.	low	low	3

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
50	Pedestrianise the Thoroughfare / increase the restrictions to 8am-6pm.	Could only partially be achieved, as access required for servicing shops and by residents. Only allowing access to these would reduce the abuse of the current restrictions and remove some of the turning movements and traffic from the area. Would reduce some of the traffic using the junction, particularly at peak periods. Likely to be objections from traders and disabled groups.	low	medium	6
51	Police the Thoroughfare restrictions better - car park attendants.	Would reduce the abuse of the current restrictions and remove some of the turning movements and traffic from the area. It would initially involve police time and subsequent repeat visits to reinforce the restrictions.	low	low	3
52	Pedestrianise the whole area only allowing residents and deliveries at certain times	Would remove most traffic and may resolve air quality issues at this junction. However would divert traffic onto more minor routes as residents and visitors sought to gain access to the area. Unacceptable volumes of traffic on the other routes would cause congestion problems along these routes, most of which are bordered by residential properties. Access would still be needed for deliveries, public transport and emergency services. Would sever the link between Woodbridge and Melton. Volume of traffic displaced and the extra mileage involved would give a net increase in emissions in other areas and may well have serious implications for the viability of the town's attractiveness for shopping.	medium	Medium / high	5
	New Road build/road improvements				
53	Block off the road at Melton Hill Council Offices so there can be no through traffic.	See option 52 above. Would remove most traffic from the junction. However, HGV's would still need to use route to enter the Thoroughfare for servicing, buses would need to use route. Displaced traffic would have to use narrow unsuitable roads in the town for access. General disbenefit due to increase in vehicle miles. Not practicable.	medium	Medium/ high	5
54	Build a relief road/bypass - possibly following the railway line (assumed parallel to the line).	Would allow the junction to be by-passed. However, may compromise any future duelling of the line to increase the capacity of the rail network. Increased use of the railway is much more sustainable than increasing car use along the A12. Cost of building such a road likely to be very expensive - land, flooding risk etc.	Unfeasible		

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
55	Create an exit from the SDC car park into Deben Road so that council traffic bypasses the junction (would be an exit only and not an entrance)	<p>Would remove some traffic, especially if operated as 'in' mornings, 'out' afternoon. Likely to be expensive - land, construction, may require traffic control at junction with Lime Kiln Quay Road. Extra signals could be used to control queuing on Lime Kiln Quay on the approach to the junction.</p> <p>The Council's Property Services Department and Planning Section looked into this idea many years ago. The Railway Inspectorate had safety concerns regarding times when there would be a number of vehicles entering/ exiting the Council's car park causing queues on Sun Wharf. Queues here could potentially block traffic coming over the level crossings and cars may get stuck on the railway tracks. The Highways authority also had concerns about the junction with Lime Kiln Quay Road and possible queues at peak times. The Council could investigate this option again but it would require a full report which would be costly and the likelihood is that the Railway Inspectorate would again be against the proposal. In addition the Council is currently not sure of the lifespan of the offices at Melton Hill due to the local government review currently being undertaken.</p> <p>The Council has also investigated an exit via the new Deben Mill development but were not granted permission for this from the developers.</p> <p>This is therefore not an option to explore at this time.</p>	Not considered further		
56	Put a mini-roundabout at Pytches Road and Hamblin Road junctions	These could make Melton Hill a less attractive route by introducing delays along the route from Melton traffic signals to Thoroughfare. However, it would make it more attractive for traffic from the Wood's lane roundabout into Woodbridge, seeking to avoid the Woods Lane traffic signals. At Hamblin Road would reduce facilities for pedestrians. At present the signals at this junction introduce gaps in traffic flow leading to the Quayside, increased traffic would be detrimental for pupils walking to the new school.	medium	zero	0
57	Alter the use of Sun Lane so it is not a cut through	This is likely to increase the use of the traffic signal junction as traffic accessing the residential area off Sun Lane would then have to use St Johns Street, adding to the right turning movements and consequently delays to traffic filtering left.	low	zero	0
58	Create a link road from Bentwaters to the A12 that isn't via Melton crossroads	Would reduce vehicles through Melton crossroads (east/west traffic) but would have limited effect on Lime Kiln Quay junction (north/south traffic). Some traffic from Bentwaters probably does use Woodbridge rather than the A12 but a direct link from Bentwaters would do little to remove vehicles from the south east area. The number of vehicles likely to use such a road would be very limited and the cost would be high both in money terms and environmentally. It would be unlikely ever to receive funding.	Unfeasible		

	Plans/policies				
60	Green Travel Plans for Schools - create them where there are none and update existing ones	Rolling programme in county to ensure all schools have a Green Travel Plan by March 2010. New school on Pytches Road has Travel Plan. Evidence of existing reduced vehicle use. Once all schools in area have Travel Plan some reduction in vehicle use. Group being set up to look at schools Green Travel Plans and air quality and how to bring them together, we'll give our support to this for schools in Woodbridge.	low	low	3
61	Increases scrutiny of new planning applications for this area, particularly for housing	Ensure that development is either near sustainable facilities or includes provision for building/linking to them. Use minimum parking standards and include clauses in leases to restrict car ownership. Would slow down the rate of growth in local traffic but would not reduce current traffic. This will be considered through the Local Development Framework but is also on-going under existing Council policies. Consultation with the key people is the critical issue.	low	low	3
62	Create a Green travel Plan for SCDC	Would help reduce some car use, particularly local trips. Would have most impact during peak periods. SCDC Green Travel Plan in early stages of construction.	low	low	3
63	Congestion charging	There is not a significant amount of congestion in Woodbridge to put anything like this in place and there is not a real alternative in the way of Public Transport at this time. If it was only applied to roads that lead to/through the junction it would significantly reduce the amount of traffic but is likely to introduce rat running through other areas of the town unless significant restrictions such as traffic calming are introduced. If introduced on all central roads in the town, it may remove some traffic onto the A12 to circulate the town but is likely to penalise residents. Would be expensive to install and manage.	Unfeasible		
64	Do not allow any more residential development with parking in Woodbridge and only grant permission with non-car use covenants.	Depending on the location of any future housing, this could help restrict long term traffic growth but would have little effect on the current situation. If the housing were aimed at younger buyers it may affect the saleability of property due to the current need to travel to work and lack of suitable public transport links. SCDC Planning Services do not believe that this is a real option, it could be applied to the town centre possibly but not to the wider area.	low	low	3
65	Will the new Army regiments have a Green Travel Plan?	It is unlikely that an area already designated as military will produce a Travel Plan that would be open for public viewing. It would also be difficult to see how regiments would produce a plan for either the serving forces or the families without possible security issues. This is out of our remit, but we can approach them informally to see if they would be willing to put something like this in place.	Not considered further		

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
66	Brief SCDC Planners on Air Quality issues in Woodbridge to increase knowledge - maybe at team meetings	Would help keep issue fresh in the mind and ensure that the impact on Air Quality is considered on planning decisions. Would have little initial direct impact but may help in the longer term. SCDC Planning Services agrees with this option and it could be a topic for Continual Professional Development for Council officers. The main point is ensuring that the consultation processes are in place and working effectively both in relation to individual planning applications and the Local Development Framework.	low	low	3
67	Brief DC Sub-South on Air Quality issues in Woodbridge to increase knowledge	Would help raise awareness of issue and ensure that the impact on Air Quality is considered on planning policy decisions. Would have little initial direct impact but may help in the longer term. The Planning section agrees in principle but thinks that it might be better as a report/presentation to Development Committee or to a joint Development Committee / Green Issues Task Group meeting.	low	low	3
68	Tie Action Plan in with Local Development Framework for the future	Would have little initial direct impact but may help in the longer term by ensuring the traffic impact on the junction was considered. The Planning Section think that tie-in is probably difficult mainly because their work programme seems to be changing all the time and new Regs are expected which may well change things again. Key issue is consultation.	low	medium	6
	Other/miscellaneous				
69	Seal up the front of the houses in the affected area and fit ventilation from the rear where the air quality is better.	Would remove problem for residents but is unlikely to be seen as an ideal solution by them. Would not reduce problem, only effect monitoring. SCDC to investigate this option with the Public Sector Housing team.	low	low	3
70	Update the postal districts e.g. so Framlingham does not say Woodbridge afterwards - will help to direct delivery vehicles to correct location and not via Woodbridge	SCDC have approached the Post Office who has confirmed that this is not a viable option. The 'Postal Town' acts as a clearing point for a particular district and is the basic unit of the postal delivery system - it is needed to route mail more efficiently. It is a sorting and routing instruction for the Post Office staff and is not designed for any other use. They would only consider a change if it were operationally necessary and in this case it is not and would not be viable. No further action on this suggestion.	Not considered further		

	Option description	Comments	Cost Rating	Benefit Rating	Cost/ benefit rating
71	HGV's from (Connells) Jewsons add to the problem - assess this.	There is anecdotal evidence that lorries servicing the builders yard delay traffic exiting the signal junction as they manoeuvre into Sun Lane. The impact of these vehicles on other use of Sun Lane for access to the residential area should also be considered. Reducing obstruction of the lane may allow more people to use it for access to the residential area but care needs to be taken not to over use this unsuitable road. As servicing vehicles deliver from Rendlesham/Bentwaters area, it may be possible to discuss delivery times/size of vehicles with the distribution depot. Connells recently taken over by Jewsons. SCDC has contacted Jewsons and concluded that nothing voluntary can be done at this time.	Not considered further		
72	Try and decrease general traffic in Woodbridge as it has increased significantly recently.	This would hopefully be the effect of options chosen for the junction. No cost-benefit analysis therefore needed for this in its own right.	n/a	n/a	n/a
73	Full traffic analysis of all of Woodbridge to see whether whole traffic system in Woodbridge needs altering	Would really be required to give base data for traffic routes and where changes could really effect use of signals i.e. actual percent of traffic using the road as a through route. Would also help to identify where traffic may migrate to and what other roads may need action to reduce moving the problem. Relatively expensive to obtain data but useful in giving proper considered analysis of proposed action. No cost-benefit analysis to be undertaken as obtaining relevant traffic data will be part of our remit for taking the Action Plan forward.	n/a	n/a	n/a
74	Look at measures to reduce traffic queues on the A12 (northbound between Ipswich Road and Grundisburgh Road, southbound between Woods Lane and Grundisburgh Road) to make this more attractive as a route round the town.	Traffic queues on the A12 at peak times could make using the B1438 as a through route attractive. Removal or substantial reduction of the traffic queues on the A12 would make this a more attractive route for through traffic and reduce the number of vehicles using the junction. There is anecdotal evidence only of traffic using this as a through route. Should traffic surveys indicate otherwise we will rate the option again.	medium	medium	4

	Option description	Comments	Cost Rating	Benefit Rating	Cost/benefit rating
75	Look at interrupting the traffic flow along B1438 to make this less of an attractive route but not sufficiently to create rat runs along unsuitable routes in the town.	Measures to reduce the attractiveness of this route to through traffic could help reduce the traffic flow and its effect on air quality. However, these interruptions would need to be seen as reasonable and necessary. Building additional pelican crossings along the route would help increase the time taken for traffic to use the route, would help people cross the road, be seen as reasonable by motorists and would not unduly interfere with traffic so that drivers divert from the road onto unsuitable routes. Possible locations - California junction (could also include crossing for cyclists), near the new health centre, near Pytches Road/SCDC offices. There is anecdotal evidence only of traffic using this as a through route. Should traffic surveys indicate otherwise we will rate the option again.	medium	medium	4
76	Tree planting at Suffolk Place to try and break up any recirculation of pollutants in this area and act as an absorbent for some of the pollutants from the vehicle emissions.	It is possible that emissions from vehicles queuing on Melton Hill at the junction are being picked up by the wind and deposited on the opposite side of the road – within the AQMA – causing the elevated levels recorded here. If the wind flow could be broken up by the use of vegetation this may reduce the recirculation of emissions. Would need to use evergreens and also to look into any particular species which can take up NO ₂ . May be possible at Suffolk Place if they were willing but not viable slightly further along the AQMA as the premises border the road here. However, research indicates that in practice this will have a negligible effect.	low	low	2
	Transport Schemes (obtained from LAQM.PG(03)) not included in the list of options already				
77	Testing emissions from cars at the roadside	Could be something that SCDC could bid for Grant funding to do in the future – would be on an informal 'information' basis to start with. Would be hard to find a suitable area to pull over the cars for the test. Will require police presence.	medium	low	2
78	Taxi licensing	SCDC Licensing Section register all taxis in the district. All taxis, in addition to the annual MOT, must have a 6-monthly vehicle check which includes emission testing to the MOT standard. SCDC current standards for mechanical tests are very high and this is deemed sufficient at the current time.	Not considered further		
79	Travel Plans for Businesses	SCC Travel Plan Co-ordinator works with businesses to encourage staff to decrease the number of single occupancy vehicles by encouraging cycling, walking, lift-share etc. If we provide them with a list of businesses in Woodbridge they would be happy to approach them to see if they can help.	zero	low	4

Appendix G: Woodbridge Air Quality Management Area (AQMA) Revocation Assessment

This appendix provides an assessment of air quality in the East Suffolk Woodbridge AQMA and presents the evidence to support its revocation.

Consideration will be given to:

- The monitoring data obtained over a number of years within the AQMA;
- The projected roadside nitrogen dioxide (NO₂) concentration;
- Local and national trends in NO₂ emissions; and
- Local and regional factors that may impact on the AQMA.

Review & Assessment

Part IV of the Environment Act 1995 (the Act) introduced the Local Air Quality Management regime that places a legal duty on local authorities to regularly review and assess air quality in their areas against Air Quality Strategy (AQS) objectives. The AQS objectives for England are set out in the Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002 and are shown in [Error! Reference source not found.](#)

Local authorities must declare an AQMA where any of the AQS objectives are exceeded and subsequently set out the measures they intend to put in place to secure compliance with the AQS objectives under an Air Quality Action Plan (AQAP).

With effective implementation of the Action Plan and national policies aimed at reducing the emission of pollutants it is expected that the air quality within AQMAs should improve to a point that concentrations will remain below the AQS objectives. A revocation of an AQMA can then be formally declared by Order under section 83 of the Environment Act.

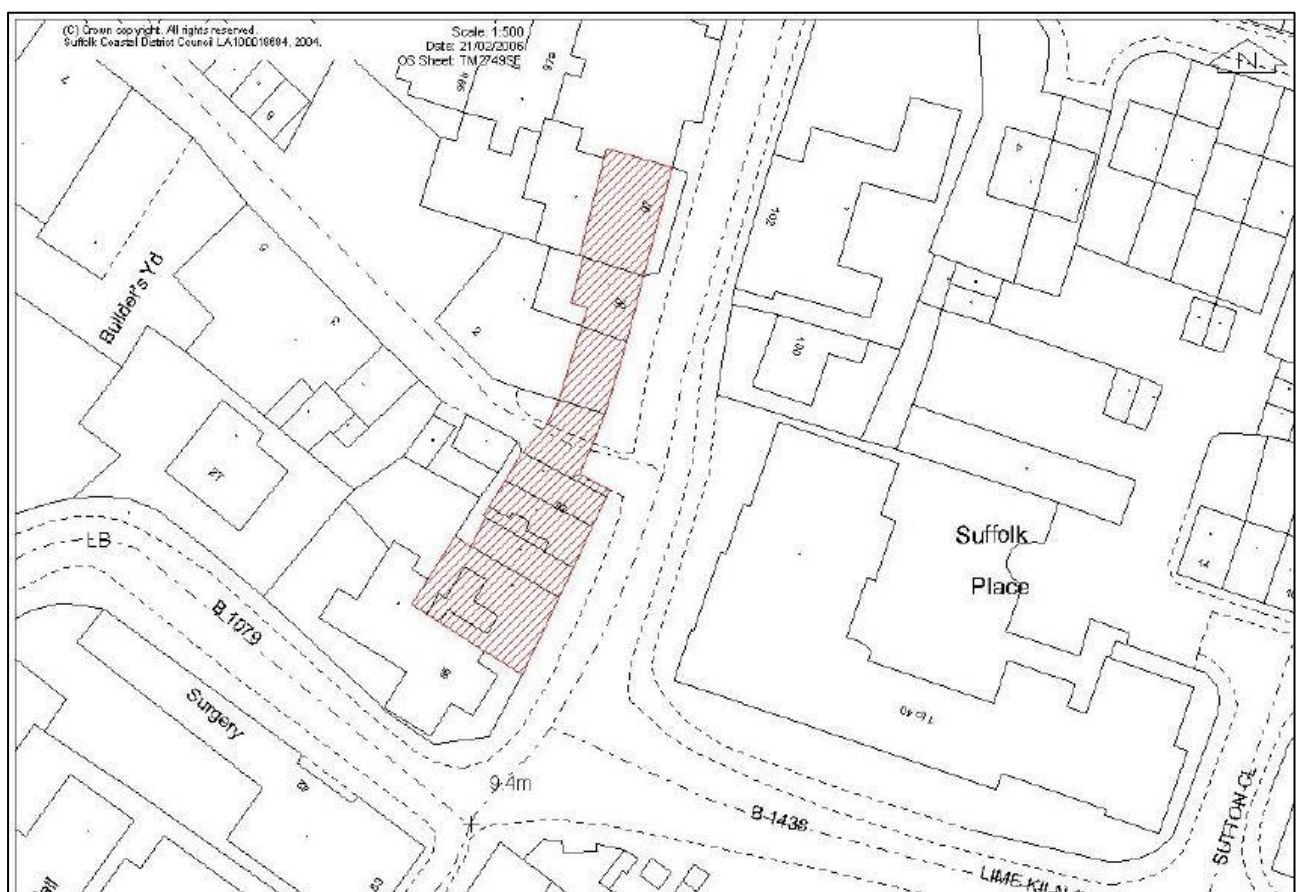
Each year an Annual Status Report (ASR) must be prepared by local authorities detailing the strategies employed to improve air quality and any progress that has been made. Comments made by Defra in relation to the 2020 ASR support the Council's

plans to revoke the Woodbridge AQMA, due to continual compliance with the NO₂ annual mean AQS objective.

Woodbridge AQMA

The Woodbridge AQMA was declared in 2006 to address traffic related NO₂ concentrations in excess of the annual mean AQS objective. The AQMA encompasses six properties on the western side of the Thoroughfare and Melton Hill (B1438), at the junction with Lime Kiln Quay Road (B1438). The extent of the AQMA, as declared under the original order, is demonstrated in Figure G.1.

Figure G.1 - Woodbridge AQMA Extent - Declaration Order No. 1



Revoking an AQMA: The Legal Framework & Guidance

The Environment Act 1995

Section 83 (2b) of the Environment Act (1995) states that an AQMA:

“.....may, as a result of a subsequent air quality review, be revoked by such an order, if it appears on that subsequent air quality review that the air quality standards and objectives are being achieved, and are likely throughout the relevant period to be achieved, within the designated area”.

Statutory Guidance

Guidance on the requirements for revoking an AQMA are set out in statutory guidance LAQM.PG16 and LAQM.TG16.

PG16 states that:

- *“An AQMA can be revoked where a review demonstrates that air quality objectives are being met and will continue to do so. The guidance suggests that monitoring results should have been below national objective levels for 3 years or more prior to revocation.*
- *A copy of the revocation should be submitted to Defra and other statutory consultees and made publicly available to ensure the public and local businesses are aware of the situation. It is expected that the local authority will take the relevant action imposed by the Order within four months following receipt of comments from Defra.”*

TG16 states that:

- *“In some instances, detailed modelling to revoke an AQMA may not be necessary and an AQMA may be amended or revoked following a screening assessment or on the basis of robust monitoring evidence.*
- *Pollutant concentrations may vary significantly from one year to the next, due to the influence of meteorological conditions, and it is important that authorities avoid cycling between declaring, revoking and declaring again, due simply to these variations.”*

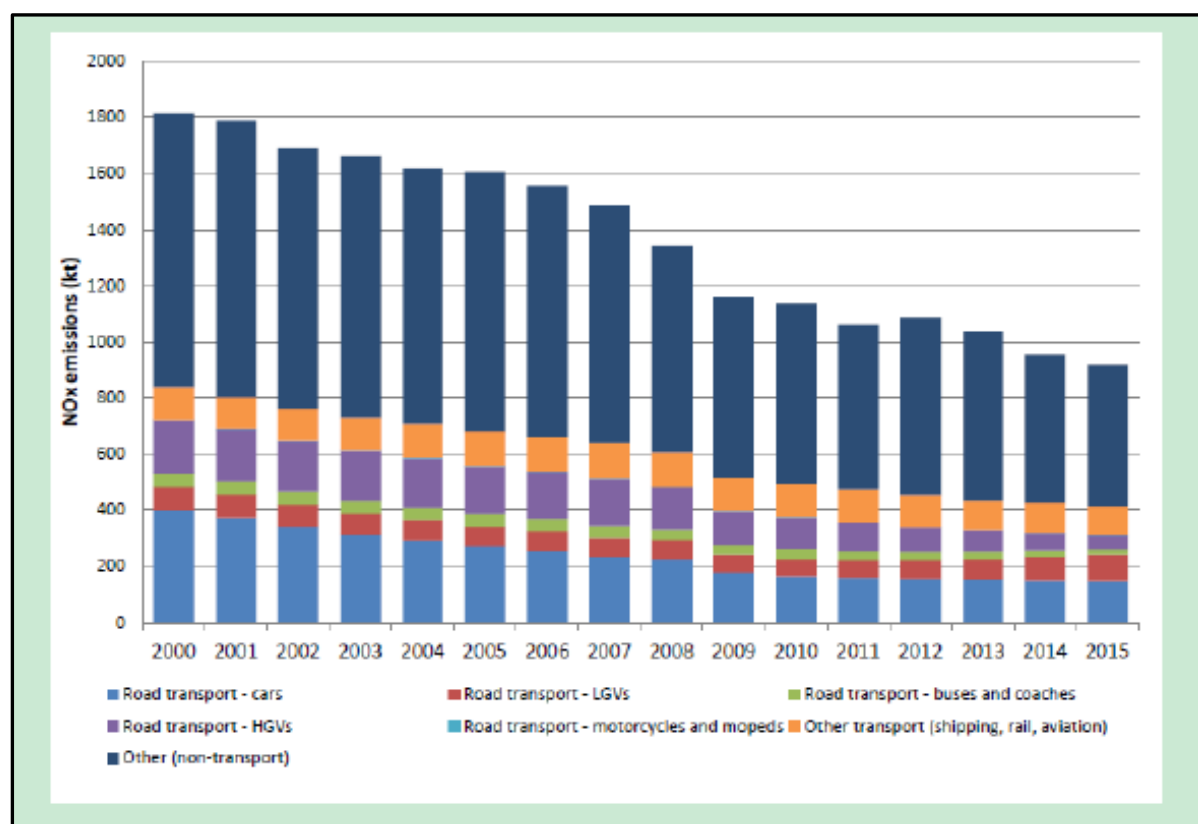
Therefore, before revoking an AQMA on the basis of measured pollutant concentrations, there should be reasonable certainty that any future exceedances

(that might occur in more adverse meteorological conditions) are unlikely. For this reason, it is expected that authorities will need to consider measurements carried out over several years or more, national trends in emissions, as well as local factors that may affect the AQMA, including measures introduced as part of an AQAP, together with information from national monitoring on high and low pollution years.

National Influence

National strategies, policies and plans have and will continue to influence local polluting emissions. Total UK emissions of NO_x fell by almost 70% between 1970 and 2015 and by over 19% between 2010 and 2015. Figure G. 2 shows the reduction for each source sector with cars having the largest proportion of transport emissions. It also shows an increasing proportion of Light Goods Vehicle (LGV) emissions from 2010 above that of 2000 which mirrors the increasing proportion of LGVs in the local traffic fleet.

Figure G. 2 - Annual UK Nitrogen Oxides Emissions Since 2000



Future influence on emissions is considered in a revised Clean Air Strategy **Error! Bookmark not defined.** with a major transport emission objective that states:

“We will end the sale of new conventional petrol and diesel cars and vans by 2040. We will position the UK as the best place in the world to develop, manufacture and use zero exhaust emissions vehicles and, during the transition, we will ensure that the cleanest conventional vehicles are driven on our roads”.

This transition to ultra-low and zero emission vehicles presents the largest potential for the reduction of future road traffic emissions in this AQMA.

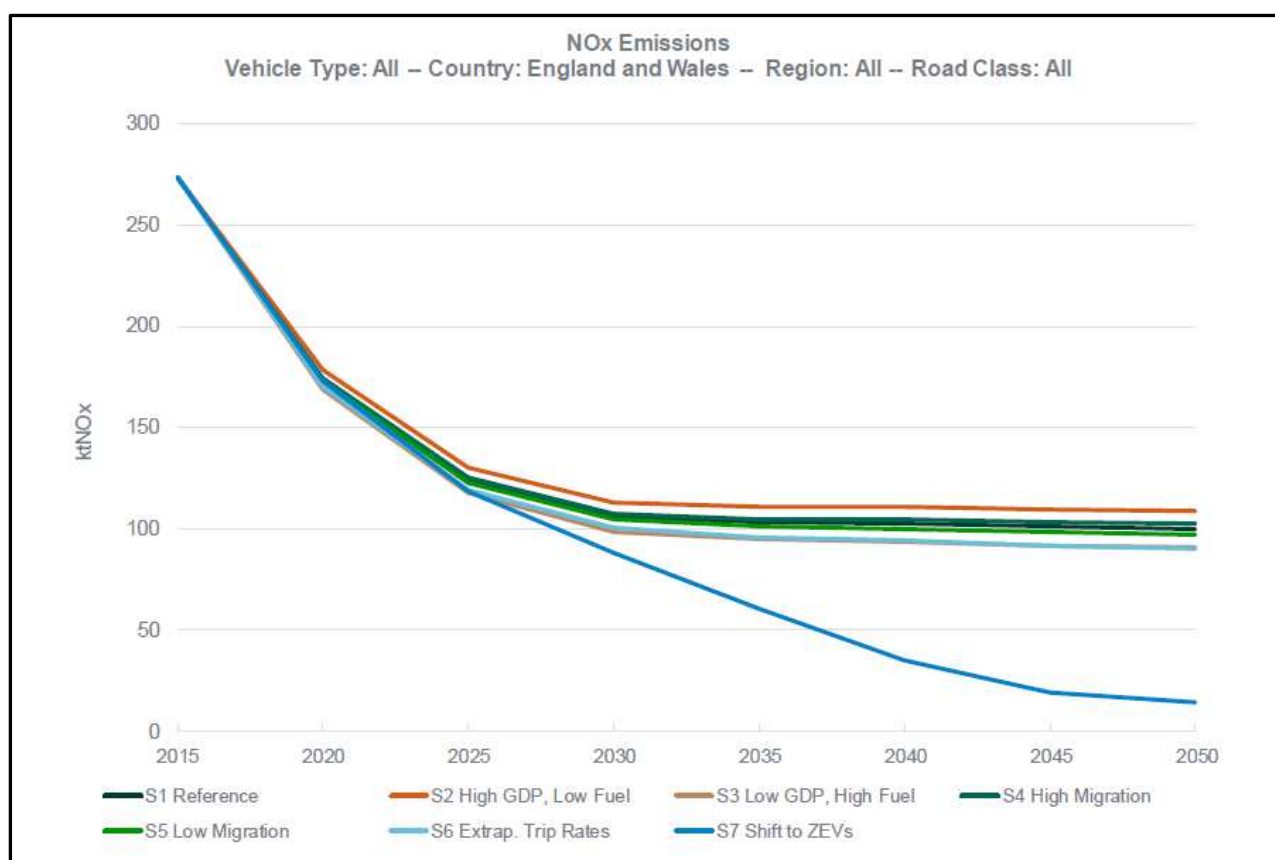
Department for Transport (DfT) road traffic forecasts¹ provide future numbers, compositions and emissions based on seven scenarios linked to changing population, economic and social well-being and technological changes. The findings include:

- From 2015, traffic is forecast to grow by between 17% and 51% by 2050;
- Traffic growth on the Strategic Road Network (SRN) ranges between growth of 32% and 66% by 2050;
- Forecast growth on principal roads and minor roads is between 10%-47% and 11%-50% respectively;
- Car traffic is forecast to grow between 11% and 48% by 2050, whilst LGV traffic is forecast to continue growing significantly in all scenarios (between 23% and 108%);
- HGV traffic growth is forecast to be lower than other vehicle types, with growth ranging from 5% to 12% by 2050;
- Congestion is forecast to grow as a result of increases in traffic. The proportion of traffic in congested conditions in 2050 is forecast to range from 8% to 16% depending on the scenario, compared to 7% in 2015; and
- ‘There is great uncertainty around the possible impact of transport technology on road traffic demand and it is unclear how far our existing understanding of the drivers of demand will continue to apply’.

¹ Department for Transport (DfT), July 2018 ‘Road Traffic Forecast 2018 Moving Britain Forward’

In terms of future transport emissions, the national transport model (NTM) produces forecasts of emissions of Carbon Dioxide (CO₂), Oxides of Nitrogen (NO_x) and Particulate Matter (PM₁₀) measured at the tailpipe (though this does not capture any upstream emissions produced) as shown in **Error! Reference source not found..** Scenarios 1-6 take account of the impact of committed transport policies to reduce emissions from road travel whilst scenario 7 assumes a higher level of ultra-low emission vehicle (ULEV) uptake, assuming 97% of cars and LGVs are Zero Emission Vehicles (ZEVs) by 2050 and almost all cars and LGVs sold from 2040 have zero emissions at tailpipe. For NO_x emissions the forecast shows a decline of between 60% and 95% by 2050 (Figure G.3). Despite the predicted increase in vehicle numbers the introduction of low emission vehicles is likely to lead to continued reduction in NO₂ levels from transport.

Figure G.3 - Forecast NO_x Road Traffic Emissions (kt) for England & Wales



As already highlighted in **Error! Reference source not found.**, COVID-19 also had notable impacts on NO₂ concentrations in 2020. The Air Quality Expert Group (AQEG) has estimated that during the initial lockdown period in 2020, within urbanised areas of the UK reductions in NO₂ annual mean concentrations were between 20 and 30% relative to pre-pandemic levels, which represents an absolute reduction of between 10 to 20µg/m³ if expressed relative to annual mean averages.

Regional Influence

Local Plan

The Suffolk Coastal Local Plan (SCLP) sets out a vision for the communities of the former Suffolk Coastal area up to 2036. The National Institute for Health and Care Excellence (NICE) encourages Local Authorities to address the issue of air pollution in their Local Plan. The SCLP seeks to improve air quality not only in AQMAs but across the plan area and elsewhere. In particular, development proposals are expected to minimise and mitigate air pollution and to contribute towards the achievement of air quality objectives.

The SCLP area comprises both urban and rural settlements and within certain parts there are limited public transport opportunities, resulting in a heavy reliance on private cars as a form of transport. Due to this, there has been a focus on sustainable transport mechanisms in the SCLP. This complements the Local Transport Plan (LTP), identifying changes that will secure an improved transport network and contributing to the shared priority of improving air quality.

Policy SCLP7.1: Sustainable Transport, impacts on air quality by regulating developments to ensure they encourage and facilitate the use of sustainable transport options where possible and support the efficient use of existing transport networks.

Developments are supported in the SCLP area only when:

- Any significant impacts on the highways network are mitigated;
- It is proportionate in scale to the existing transport network;
- All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;

- It is located close to, and provides safe pedestrian and cycle access to services and facilities;
- It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking
- It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
- The cumulative impact of new development will not create severe impacts on the existing transport network.

Other specific policies relevant to the improvement of air quality include Policy SCLP 10.3 Environmental Quality, which requires development proposals to protect the environment and minimise all forms of pollution where possible, including air pollution. Policy SCLP 11.2 Residential Amenity requires the Council to include air quality and pollution when considering the impact of a development on residential amenity.

Additionally, Policy SCLP 12.31: Strategy for Woodbridge is an area specific policy which sets out a strategy which acknowledges physical and environmental constraints. Opportunities to enhance the historic environment and the riverside character area of the town will be only supported where they bring economic and social benefits which do not have a significant adverse impact on the environmental designations. Part F of the policy, therefore is to consolidate a town that promotes improvements to air quality.

Local Transport Plan (LTP)

The Suffolk County Council LTP (2011-2031) also provides a strategy for transport management until 2031. The plan prioritises the growth of business, reducing the demand for car travel, making efficient use of transport networks and improving infrastructure, which should all help to ensure continued compliance within the Woodbridge AQMA.

Air Quality Action Plan

An Air Quality Action Plan was prepared for the Woodbridge AQMA, first published in May 2011. The Action Plan consists of 20 measures that could be undertaken at the junction to ease the congestion or reduce the overall traffic flows, in turn reducing NO₂. The measures can be considered within two main categories; 'on the ground works' and 'softer measures'.

The 'on the ground works' started with the installation of a new computerised Microprocessor Optimised Vehicle Actuation (MOVA) system to the traffic lights whose aim is to reduce congestion and therefore queue lengths. This reduced the extreme queue lengths at each arm of the junction but not the average number of vehicles queuing at the junction.

A feasibility study supported the further measures which involved physical junction alterations, which had two recommendations; to install a weather station for 3 months within the AQMA, and to trial holding back traffic a distance from the lights (therefore away from the AQMA) and pulse it through.

The weather station was installed from July to November 2015 and results showed that the topography of the junction itself is a major factor in the AQMA. The layout of the junction is such that the wind speed is much lower than expected and the wind direction is slightly altered from the norm. The study suggested that vehicle emissions are 'funnelled' along Melton Hill away from the junction, and are then dispersed very slowly due to the low wind speeds and canyon like effect of the buildings on both sides. Emissions therefore tend to accumulate rather than disperse resulting in higher than expected NO₂ concentrations at this road junction.

As has been demonstrated, NO₂ concentrations within the AQMA have reduced to below the AQS objective without a discernible change in traffic volume. It is hypothesised that the general fleet emissions reductions, achieved as older vehicles are replaced with newer, cleaner ones, is the primary cause. This, alongside the incremental improvements brought about through the implementation of the AQAP, has led to the potential for revocation of the AQMA.

The AQAP was in the process of being updated, and a draft version has been approved by Defra. Due to the decision to revoke this AQMA, it is the Council's

intention that the draft updated Action Plan will not be finalised, but will be retained and archived for future use if needed.

Air Quality Strategy

In 2021 East Suffolk Council published its first Air Quality Strategy, which aims to:

- Raise public awareness of the importance of air quality;
- Reduce emissions of PM_{2.5} within the district;
- Encourage and enable active travel to benefit air quality and improve public health;
- Document the efforts made to improve air quality across the different areas of the Council.

By setting a strategic direction on air quality at both district and county levels across the district, it is anticipated that greater improvements can be made, including within the Woodbridge AQMA. The strategy sets out a number of statutory and non-statutory obligations, ranging from sustainable transport to public information, that set the agenda the Council will be working towards in the coming years. As per paragraph 4.11 of LAQM.PG(16), the strategy effectively supersedes local action planning work in the event of revocation, ensuring continued air quality improvements beyond statutory designations.

Local Development

Development Consent Order (DCO) applications have been submitted for Sizewell C (SZC), East Anglia ONE North and East Anglia TWO (EA1N and EA2) Offshore Windfarms, which it is recognised may have an impact on Woodbridge. Further information on these DCO applications can be found at:

- [The Sizewell C Project | National Infrastructure Planning](#);
- [East Anglia ONE North Offshore Windfarm](#); and
- [East Anglia TWO Offshore Windfarm](#).

All three applications have had detailed air quality assessments submitted, which the Council have had independently reviewed. The applications assess the individual DCO impacts and the 'in-combination' impacts of all three DCOs together. None of the

DCOs, either individually or in-combination, are assessed to cause significant impacts within the Woodbridge AQMA.

Air quality monitoring within and around the Woodbridge AQMA will be continued by the Council throughout the construction period of these DCOs. Traffic mitigation for the construction phase of SZC has been included in the DCO through the inclusion of Park and Ride sites for workers, a Freight Management Centre for construction vehicles, and in the form of a Construction Traffic Management Plan and Construction Worker Travel Plan which are under discussion as part of the DCO. These should ensure that local air quality considerations are met, within which Woodbridge will be included.

Discussions are also underway to agree the use of the latest EURO emission classifications for the construction fleet where possible for all DCO applications, to minimise their impacts on emissions.

The District Council office was moved out of Woodbridge in 2016, though the site is yet to be developed. An application (*DC/19/2641/FUL - Former Council Offices, Melton Hill, Woodbridge IP12 1AU - Residential development (100 no units) including 32 no affordable housing units (Class C3) plus a community space (91 sq.m) (Class D1) and a retail unit (157.7sq.m) (A1/A2/A3), car parking, means of access and landscaping, all following demolition of the buildings on site*) was permitted for the site in November 2019. The air quality assessment submitted for the application indicated that fewer journeys would be made through the AQMA under the revised land use. Full details can be found via the Council's [Simple Search](#) planning website. The site was remarketed in Summer 2021 and the procurement process is currently being followed to identify the preferred bidder.

The new Council Offices are located at Riduna Park in Melton, approximately 1 mile from the original site and the AQMA. In August 2016 a Travel Plan was published for the Riduna Park site which helps to mitigate the number of journeys made by Council employees, including through the AQMA. During the first Covid-19 pandemic lockdown in 2020 East Suffolk Council staff were given the ability to work from home where appropriate and this has continued to the present day. Emissions associated with ESC travel will have been much reduced during the lockdowns and this reduction is continuing.

Air Quality within the Woodbridge AQMA

A comparison of the annual mean AQS objective for NO₂ against the ratified monitoring results between 2000 and 2020 from diffusion tubes located with the East Suffolk Woodbridge AQMA can be seen in Figure G.4.

Figure G.4 - Woodbridge AQMA NO₂ Diffusion Tube Monitoring Trend.

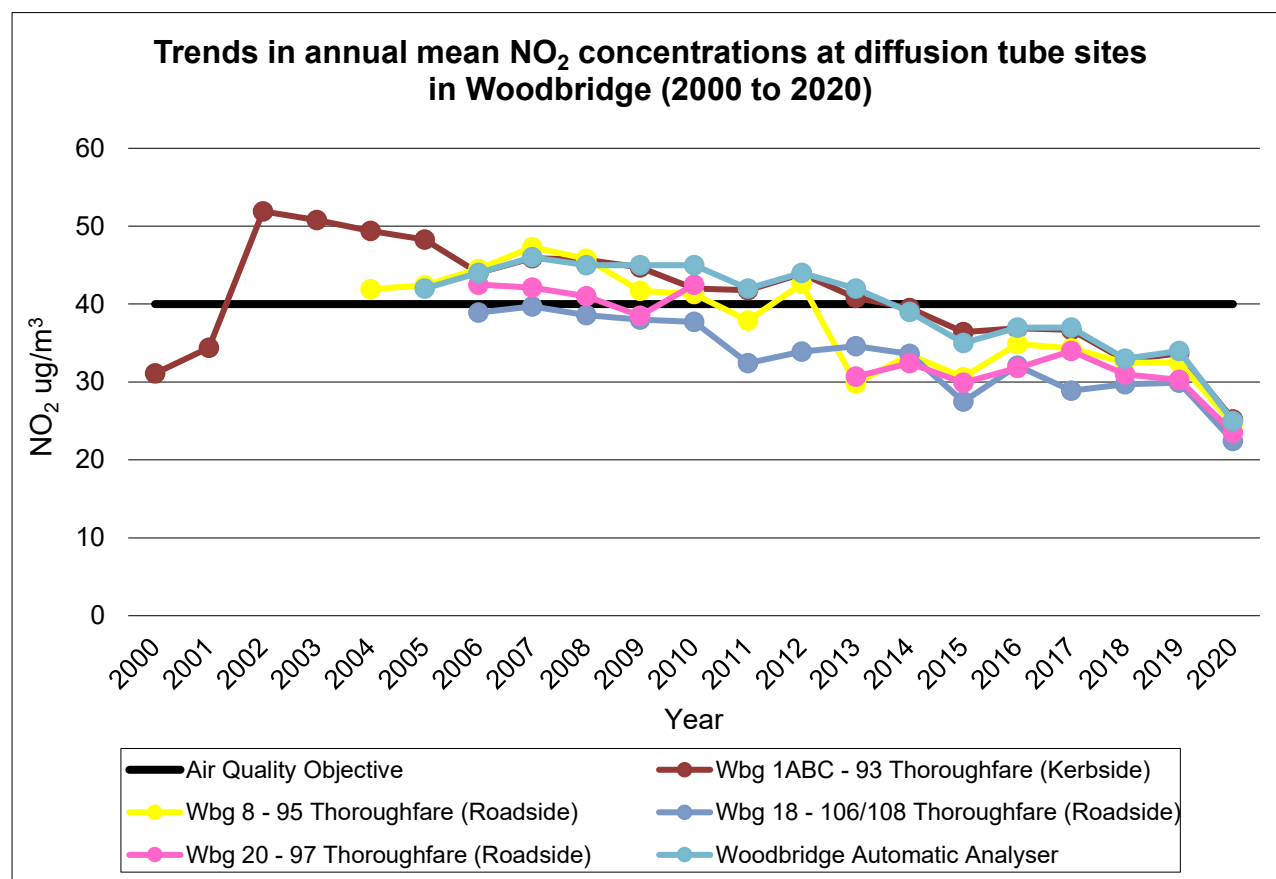


Figure G.4 shows that all five monitoring locations within the AQMA, the monitored NO₂ concentrations have been consistently below the annual mean AQS objective of 40 µg/m³ for seven years (since 2014). Furthermore, given that the concentrations have consistently been below 60 µg/m³ it is unlikely that the hourly mean AQS objective has been exceeded during this period. This is reflected by the automatic monitoring data, which has recorded just one hourly mean concentration in excess of 200 µg/m³ in the last five years, and that in 2017.

Predicted Trends

To provide confidence that compliance with the objective will continue, Defra's Roadside NO₂ Projection factors (Table G.3) have been used. The 2020 monitored concentrations have been projected forward five years (2021-2025) to demonstrate concentrations are expected to remain below the AQS objective. The adjustment factors applied for Woodbridge were the 'Rest of UK HDV=<10%'. The projected results for the diffusion tube locations within the AQMA are presented in Table G.1.

Table G.1 – 2020-based Projected Annual NO₂ Mean Concentrations - Woodbridge

Site	Monitored Annual NO ₂ mean concentration (µg/m ³)	Projected Annual NO ₂ mean concentration (µg/m ³)				
	2020	2021	2022	2023	2024	2025
WBG 1 ABC (93 Thoroughfare)	25.2	23.8	22.5	21.3	20.1	19.1
WBG 8 (95 Thoroughfare)	24.5	23.2	21.9	20.7	19.6	18.6
WBG 18 (106/108 Thoroughfare)	22.5	21.2	20.0	19.0	17.9	17.0
WBG 20 (97 Thoroughfare)	23.5	22.2	20.9	19.9	18.8	17.8
Woodbridge Automatic Analyser	25.0	23.6	22.3	21.1	20.0	18.9

In recognition of the likelihood that 2020 is somewhat of an anomalous year, similar projections have been made based on 2019 data, as follows in Table G.2, to provide further confidence in the assessment of continued compliance.

Table G.2 – 2019-based Projected Annual NO₂ Mean Concentrations - Woodbridge

Site	Monitored Annual NO ₂ mean concentration (µg/m ³)	Projected Annual NO ₂ mean concentration (µg/m ³)				
	2019	2021	2022	2023	2024	2025
WBG 1 ABC (93 Thoroughfare)	33.7	30.2	28.5	27.1	25.6	24.3
WBG 8 (95 Thoroughfare)	32.5	29.2	27.5	26.1	24.7	23.4
WBG 18 (106/108 Thoroughfare)	29.9	26.8	25.3	24.0	22.7	21.5
WBG 20 (97 Thoroughfare)	30.3	27.2	25.7	24.3	23.0	21.8
Woodbridge Automatic Analyser	34.0	30.5	28.8	27.3	25.8	24.5

From **Error! Reference source not found.** and Table G.2, it can be observed that in either case, the forecasted concentrations of NO₂ decrease over the five-year period, and remain well below the AQS annual mean objective, even assuming a return to 2019 activity levels. The Government’s commitment to net zero emissions by 2050 and the adoption of the Road to Zero transport strategy are expected to deliver significant further reductions in emissions from road transport. In its publication “Road Traffic Forecasts 2018”² the Department of Transport has predicted that vehicular emissions of NO₂ will fall between 60% and 90%. In turn, this provides confidence that the Woodbridge AQMA can be revoked without concern that the objective concentration will be exceeded, unless significant new sources arise, at which point the NO₂ concentrations will be assessed again. The Council intend to continue its existing monitoring regime in order to observe this.

² Department of Transport. Road Traffic Forecasts 2018. Available at:
<https://www.gov.uk/government/publications/road-traffic-forecasts-2018>

Table G.3 - Defra's Roadside NO₂ Projection Factors

Projecting Annual Mean Roadside NO ₂ Concentrations to Future Years						
Year	Adjustment Factor to be Applied					Worked Example
	Central London	Inner London	Outer London	Rest of UK (HDV = <10%)	Rest of UK (HDV >10%)	
2018	1.000	1.000	1.000	1.000	1.000	The measured NO ₂ concentration at a roadside site in Outer London in 2019 is 44.5µg/m ³ . The projected concentration for 2021 would be: 44.5 x (0.829/0.945) = 39.0µg/m ³ .
2019	0.813	0.909	0.945	0.953	0.942	
2020	0.766	0.811	0.878	0.906	0.889	
2021	0.740	0.767	0.829	0.855	0.835	
2022	0.715	0.727	0.775	0.807	0.785	
2023	0.696	0.693	0.738	0.765	0.743	Roadside locations are typically within 1 to 5 metres of the kerbside, but may extend up to 15 metres depending upon the road configuration and traffic flow.
2024	0.676	0.661	0.695	0.724	0.703	
2025	0.660	0.634	0.657	0.686	0.667	
2026	0.652	0.616	0.630	0.653	0.637	
2027	0.645	0.598	0.606	0.622	0.610	
2028	0.638	0.580	0.582	0.595	0.587	
2029	0.632	0.563	0.560	0.571	0.566	
2030	0.626	0.546	0.542	0.550	0.549	

Summary, Conclusion and Recommendation

This assessment sets out the evidence relied upon by East Suffolk Council in seeking to revoke the Woodbridge AQMA.

Part IV of the Environment Act 1995 requires Local Authorities to review air quality in its area and assess whether AQS objectives will be achieved. Where it has been shown that the AQS objectives will not be achieved Local Authorities must declare an AQMA and put an AQAP in place to bring air quality within acceptable levels.

Where it can be subsequently demonstrated that AQS objectives are being and will continue to be met a Local Authority can revoke an AQMA by Order under the Environment Act 1995.

The Woodbridge AQMA was designated in 2006 to address exceedances of traffic related NO₂ concentrations. Since 2006, monitoring has shown a continued reduction in pollutant concentrations, with recorded values having fallen below the AQS consistently for several years, since 2014.

National, regional and local policies have influenced the reduction in polluting emissions within the AQMA and it is reasonable to expect that further reductions will be achieved through the increasing use of ultra-low and zero emission vehicles in the coming years.

Having considered the historical monitoring data associated with the Woodbridge AQMA, national trends in emissions and any likely impacts on the air quality within the AQMA, the Council is satisfied that the AQMA can be revoked. Whilst NO₂ concentrations within the Woodbridge AQMA have been consistently below the AQS objective for seven years, it has also been demonstrated that this is likely to continue into the future.

It is therefore recommended that the Woodbridge AQMA be revoked at the earliest opportunity. A draft Revocation Order is presented in **Error! Reference source not found.**, which provided Defra grants approval via the appraisal process, will be enacted as soon as possible, provisionally 1st February 2022.

As per paragraph 4.11 of LAQM.PG(16), the Council's recently published Air Quality Strategy will effectively supersede local action planning work in the event of revocation, ensuring continued air quality improvements beyond statutory designations.

Local Authority:	East Suffolk Council
Reference:	ASR21-1115
Date of issue	December 2021

Annual Status Report Appraisal Report

The Report sets out the Annual Status Report (ASR), which forms part of the Review & Assessment process required under the Environment Act 2021 and associated Regulations.

East Suffolk Council currently have two Air Quality Management Areas (AQMA)s in place. AQMA no.1 was declared in 2006 designated for exceedances of annual mean NO₂ concentrations. The AQMA covers an area encompassing a number of properties near the junction of Lime Kiln Quay Road, Thoroughfare and St. John's Street in Woodbridge. An Air Quality Action Plan (AQAP) for this AQMA was published in 2011. The ASR includes an assessment submitted for the purpose of revoking this AQMA as recommended as part of the review of the ASR submitted in 2020.

AQMA no.3 was declared in 2014 for exceedances of the annual mean NO₂ objective. The AQMA covers the four properties situated within 1-5 Long Row, Main Road (A12), in Stratford St. Andrew. An AQAP relevant to the current AQMA was published in 2018.

Automatic monitoring of NO₂ is completed within AQMA No.1. Monitoring has been co-located at this site to be able to inform a local bias adjustment factor which has been used for diffusion tubes located within the Woodbridge area in 2020.

Non-automatic (passive) monitoring of NO₂ was undertaken at 78 sites during 2020, including 12 new sites. Two monitoring sites have been annualised in accordance with LAQM.TG16, with the Council having utilised the Diffusion Tube Data Processing Tool.

There were no monitored exceedances of the air quality objectives for NO₂ during 2020.

A high level of detail is presented within the ASR detailing the actions that are currently being taken to reduce concentrations of air pollutants across both of the AQMAs, this is welcomed.

QA/QC procedures are correctly detailed within Appendix C and the annualisation of monitoring sites has been conducted, where required, in line with guidance provided within TG(16). A local bias adjustment factor has been utilised within the 2020 diffusion tube data within the Woodbridge AQMA and a National factor used for all other sites following a review of both national and local factors.

Local Authority:	East Suffolk Council
Reference:	ASR21-1115
Date of issue	December 2021

The Air Quality Strategy was published in 2021 which contains supplementary policies and measures to further reduce pollutant concentrations.

Appendix G provides evidence for the revocation of AQMA No.1. The evidence includes a review of existing local and national pollutant concentration trends. No detailed dispersion modelling has been completed. It is considered, given the scale of the AQMA and the evidence of consistent monitoring below the Air Quality objective, prior to 2020, that sufficient evidence is presented to revoke the AQMA.

On the basis of the evidence provided by the local authority, the conclusions reached are acceptable for all sources and pollutants. Following the completion of this report, East Suffolk Council should proceed with the revocation of the AQMA no.1. Following this an Annual Status Report should be submitted in 2022.

Local Authority:	East Suffolk Council
Reference:	ASR21-1115
Date of issue	December 2021

Commentary

The report is well structured, detailed, and provides the information specified in the Guidance. The following comments are designed to help inform future reports.

1. The national diffusion tube bias adjustment factor has been taken from the 06/21 version of the national database and this has been used for all diffusion tubes outside the Woodbridge AQMA. A new version (09/21) was the latest available published version at the time of submission. It is not considered that this latest version would significantly change the results presented within the report but the local authority is reminded to keep up to date with the latest available tools. It is noted that this was also an issue in last year's ASR. A Local factor has been used for monitoring within the Woodbridge AQMA. This is consistent with previous years.
2. Within Table A.1, it is specified that the monitoring site is within an AQMA. Please include the AQMA within which the monitoring is located within this table in future.
3. A high level of detail has been provided within the ASR in regard to the positive works being undertaken by the Council in terms of working to reduce air pollutant concentrations across the city. This is welcomed and updates for all described measures should be provided within the 2022 ASR.
4. Maps are clearly provided for each monitoring location in detail within the local authority, this is welcomed. A map showing an overview across the whole local authority may be helpful within future ASRs.
5. Within the excel sheet uploaded, a different value is provided to that within the word document. Table 2.1 of the Excel file has a different level of exceedance in AQMA No.3 (27.1 in report and 27.4 in excel). It is believed the value should be 27.1 in line with monitoring in Table A.4. The local authority is reminded to check for consistency across all submitted documents.
6. Information has been submitted for the revocation of AQMA no.1, it is considered the evidence submitted is sufficient to determine that it is unlikely that there would be future exceedances of the annual mean objective for NO₂ within this AQMA.
7. Appendix F has been completed detailing the local authority's approach to the Covid-19 pandemic. It is welcomed that the council has found opportunities to improve sustainable travel infrastructure as a result of the pandemic.

Local Authority:	East Suffolk Council
Reference:	ASR21-1115
Date of issue	December 2021

8. The report provides a very good overview of air quality within the Local Authority in 2020. The council are encouraged to continue their excellent work in developing partnerships and improving air quality.

This commentary is not designed to deal with every aspect of the report. It highlights a number of issues that should help the local authority either in completing the Progress Report adequately (if required) or in carrying out future Review & Assessment work.

Issues specifically related to this appraisal can be followed up by returning the attached comment form to Defra, Welsh Assembly Government, Scottish Government or DOE.

For any other queries please contact the Local Air Quality Management Helpdesk:

Telephone: 0800 0327 953

Email: LAQMHelpdesk@uk.bureauveritas.com

Appraisal Response Comment Form

Contact Name:	
Contact Telephone number:	
Contact email address:	

Comments on appraisal/Further information:



CABINET

Tuesday, 03 May 2022

Subject	Affordable Housing Supplementary Planning Document
Report of	Councillor David Ritchie, Cabinet Member with responsibility for Planning and Coastal Management
Supporting Officer	Andrea McMillan Principal Planner (Policy and Delivery) andrea.mcmillan@eastsuffolk.gov.uk 07766 071710

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

Purpose and high-level overview

Purpose of Report:

The purpose of this report is to recommend the adoption of the Affordable Housing Supplementary Planning Document (SPD). The Affordable Housing SPD supports the implementation of policies relating to affordable housing in the East Suffolk Council – Suffolk Coastal Local Plan and East Suffolk Council – Waveney Local Plan. The SPD provides guidance on the implementation of planning policies relating to affordable housing including in relation to types of affordable housing, identifying an appropriate mix of affordable housing, the design of affordable housing, legal agreements and carrying out local housing needs assessments. The Affordable Housing SPD is appended at Appendix A of this report.

Options:

Adopt the Affordable Housing SPD. This will mean the Council has an up-to-date SPD to guide the implementation of the affordable housing planning policies.

An alternative option would be to not adopt the Affordable Housing SPD and continue to implement the planning policies without the additional guidance. However, this would be a missed opportunity to provide further clarification on the requirements of the policies and to ultimately support effective implementation of the relevant Local Plan policies.

Recommendation/s:

1.1 That Cabinet adopts the Affordable Housing Supplementary Planning Document

1.2 That the Head of Planning and Coastal Management, in consultation with the Cabinet Member for Planning and Coastal Management, is authorised to make any presentational or typographical amendments to the Affordable Housing Supplementary Planning Document prior to it being published.

Corporate Impact Assessment

Governance:

No impact.

ESC policies and strategies that directly apply to the proposal:

The Affordable Housing SPD primarily supports the implementation of policies SCLP5.10 Affordable Housing on Residential Developments and SCLP5.11 Affordable Housing on Exception Sites in the East Suffolk Council – Suffolk Coastal Local Plan (2020) and policies WLP8.2 Affordable Housing and WLP8.6 Affordable Housing in the Countryside in the East Suffolk Council – Waveney Local Plan (2019).

Environmental:

The Affordable Housing SPD supports the implementation of planning policies relating to affordable housing. In relation to design, the Affordable Housing SPD includes reference

to sustainable construction, however appropriately defers largely to the Council's Sustainable Construction SPD on this topic. The Affordable Housing SPD also contains guidance on consideration of landscape impacts of affordable housing developments. A Strategic Environmental Assessment Screening Opinion (Appendix C) was undertaken and concluded that a full Strategic Environmental Assessment would not be necessary. A Habitats Regulations Assessment Screening Statement (Appendix D) was also undertaken and concluded that the Affordable Housing SPD will not lead to likely significant effects on protected Habitat sites.

Equalities and Diversity:

An Equality Impact Assessment Screening Opinion was produced in October 2021 to accompany consultation on the Draft Affordable Housing SPD (Appendix E). The SPD has also been subject to separate Equality Impact Analysis as part of the production of this report (ref: EQIA413334260) in April 2022. Both assessments concluded no differential negative impacts on those with protected characteristics.

Financial:

The production and adoption of the Affordable Housing SPD is covered by the existing budget of the Planning Policy and Delivery Team.

Human Resources:

No impact.

ICT:

No impact.

Legal:

The Affordable Housing SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The Affordable Housing SPD has been subject to a Strategic Environmental Assessment Screening Opinion in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (Appendix C). It has also been subject to a Habitats Regulation Assessment Screening Statement, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) (Appendix D). An Equality Impact Assessment Screening opinion was produced to meet the requirements of the Equality Act 2010 (Appendix E).

Risk:

There are no risks envisaged in relation to the implementation of the recommendations.

External Consultees:	<p>The Affordable Housing SPD has been subject to consultation during its preparation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</p> <p>The list of consultees, respondents, summaries of their comments and how these have been responded to can be found in the Consultation Statement which is appended to this report (Appendix B).</p>
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected? <p>The Affordable Housing SPD supports the delivery of Strategic Plan priority P08 by providing guidance to support the implementation of the affordable housing policies contained in the Local Plans, which will in turn help to address housing needs. The Affordable Housing SPD includes guidance on community led housing, which supports priority P07 and as a whole contributes to P01 by supporting the delivery of the housing strategies and policies of the Local Plans.</p>			

Background and Justification for Recommendation

1	Background facts
1.1	The Council has two adopted Local Plans: the East Suffolk Council – Waveney Local Plan (March 2019) and the East Suffolk Council – Suffolk Coastal Local Plan (September 2020). These Local Plans both contain policies relating to affordable housing, namely SCLP5.10 Affordable Housing on Residential Developments and SCLP5.11 Affordable Housing on Exception Sites in the Suffolk Coastal Local Plan and policies WLP8.2 Affordable Housing and WLP8.6 Affordable Housing in the Countryside in the Waveney Local Plan.
1.2	<p>The Council has two current adopted guidance documents:</p> <ul style="list-style-type: none"> • Supplementary Planning Guidance 2: Affordable Housing (July 2004) (this applies to the former Suffolk Coastal area; • Affordable Housing Supplementary Planning Document (May 2012) (this applies to the former Waveney local planning authority area). <p>These are considered to be out of date in places in relation to adopted Local Plan policies and current Government policy contained within the National Planning Policy Framework (NPPF) and associated national Planning Practice Guidance. Since the production of these documents the Government also introduced the Vacant Buildings Credit, via revisions to Planning Practice Guidance, and the Council currently publishes its advice in a separate Vacant Building Credit Advice Note.</p>
1.3	In May 2021, the Government issued new Planning Practice Guidance on a new tenure of affordable housing, First Homes. The Council published a First Homes Position Statement in June 2021 (and updated this in February 2022) setting out that it intended to provide guidance on implementation of the First Homes policy as part of its emerging Affordable Housing Supplementary Planning Document.
1.4	The Affordable Housing SPD (Appendix A) provides guidance on a range of topics including in relation to types of affordable housing, identifying an appropriate mix of affordable housing, the design of affordable housing, legal agreements and carrying out local housing needs assessments. The SPD also incorporates model Heads of Terms and Template Clauses for legal agreements relating to affordable housing. Guidance on First Homes and the Vacant Buildings Credit is included in the Affordable Housing SPD.
1.5	The Affordable Housing SPD does not create new policies but rather seeks to provide guidance that will help with the implementation of relevant policies in the Suffolk Coastal and Waveney Local Plans.
1.6	The Affordable Housing SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
1.7	The preparation of the Affordable Housing SPD has been undertaken through an officer steering group, and preparation has involved officers from Planning Policy and Delivery, Housing, Development Management, Section 106 officers and Legal Services. The preparation of the Affordable Housing SPD has been overseen by the Local Plan Working Group.
1.8	The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) require the Council to undertake consultation to inform the production of the SPD and, as a minimum, requires that the draft document is published for four weeks and that during that time it is available on the Council's website and

	that hard copies are available for inspection in the Council offices. The latter requirement was temporarily removed until 31 st December 2021 (through amending legislation related to the Covid-19 pandemic) however the Council still provided that service as far as was reasonably possible. The Council's adopted Statement of Community Involvement (April 2021) also sets out further measures and actions that the Council will undertake when consulting on a draft SPD including publicising via social media sites and making copies of documents available in libraries.
1.9	The Affordable Housing SPD was subject to two rounds of consultation during its preparation, the details of which are contained in the Consultation Statement (Appendix B). The first was an initial consultation to inform the scope and content of the SPD. The initial consultation was carried out between 9 th November and 21 st December 2020. In total 22 individuals and organisations responded to the consultation. Between them they made 194 comments. Virtual roundtable sessions were also held to inform the preparation of the Model Heads of Terms and Template Clauses. The responses received to the initial stage of consultation were used to inform preparation of a draft document which was subsequently subject to a public consultation. Summaries of the consultation responses, and how they were addressed in drafting the SPD, are contained in the Consultation Statement (Appendix B).
1.10	The Draft Affordable Housing SPD consultation ran from 1 st November until 13 th December 2021. The consultation was advertised on the Council's website, as well as on social media. 4,069 emails and 583 letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes town and parish councils, individuals and organisations, including those who were previously contacted or responded to the informal stage of the consultation. In total 27 individuals and organisations responded to the consultation. Between them they made 111 comments.
1.11	The main themes of the comments received are summarised below; however, some of the comments covered very specific matters and it is not possible to summarise all of them here in a succinct manner. The full consultation responses have been published on the Council's consultation website (see - https://eastsuffolk.inconsult.uk/ESAFFHSGDRAFT/listResponses) and are all summarised in the Consultation Statement (Appendix B).
1.12	<p>The main issues raised through the consultation on the Draft Affordable Housing SPD were:</p> <p>General comments / Ch 1. Introduction</p> <ul style="list-style-type: none"> • Overall support from some respondents; • The SPD should recognise that the Broads Local Plan defers to the Waveney Local Plan affordable housing policies; • The SPD could include more contextual information including on the types of development that come forward and the housing enabling function; • Service Family Accommodation should be included as a form of affordable housing; • The SPD should facilitate affordable housing delivery rather than hinder it. <p>Ch 2. Types of affordable housing</p> <ul style="list-style-type: none"> • Discounted sale housing is not affordable where house prices are high; • Affordable self build is impractical / further detail on mechanisms for affordable self build should be included;

	<ul style="list-style-type: none"> • Affordable housing for key health workers should be considered. <p>Ch 3. Mix of affordable housing</p> <ul style="list-style-type: none"> • There should be flexibility on tenure; • Both support and objection to the approach to applying the requirement for 25% First Homes in place of discounted market housing; • Varying views on provision of affordable housing on specialist housing developments, including that it is best provided off-site and that the SPD should be clear on requirements for affordable housing on residential care developments; • Provision of accessible and adaptable dwellings should be focused on affordable housing. <p>Ch 4. Section 106 agreements</p> <ul style="list-style-type: none"> • There should be more flexibility in relation to when information must be provided and the point in a development when triggers associated with delivering affordable housing will apply; • S106 agreements must be rigorously enforced. <p>Ch 5. Financial contributions</p> <ul style="list-style-type: none"> • Issues raised over the use of open market plot values to calculate commuted sums, including that current values are too high. <p>Ch 6. Exception sites</p> <ul style="list-style-type: none"> • Entry level and First Homes exception sites should reflect district, rather than local, needs; • Consider developing exception sites for key health workers; • Greater recognition could be made of Registered Providers delivering exception sites. <p>Ch 7. Design</p> <ul style="list-style-type: none"> • Support for tenure-blind design; • Design guidance should be focused on Registered Providers' requirements; • Concern over maximum affordable housing 'cluster' size being set at ten dwellings; • Concern over preference for mixed-tenure apartment blocks; • Consideration should be given to affordable housing with shared facilities; • The SPD could promote sustainable construction methods. <p>Ch 8. Local Housing Needs Assessments</p> <ul style="list-style-type: none"> • Assessments of housing need should take account of the cost of private rents; • The roles of Parish Councils, the Housing Enabling functions and Registered Providers should be laid out. <p>Ch 12. Making a Planning Application</p> <ul style="list-style-type: none"> • The size and mix of affordable housing should not need to be submitted at outline stage <p>Appendix 1 – Affordable Housing Needs by Tenure (SHMA)</p> <ul style="list-style-type: none"> • There should be more interpretation of the information. <p>Appendix 2 – Section 106 Model Heads of Terms and Template Clauses</p> <ul style="list-style-type: none"> • Respondents suggested that there should be more flexibility, for example in relation to triggers for contracts with a Registered Provider and for delivery.
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1.13	<p>Changes have been made to address many of the comments received, where appropriate, including:</p> <ul style="list-style-type: none"> • Reference made to the Broads Local Plan policies which defer to the Waveney Local Plan, and the guidance in the SPD may therefore be relevant to the Broads in Chapter 1 and Chapter 5; • Further information on the Council's role in developing and facilitating affordable housing in Chapter 1; • Addition of reference to Service Family Accommodation in the context of affordable housing in Chapter 2; • Additional information on Cohousing in Chapter 2; • Addition of reference to other site specific considerations that may inform the mix of affordable housing in Chapter 3; • Amendments explaining the approach to application of the Government's First Homes policy, in Chapter 3; • Amending the guidance on accessible and adaptable dwellings, as required under Local Plan policies SCLP5.8 and WLP8.31, to focus further on affordable housing, in Chapter 3 and Chapter 7; • Further clarity on the information expected at outline planning stage in Chapter 4; • Amendments to reflect national policy on First Homes exceptions sites in Chapter 4, Chapter 6 and Appendix 2; • Further explanation of the methodology for calculating financial contributions in Chapter 5; • Additional text to recognise that the procedural guidance for bringing forward exception sites may not apply for every situation, and is recommended in Chapter 6; • Amendments to guidance on mixed tenure apartment blocks to acknowledge operational complexities associated with these in Chapter 7; • Additional text to explain the rationale for seeking to limit the size of 'clusters' of affordable housing on any one site; • Additional text acknowledging the benefits of sustainable construction in Chapter 7; • Amendments in relation to provision of details, including details of Registered Providers, in Appendix 2; • Minor changes for correction or clarity. <p>Full details of how comments have been responded to are contained in the Consultation Statement (Appendix B).</p> <p>The Government published Template Clauses for legal agreements relating to First Homes in December 2021 after the close of the consultation. This was anticipated, and the Draft Affordable Housing SPD had set out that the Council would consider using these once they were published. Where appropriate, the Government's Template Clauses have therefore been incorporated into the Model Heads of Terms and Template Clauses in Appendix 2 of the SPD.</p> <p>In addition, further changes have been made to address typographical and grammatical errors and to provide clarity on certain elements of guidance.</p>
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1.14	Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the draft Affordable Housing SPD to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not required. The final Strategic Environmental Assessment Screening Opinion is appended to this report (Appendix C).
1.15	Habitat Regulations Assessment screening was also undertaken which concluded that implementation of the Affordable Housing SPD would not lead to likely significant effects on protected Habitat sites and that it is therefore not considered necessary to undertake an Appropriate Assessment. The final Habitat Regulations Assessment Screening Statement is appended to this report (Appendix D).

2 Current position

2.1	<p>Adopted planning policy on affordable housing is set out in the Council's two Local Plans. The two adopted local plans are the East Suffolk Council – Suffolk Coastal Local Plan (September 2020) and the East Suffolk Council – Waveney Local Plan (March 2019).</p> <p>Guidance is also currently provided in:</p> <ul style="list-style-type: none"> • Supplementary Planning Guidance 2: Affordable Housing (July 2004) (this applies to the former Suffolk Coastal area); • Affordable Housing Supplementary Planning Document (May 2012) (this applies to the former Waveney local planning authority area). <p>These guidance documents are considered to be out of date in places in relation to adopted Local Plan policies and current Government policy contained within the National Planning Policy Framework (NPPF) and associated government guidance. These documents also refer to planning policies that are no longer in place.</p> <p>The Council has also separately published a Vacant Building Credit Advice Note and a First Homes Position Statement.</p>
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3 How to address current situation

3.1	The Affordable Housing SPD (Appendix A) contains comprehensive planning guidance on affordable housing issues within a single document. It has been prepared to support the implementation of policies contained in the adopted Local Plans, as well as being consistent with Government policy, principally that contained within the National Planning Policy Framework as well as associated national Planning Practice Guidance. The production of the Affordable Housing SPD enables guidance on First Homes and Vacant Building Credit to also be incorporated into the SPD as appropriate.
3.2	On adoption the Affordable Housing SPD will be a material consideration in the determination of planning applications.
3.3	<p>Once adopted, the Affordable Housing SPD will replace the following adopted SPD/SPG:</p> <ul style="list-style-type: none"> • Supplementary Planning Guidance 2: Affordable Housing (July 2004) (this applies to the former Suffolk Coastal area);

	<ul style="list-style-type: none"> Affordable Housing Supplementary Planning Document (May 2012) (this applies to the former Waveney local planning authority area).
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4 Reason/s for recommendation

4.1	Adoption of the Affordable Housing SPD will provide up to date guidance to assist with the implementation of the Council's Local Plan policies which relate to affordable housing.
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Appendices

Appendices:

Appendix A	Affordable Housing Supplementary Planning Document
Appendix B	Consultation Statement (April 2022)
Appendix C	Strategic Environmental Assessment Screening Opinion (October 2021, updated April 2022) (produced to accompany consultation on Draft SPD, and updated in April 2022)
Appendix D	Habitat Regulations Assessment Screening Statement (October 2021) (produced to accompany consultation on Draft SPD)
Appendix E	Equality Impact Assessment Screening Opinion (October 2021) (produced to accompany consultation on Draft SPD)

Background reference papers:

Date	Type	Available From
March 2019	East Suffolk Council- Waveney Local Plan	https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/
September 2020	East Suffolk Council- Suffolk Coastal Local Plan	https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/
June 2021 (Updated February 2022)	First Homes Position Statement	First-Homes-Position-Statement.pdf (eastsuffolk.gov.uk)
September 2018	Vacant Building Credit – Advice Note	Vacant-Building-Credit-advice-note.pdf (eastsuffolk.gov.uk)
April 2021	Statement of Community Involvement	Statement-of-Community-Involvement.pdf (eastsuffolk.gov.uk)


AFFORDABLE HOUSING

SUPPLEMENTARY PLANNING DOCUMENT

May 2022



How to use this document

The document comprises of 12 chapters with each chapter covering a different topic. The best way to navigate through the document is by using the interactive contents. By clicking on a specific chapter in the contents, it will automatically take you to that part of the document. Moreover, if you want to go to a different section quickly, the easiest way is to click the home symbol  in the top right corner of the page. This will take you back to the contents where you can then select a different chapter. There is also a guide on the right-hand side of each page, this will show you what chapter of the document you are currently in and where that sits within the rest of the document. Throughout the document there are hyperlinks in the text that provide links to further information.

What is a Supplementary Planning Document?

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



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1. Introduction

Context

- 1.1 Whilst the cost of housing varies across East Suffolk, access to affordable housing is an issue across the district. Government statistics show that, at the time of preparation of this Supplementary Planning Document (SPD), the ratio of earnings to house prices is on average 8.39 in East Suffolk (i.e. the average house is 8.39 times the average earnings¹), meaning that for many households market housing is not an option. Affordability issues are not equal across the district and in some places house prices are considerably higher than regional and national averages. The Strategic Housing Market Assessment, which was produced as evidence to inform the district's two Local Plans, identified a need for 94 affordable houses per year in the Suffolk Coastal Local Plan area and 208 affordable houses per year in the Waveney Local Plan area, giving a scale of the need for affordable housing.
- 1.2 The benefits of adequate affordable housing provision are not limited to being low cost to the occupants. Affordable housing also helps to provide long-term, safe and needs-appropriate housing for people whose needs are otherwise not met by housing that is available on the market.
- 1.3 Affordable housing is fundamental to support the district's health, a strong local economy and communities with more permanent, diverse, and

¹ Office for National Statistics, Median workplace earnings to median house price 2020 (published 25th March 2021)
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepriceto workplacebasedearningslowerquartileandmedian>

cohesive communities. Addressing the district's needs for affordable housing is therefore a corporate ambition of the Council, with both the Housing and the Planning services playing a key role in achieving higher rates of delivery and at a high build quality.

- 1.4 The Council's [Housing Strategy \(2017-2023\)](#)² sets out the Council's ambitions for increasing the provision of affordable housing and includes a priority of "Increasing the supply of new housing to meet a range of needs – a more proactive role for East Suffolk supporting the development of affordable homes".
- 1.5 The [Housing Development Strategy \(2020-2024\)](#)³ sets out the Council's approach to direct provision of affordable housing, setting out an action to develop and publish a 3-year rolling development programme with an objective of achieving at least 50 units per annum.
- 1.6 The [Housing Enabling Strategy \(2020-2025\)](#)⁴ sets out actions to proactively boost housing delivery, including affordable housing through working with communities and through the development of the Council's own assets.
- 1.7 Affordable housing is delivered through planning policies primarily through one of two ways – through policies that require a proportion of affordable housing as part of certain market housing developments (residential developments of 10 or more dwellings or 0.5 hectares or more in the Suffolk Coastal Local Plan area and of 11 or more dwellings in the Waveney Local Plan area) and through policies that provide support for affordable housing

² <https://www.eastsuffolk.gov.uk/assets/Housing/East-Suffolk-Housing-Strategy-2017-2023/East-Suffolk-Housing-Strategy-2017-23.pdf>

³ <https://www.paperturn-view.com/uk/east-suffolk/housing-development-strategy?pid=NzU75318&v=1.1>

⁴ <https://www.eastsuffolk.gov.uk/assets/Housing/Housing-Enabling-Strategy.pdf>



to come forward in certain circumstances as an exception to planning policies for housing (known as 'exception sites'). The latter may include community led housing developments. Affordable housing is also delivered on schemes brought forward for entirely affordable housing, or for a proportion larger than policy thresholds, usually by Registered Providers.

- 1.8 The [East Suffolk Council – Suffolk Coastal Local Plan \(September 2020\)](#)⁵ and the [East Suffolk Council – Waveney Local Plan \(March 2019\)](#)⁶ contain policies which seek to support and facilitate the delivery of affordable housing to address the needs for affordable housing that have been identified in the evidence base underpinning the production of the two Local Plans.
- 1.9 The need for affordable housing was assessed through the Strategic Housing Market Assessment⁷ (part 2) which underpins the affordable housing policies contained in the Local Plans. The Strategic Housing Market Assessment identified that in the Suffolk Coastal Local Plan area there is a need for affordable housing for 94 households per year and in the Waveney Local Plan area a need for affordable housing for 208 households per year, over the Plan period to 2036.

Purpose

- 1.10 The overarching aim of the SPD is to facilitate the delivery of affordable housing in accordance with the Local Plan policies. The guidance contained in this SPD will assist in the implementation of policies contained in the

⁵ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf>

⁶ <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf>

Local Plans for East Suffolk regarding affordable housing, and as an SPD this guidance will, when adopted, be a material consideration in determining applications for planning permission.

- 1.11 This SPD is adopted by East Suffolk Council and relates to the areas covered by the Suffolk Coastal Local Plan and the Waveney Local Plan. The Broads Authority, which covers part of the northernmost area of the district, are the planning authority for the Broads and have their own Local Plan (adopted May 2019)⁸. Policy DM34 of the Broads Local Plan sets out that affordable housing is required on sites of ten or more dwellings and commuted sums are required on sites of 6-9 dwellings, to be provided in accordance with the standards and policies of the relevant District Council (in this case, the Waveney Local Plan). Guidance contained within this SPD may therefore be relevant in the Broads Authority area.
- 1.12 The guidance in the SPD may also be relevant to the implementation of Neighbourhood Plan policies that relate to affordable housing.
- 1.13 This document provides guidance which will be relevant during the preparation and determination of any planning applications which involve affordable housing, or for which the Local Plan policies concerning affordable housing are relevant.
- 1.14 This Affordable Housing Supplementary Planning Document replaces the following documents:

⁷ Available at <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/>

⁸ https://www.broads-authority.gov.uk/data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf



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

Planning Policy

- 1.15 The East Suffolk Council Local Plans - the Suffolk Coastal Local Plan and the Waveney Local Plan (outside the Broads Authority who produce their own Local Plan) - as well as 'made' Neighbourhood Plans and the Minerals and Waste Local Plan produced by Suffolk County Council, form the development plan for the district. The delivery of affordable housing is a key element of the strategies of both Local Plans.
- 1.16 The Local Plans set out a spatial vision and strategies for the period to 2036. The key Local Plan policies to which this SPD relates are listed in Table 1.1 below.

Table 1.1 – key Local Plan policies

Local Plan Policies – Suffolk Coastal Local Plan

- SCLP5.10: Affordable Housing on Residential Developments
- SCLP5.11: Affordable Housing on Exception Sites

Local Plan Policies – Waveney Local Plan

- WLP8.2: Affordable Housing
- WLP8.6: Affordable Housing in the Countryside

- 1.17 Whilst the policies in the two Local Plans are founded on similar principles, i.e., they aim to secure affordable housing through residential development and provide opportunities for affordable housing to come forward on 'exception sites', there are differences in parts of the detail within each policy and these will be explained throughout the SPD.
- 1.18 Neighbourhood Plans may also set local policies on affordable housing, informed by local circumstances and evidence.
- 1.19 The guidance in this SPD has been written also with regard to the Government's most recent revision of the [National Planning Policy](#)



[Framework](#)⁹ (NPPF, 2021) and the relevant categories of the Planning Practice Guidance (PPG) to which the Council has regard as a material consideration in reaching decisions on planning applications. Of particular significance are NPPF Paragraphs 63, 64, 65, 72 and 78 and Annex 2, and the Planning Practice Guidance on '[Housing needs of different groups](#)'¹⁰, '[Build to Rent](#)'¹¹ and '[First Homes](#)'¹².

Role of the Council and other organisations

- 1.20 The Council has two important but distinct roles in the provision of affordable housing, as the local planning authority and as the housing authority.
- 1.21 As local planning authority, the Council has adopted Local Plans setting out requirements and policies to support the provision of affordable housing and will determine planning applications and lead on the preparation of Section 106 agreements.
- 1.22 As the housing authority, the Council will provide advice on local housing need, input into the preparation of legal agreements, allocate dwellings to eligible households and, in some cases, own and manage affordable housing stock. The Council also takes a proactive role in developing affordable housing and working with Registered Providers and communities to support and facilitate the delivery of affordable housing. This can involve the direct

development of affordable housing, delivery through renovation, or the regeneration of wider areas which can include affordable housing delivery. The Council's private sector housing service also has a role in restoring empty homes which may also be used for affordable housing.

- 1.23 Other Registered Providers of affordable housing are Housing Associations, a number of which operate in East Suffolk. Registered Providers may develop their own stock or purchase affordable dwellings, or land, that becomes available on residential sites.
- 1.24 Affordable housing may also be developed and retained by community led housing (CLH) organisations. CLH groups can become Registered Providers with the Regulator of Social Housing.

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

¹⁰ <https://www.gov.uk/guidance/housing-needs-of-different-groups#addressing-the-need-for-different-types-of-housing>

¹¹ <https://www.gov.uk/guidance/build-to-rent>

¹² <https://www.gov.uk/guidance/first-homes>

2. Types of Affordable Housing





2. Types of Affordable Housing

- 2.1 Affordable housing is defined in the glossary (Annex 2) of the 2021 National Planning Policy Framework (NPPF), and can broadly be split into two groups – affordable housing for rent and affordable housing for purchase.

Affordable Housing Tenures

Affordable rent and social rent

- 2.2 Affordable rent and social rent are affordable housing that meets all of the conditions set under the definition of affordable housing for rent contained in the glossary, which are:

“...(a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);

Social rent is set at a lower monthly cost than affordable rent, typically around 50% - 60% of market rental costs, capped at the Local Housing Allowance, and is calculated through a formula published by the Government.

Affordable rented properties must not exceed 80% of the open market rental value. Affordable rental properties are usually owned and managed by a Registered Provider but could be owned and managed by the Council.

(b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and

(c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)”.

- 2.3 Affordable housing for rent should be provided by a Registered Provider, which includes Housing Associations, community led housing groups (where registered with the Regulator of Social Housing) and the Council. Affordable housing for rent is allocated based on housing need which identified via the Gateway to Homechoice register (a choice based letting model)¹³. Whilst social rent provides lower cost dwellings for future occupants, the return is lower which can have an impact on the viability of the development. The majority of new affordable housing for rent is the affordable rent tenure rather than social rent.

Shared Ownership

- 2.4 Shared Ownership properties enable occupants to buy a share of a property, whilst paying rent and service charges on the remaining value. The initial share bought is between 10-75% with options to purchase additional shares as these become affordable to the occupant. Further

¹³ www.eastsuffolk.gov.uk/housing/affordable-housing/



information on the operation of Shared Ownership can be viewed on the [Government's shared ownership website](#)¹⁴.

Shared Equity

- 2.5 Shared equity allows purchasers to buy between 70-80% of the property. Shared Equity is often sold on a freehold basis with the discount protected by a charge. They will need at least 15% deposit but pay no rent on the unsold equity. This remains with the property owner, which is usually a private developer. Homeowners can buy the remaining equity after 2 years. The funds from additional equity bought should be retained by the Registered Provider and be used for future affordable housing schemes in the district.

Discounted home ownership

- 2.6 Discounted home ownership / discounted market sales housing are terms describing housing which is sold freehold at a value of up to 80% market value. There is no rent to pay on the remaining share, however the discount would be applied at the same proportion in any future re-sale.

Starter Homes

- 2.7 Starter Homes were introduced in the Housing and Planning Act 2016 and are offered at a minimum of 20% discount below open market value up to a value of £250,000, and to those with a maximum income of £80,000. They are available for first-time buyers under the age of 40 and if sold within 15 years the discount would need to be repaid. Starter Homes do not, therefore, remain affordable in perpetuity. The anticipated secondary

legislation has not come forward and the Government has subsequently introduced First Homes as a new tenure aimed at first time buyers.

Rent to Buy

- 2.8 Rent to Buy enables occupants to rent a property at 20% below the open market rent, in order to save for a deposit to purchase the home in the future. Rent to Buy is an affordable ownership tenure and not a rental tenure, as the purpose is to provide an opportunity ultimately for affordable home ownership.

First Homes

- 2.9 First Homes were introduced on 28th June 2021 as a specific type of discounted market sales housing. First Homes are available to purchase with a minimum discount of 30% below market value, with the discount retained in perpetuity whilst the initial sale price must not exceed £250,000. As with Starter Homes, they are available to first time buyers with an annual household income not exceeding £80,000. The Government is requiring that 25% of homes delivered through developer contributions are First Homes. The Government has published [Planning Practice Guidance on First Homes](#)¹⁵.
- 2.10 Housing, which may be viewed as 'affordable' (i.e. it is cheaper in some way than market housing) but which is not contained in the definition of affordable housing in the NPPF (along with First Homes which is a new tenure established through the introduction of Planning Practice Guidance) is not affordable housing and would not be considered as such in terms of applying the policies of the Local Plans. Service Family Accommodation, for

¹⁴ www.gov.uk/affordable-home-ownership-schemes/shared-ownership-scheme

¹⁵ <https://www.gov.uk/guidance/first-homes>



housing Ministry of Defence personnel and their families, is governed by nationally set rental rates which are below market rent. However, it does not fall within the NPPF definition of affordable housing and the provision of affordable housing on such developments would be considered on a case by case basis under the policies in the Local Plans.

Community led affordable housing

- 2.11 Community groups can bring forward affordable housing, often as 'exception sites' on the edge of settlements, as stand-alone projects, whereby the community group own and manage the homes, or work in partnership with a housing association.
- 2.12 Neighbourhood Plans may also have a role in the development of affordable housing. The Council is separately producing guidance for Neighbourhood Planning groups on the benefits and opportunities of planning for new housing, including affordable housing, in their plans.

Community-Led Housing

- 2.13 Community-Led Housing provides a route for delivery of affordable housing to meet the needs of the community. Community Led Housing is a term for projects that share these principles:
- The community is integrally involved throughout the process in key decisions such as what housing is provided and where.
 - There is a presumption that the community group will take a long-term formal role in the support, ownership, stewardship or management of the homes.

- The benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity via a non-profit company with an asset lock.
- The community does not necessarily have to initiate the project and does not have to build the homes themselves.

There are three main models followed in the provision of Community-Led Housing:

- Community Land Trusts
- Cooperative Housing Societies
- Cohousing

Community Land Trusts

- 2.14 Community Land Trusts (CLTs) are set up and run by communities to develop and manage homes, as well as other assets important to that community, such as community enterprises, food growing or workspaces. CLTs act as long-term stewards of the housing to ensure the homes remain affordable for future generations based on what local people earn rather than land values. The Right to Buy does not apply to housing delivered through a Community Land Trust.
- 2.15 CLTs use democratic governance structures based on a non-profit company to protect the homes and infrastructure via an 'asset lock'. The Council will provide support to CLTs providing they are in line with the definition as per the Housing and Regeneration Act (2008).



Co-operative Housing Societies

- 2.16 Co-operative Housing Societies are non-profit organisations that seek to meet the needs of their members. Like Community Land Trusts, Co-operative Housing Societies deliver affordable housing for rent or home ownership as well as other assets such as space for employment, recreation and growing food. Under this model there is joint ownership and management of land and assets. Cooperative Housing Societies are exempt in law from the Right to Buy.

Cohousing

- 2.17 Cohousing communities are created, owned and run by their residents. Each household has a self-contained, private home (rented or purchased) as well as shared community facilities and spaces (e.g. a shared laundry room, a common house, guest accommodation, community allotments, etc.). Residents collectively manage the community. Cohousing is a particularly relevant model for single-person households whom may otherwise be vulnerable to the adverse health impacts of social isolation, and whom feel a strong community connection is important to them for their wellbeing and quality of life. However, Cohousing is also a highly suitable model for larger households and households with children.
- 2.18 Cohousing schemes are intentional communities whereby members agree to abide by a set of agreed values. Cohousing is not an affordable housing model but can deliver homes for affordable rent or home ownership tenures in perpetuity. Clarity about tenures would be required as part of the early consultation with the Council to ensure the correct advice is given.

- 2.19 Through its Housing Enabling role, the Council provides support and guidance on community led housing initiatives. It is likely that most community led housing developments will come forward as exception sites. Such proposals would need to be supported by evidence of housing need (see Chapter 8) and details of how the affordable housing will be protected in perpetuity would be required. A Section 106 agreement would be expected to be agreed as part of the planning application. Community groups can request specific advice from the Council's Housing Enabling Team (see Chapter 6).

Affordable Self Build and Custom Build Housing

- 2.20 Self-build and custom-build housing is not, by definition, affordable housing, albeit that it can provide an opportunity for some cost savings where future occupants undertake a degree of work themselves (often known as 'sweat equity').
- 2.21 Self-build and custom-build housing has its legal basis in the Self Build and Custom Housebuilding Act 2015 and is defined in the NPPF as:

"Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-Build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that act."

It is only 'affordable housing' by definition if it is delivered in a manner that meets with the definition of affordable housing (see sub-section 'Affordable Housing Tenures' above for definitions).



- 2.22 The Council is actively supporting and facilitating the delivery of self-build and custom-build housing, including through its Housing Enabling Strategy as well as through policies in its Local Plans. In principle the Council will support the development of affordable self/custom build schemes where they are in accordance with relevant Local Plan or Neighbourhood Plan policies.
- 2.23 The delivery of affordable self-build and custom-build properties is, by its very nature, more complex than the delivery of either affordable housing or self and custom-build housing. For example, occupants of affordable housing would usually not be identified until later in the development process and consideration would therefore need to be given to identifying occupants earlier on to ensure that they can have an appropriate level of input into the design and construction of the dwellings.
- 2.24 Affordable self-build and custom-build housing could however be delivered through a number of means, including:
1. A Registered Provider constructing a 'shell' which can be completed by the occupant under a Shared Ownership arrangement.
 2. Transfer of a 'shell' from a developer to a Registered Provider with the future occupant undertaking work to finish the property.
 3. A Registered Provider delivering homes for rent, with future occupants having an input to the design and/or assisting with elements of the construction process.
 4. Development initiated or commissioned by community led housing groups, with future occupants involved in the design and construction process.
5. The provision of serviced plots that are below market value.
- 2.25 Affordable custom-build, rather than self-build, may be more feasible in instances where a number of properties are being developed and managed under a Registered Provider, where future occupants can customise the property in accordance with their requirements.
- 2.26 A legal agreement (Section 106 agreement) will ensure that the self-build properties remain affordable. The prospective occupants may also be expected to meet relevant eligibility criteria, as set out in the Section 106 Model Heads of Terms and Template Clauses in Appendix 2.
- 2.27 Where affordable self-build or affordable custom-build is to be delivered on Exception Sites it is expected that a local need for affordable housing (see Chapter 6) as well as a local aspiration to deliver this as self and/or custom build will have been identified.
- 2.28 For self-build properties that are built as a form of discounted market sales housing, the discount to the occupant and future occupants would need to comply with national policy on affordable housing and would be secured through the Section 106 agreement. This is at least 20% below market value for discounted market sale properties and other low-cost homes for sale and at least 30% below market value for First Homes.
- 2.29 The Council's Local Plan policies which require a proportion of affordable housing to be provided as part of residential development (SCLP5.10 and WLP8.2) apply to development of solely self-build / custom-build developments as well as to other housing proposals. The Council's Local Plan policies are clear that self-build and custom-build housing will only be supported where in compliance with all other relevant Local Plan



policies and self and custom build developments will therefore be expected to provide the required amount of affordable housing.

2.30 The Council will expect provision to be made on-site, however it may consider a commuted sum in exceptional circumstances where provision on site is not viable.

2.31 Affordable self and custom-build dwellings will need to meet the definition of affordable housing set out in the NPPF – whilst there are usually some cost saving benefits from self and custom-build these benefits by themselves do not meet with the definition of affordable housing. It is expected that the tenure mix of the affordable self build properties would meet the requirements of policies SCLP5.10 and WLP8.2, including the Government's requirement for 25% of affordable housing to be First Homes. Paragraph 65 of the NPPF sets out that exemptions should be made to the policy requiring at least 10% of the total number of homes on the site to be available for home ownership in the case of development proposed to be developed by people who wish to build or commission their own homes (as well as other circumstances). However, this does not preclude affordable self and custom build units coming forward for ownership tenures and the Council's Local Plan policies on provision of affordable housing do not set out an alternative approach for self and custom build affordable properties.

2.32 The Council will expect the applicant to set out how the affordable dwellings will be delivered. Mechanisms for this can include:

- Land offered to Registered Providers for the delivery of the affordable self-build or custom-build plots.

- The sale of plots at below market value with the reduction in market value captured through the Section 106 agreement. The developer / applicant should put forward a mechanism for securing the discount in perpetuity.

In circumstances where the Council agrees that reasonable steps have been taken to secure provision of the affordable dwellings as self-build or custom-build, and where there is clear evidence that no Registered Provider has been willing to take on the affordable self build element, affordable housing units can be built by the developer and transferred to a Registered Provider.

2.33 A Design Code will usually be secured for self-build developments, and this will also apply to groups of affordable self-build units on the site.

3. Identifying an Appropriate Mix of Affordable Housing

Key Local & National Policies

Suffolk Coastal Local Plan (2020) polices:

- SCLP5.10 Affordable Housing on Residential Developments

Waveney Local Plan (2019) policies:

- WLP8.2 Affordable Housing

NPPF (2021) and National Guidance:

- Planning Practice Guidance on First Homes



3. Identifying an Appropriate Mix of Affordable Housing

- 3.1 Policy SCLP5.10 and Policy WLP8.2 set out the tenures of affordable housing that are expected to be provided on residential sites which trigger the need for affordable housing:

Table 3.1 – Affordable housing requirements of Local Plan policies (see also paragraphs 3.7 – 3.14 on application of the Planning Practice Guidance on First Homes)

	Threshold	Requirement	Tenure
Suffolk Coastal Local Plan (SCLP5.10)	<ul style="list-style-type: none">10 dwellings or more and sites of 0.5ha or more	<ul style="list-style-type: none">1 in 3 – applies to whole plan area	<ul style="list-style-type: none">50% affordable rent / social rent25% shared ownership25% discounted home ownership
Waveney Local Plan (WLP8.2)	<ul style="list-style-type: none">11 dwellings or more	<ul style="list-style-type: none">20% in Lowestoft and Kessingland (excluding Corton)40% in Southwold and Reydon30% elsewhere	<ul style="list-style-type: none">50% affordable rent

- 3.2 These tenures have been informed by the Strategic Housing Market Assessment¹⁶ which was produced to inform the preparation of the Local Plans, in line with the requirements of the National Planning Policy Framework (NPPF).
- 3.3 The Strategic Housing Market Assessment provides an assessment of affordable housing need for each plan area and for the plan period. As well as informing the tenures set out in the policies, the Strategic Housing Market Assessment provides a further, detailed breakdown by Local Plan area of the size of properties needed within different tenures, including affordable tenures. As a key piece of evidence, the Strategic Housing Market

Assessment should be used to inform an appropriate mix of affordable housing, along with other considerations as set out further below. The needs in the Strategic Housing Market Assessment cover the Local Plan areas and the Local Plan period up to 2036 and will therefore be particularly relevant on larger sites that will be meeting a wider affordable housing need.

- 3.4 The tenure and size of affordable housing needed for the Suffolk Coastal Local Plan area is set out in Appendix 4 of the Strategic Housing Market Assessment – Part 2 Partial Update (January 2019). The results relating to the 2014-based household projections relate most closely to the local plan

¹⁶ For the Waveney Local Plan area - <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-2.pdf>

For the Suffolk Coastal Local Plan area - <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/SHMA-Part-2-update-2019.pdf> (2014-based outputs)



housing requirement and it is these outputs that should be used. Tables 4.2f to 4.8f set out the requirements across different tenures.

- 3.5 The tenure and size of affordable housing needed for the Waveney Local Plan area is set out in Chapter 4 of the Strategic Housing Market Assessment – Part 2 (May 2017). Tables 4.2b to 4.8b set out the requirements across different tenures. Policy WLP8.2 states that of the affordable housing required on sites of 11 or more 50% should be for affordable rent. It is expected that, aligned with paragraph 8.12 of the Local Plan, the remainder would be affordable ownership tenures.
- 3.6 The relevant tables from the Strategic Housing Market Assessment are copied into Appendix 1, for ease of reference, however the full Strategic Housing Market Assessment reports should be referred to for context.

First Homes

- 3.7 The Government's First Homes policy came into force on 28th June 2021. The Planning Practice Guidance on First Homes¹⁷ states that First Homes are a specific type of discounted market sale housing and the Government's preferred discounted market tenure. The PPG suggests that 25% of all affordable housing delivered through developer obligations should be First Homes including where a local planning authority has adopted Development Plan policies which specify the expected mix of affordable housing tenures, as is the case with East Suffolk Council's Local Plans. The PPG does not displace the statutory presumption in favour of the Development Plan but is a material consideration in the Council's decision-making. The Strategic Housing Market Assessment assessed the need for different tenures of affordable housing over the plan period but did not

consider whether there was a need for First Homes as this tenure didn't exist at the time. The SHMA did however identify a need for discounted market housing and Starter Homes. In Policy SCLP5.10 the results of the SHMA have informed the policy requirement for 25% of the affordable housing to be for discounted home ownership, although the policy itself does not require any particular type of discounted market housing. Policy WLP8.2 does not set out proportions for affordable home ownership tenures, however the SHMA assessed that just over 20% of the need for affordable housing was for Starter Homes / discounted market dwellings.

- 3.8 The PPG suggests that once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan and that the remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy. In the case of the Local Plans, however, Policy SCLP5.10 already requires 25% of affordable housing to be delivered as 'discounted home ownership' without further specifying what types of such housing are required. The Council considers that, as First Homes are a specific type of discount market tenure, the delivery of 25% First Homes in accordance with the PPG will accord with and fulfil the requirement in Policy SCLP5.10 to deliver 25% discounted home ownership. The only requirement in Policy WLP8.2 is that 50% of affordable housing be delivered as affordable rent which will not be compromised by the delivery of 25% First Homes. The Council will therefore expect schemes to deliver the following mix. In the Suffolk Coastal Local Plan area, schemes will be expected to deliver 25% First Homes (which will fulfil the requirement to deliver 25% discounted home ownership), 50% affordable rent / social rent and 25% Shared Ownership. This will accord with the PPG requirement to deliver 25% First Homes and with the mix specified by Policy SCLP5.10. In the Waveney Local

¹⁷ <https://www.gov.uk/guidance/first-homes>



Plan area, schemes will be expected to deliver 25% First Homes and 50% affordable rent. Again, this will accord with the PPG requirement to deliver 25% First Homes and accord with the requirements of Policy WLP8.2.

- 3.9 Around 27% of the need for affordable housing in the Waveney area was assessed as being for Shared Ownership properties and the Council will therefore still expect the provision of Shared Ownership alongside First Homes.
- 3.10 This means that, in the Suffolk Coastal Local Plan area, other forms of discounted home ownership than First Homes are not expected to come forward under Policy SCLP5.10. However, the proposed approach will ensure compliance with both the PPG and the mix specified by Policy SCLP 5.10. It ensures that 25% of affordable housing is delivered as First Homes as the Government's preferred form of discounted market tenure whilst also ensuring that the need for affordable rented properties and Shared Ownership properties, as evidenced by the Council's Strategic Housing Market Assessment¹⁸, is addressed in accordance with adopted Local Plan policies. The PPG sets out that social rent should be delivered in the same percentage as set out in the Local Plan, and this approach also safeguards the provision of any social rent which may come forward under SCLP5.10.
- 3.11 The price cap (£250,000 as set out in the PPG) should be viewed as just that, a cap, and in accordance with the guidance in the Planning Practice Guidance the Council will expect that the size of First Homes reflects affordable needs, in particular acknowledging that the median house price in East Suffolk in 2020 was £245,000¹⁹.

¹⁸ www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-2.pdf

- 3.12 Occupants of First Homes will be required to meet eligibility criteria, as set out in the Model Heads of Terms and Template Clauses in Appendix 2.
- 3.13 In accordance with the transitional measures set out in the Planning Practice Guidance, the First Homes requirement will not apply to the following:
- sites with full or outline planning permissions already in place or determined (or where a right to appeal against non-determination has arisen) before 28 December 2021;
 - applications for full or outline planning permission where there has been significant pre-application engagement which are determined before 28 March 2022;
 - sites where local and neighbourhood plans are adopted/made under the transitional arrangements, as detailed in paragraphs 18 and 19 of the PPG.
- 3.14 Developments of specialist housing which are required to provide affordable housing under Policy SCLP5.10 and Policy WLP8.2 will not need to provide First Homes as part of the tenure mix, where that specialist accommodation will usually be occupied by older persons rather than first time buyers.

Other considerations

- 3.15 It should also be recognised that needs may change over time or there may be particular needs for certain types of affordable properties in a specific

¹⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian> (data published 25th March 2021)



location, and this is acknowledged in the Local Plans. For this reason, the Housing Register or other evidence of local needs should be also considered alongside the Strategic Housing Market Assessment. The Housing Enabling Team can be contacted for guidance and for information on the data held on the Housing Register.

- 3.16 The Housing Register, managed through Gateway to Homechoice, provides details of those currently in need of affordable housing who have registered. The Gateway to Homechoice register does not register need for affordable home ownership dwellings, however, need for such tenures can be identified through the Help to Buy Agents²⁰ and/or through Registered Providers.
- 3.17 For relatively small sites where a proportion of affordable housing is required, the evidence of local need on the Housing Register may significantly influence the affordable housing mix (noting that the overall tenures would be expected to be in line with the adopted planning policies). However, it is particularly important that proposals on large and strategic sites, that may deliver over a longer period of time and meet wider than local needs, seek to address the needs identified in the Strategic Housing Market Assessment and are not solely informed by consideration of current local needs for affordable housing.
- 3.18 There may also be site specific considerations that inform the mix of affordable housing, for example the proximity of a site to a school may support a greater focus on family-sized homes. The location and nature of a site, and how an appropriate design responds to that location, may also influence the mix. In addition, Chapter 7 (Design) provides guidance on the

appropriate distribution and placement of affordable homes on larger mixed-tenure sites.

- 3.19 Neighbourhood Plans may set their own policies on affordable housing mix, informed by local evidence, and in such circumstances the affordable housing mix would be expected to reflect the Neighbourhood Plan policy.
- 3.20 The advice of the Council's Housing Enabling Team will be sought in responding to pre-application requests and in considering relevant planning applications, outlining the amount, tenure, type and size of affordable units that would be expected on a site.
- 3.21 On exception sites, the principle behind such proposals being acceptable is that they will be meeting a local need for affordable housing that cannot be met through existing housing allocations. For such proposals, the responsibility is therefore on the applicant to demonstrate that a local need for affordable housing exists and will be addressed through the proposed scheme. Further guidance on exception sites is contained in Chapter 6 and guidance on undertaking a local housing needs assessment is contained in Chapter 8.

Specialist Housing

- 3.22 Both Local Plans recognise that the district has an ageing population, and seek to provide for a mix of housing that will better meet the needs of older people. A part of this approach is supporting the appropriate provision of specialist housing. Needs for specialist housing were assessed through the Strategic Housing Market Assessment as part of the preparation of the Local

²⁰ <https://www.onthemarket.com/help-to-buy/>



Plans. The Strategic Housing Market Assessment assessed needs for the following types of accommodation:

- Sheltered housing
- Enhanced sheltered housing
- Extra care housing
- Residential care (nursing and residential care homes)

- 3.23 The Suffolk Coastal Local Plan further breaks the needs down into market and affordable needs, demonstrating a need for a total of 95 affordable sheltered, 53 affordable extra care units and 424 affordable residential care units over the plan period (Table 5.3 of the Local Plan).
- 3.24 Residential care will fall within Use Class C2 Residential Institutions. Other forms of specialist housing may fall within Use Class C2, however this is not always the case and will depend on the level of care to be provided. It has been determined in the courts that Class C2 can include accommodation in the form of dwellings, for example flats and bungalows, each of which have facilities appropriate for private, or independent, domestic existence, in circumstances where care is provided for an occupant in each dwelling who was in need of care as defined in Article 2 of the Use Classes Order. The accommodation must also be capable of being collectively described as a residential institution.
- 3.25 Proposals for C2 uses, other than for residential care/nursing homes, will be expected to apply the requirements for affordable housing set out under policies SCLP5.10 and WLP8.2. These Local Plan policies do not distinguish

between housing development falling within either Use Class C2 or C3 in this respect.

- 3.26 Policy SCLP5.10 of the Suffolk Coastal Local Plan expects that affordable housing to meet the needs of older people will form part of the mix of affordable housing that is provided on residential development. Policy WLP8.2 of the Waveney Local Plan states that sheltered and extra care housing should be included as affordable units where needed and where practicable. Consideration should therefore be given to whether, on non-specialist developments, there are any needs for affordable specialist housing that could be provided as part of the affordable mix. On specialist developments the affordable housing is expected to be specialist. Local needs for specialist housing can be identified through the Council's Gateway to Homechoice housing register. Evidence may also be available through the Council's Older Persons Housing Strategy which is currently being developed.
- 3.27 The Government has introduced Optional Technical Standards for accessible and adaptable dwellings (Part M4(2)) and wheelchair user dwellings (Part M4(3)). Whilst these standards are set out in Part M of the Building Regulations, they can only be required through the planning system.
- 3.28 A proportion of dwellings constructed to M4(2) standards are required under Policy SCLP5.8 'Housing Mix' (at least 50%) and Policy WLP8.31 'Lifetime Design' (at least 40%) and as set out in Chapter 7 'Design' it is expected that a higher proportion of the M4(2) properties would be distributed to the affordable housing reflecting that generally there are higher levels of disability in those who need affordable housing²¹. The

²¹www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019



proportions would be informed through engagement with the Housing Enabling Team. Policy SCLP5.8 also expects all new specialist dwellings to be built to M4(2) standards.

- 3.29 There is evidence on the Council's Housing Register of need for wheelchair accessible accommodation and therefore in some circumstances the Council may ask for a proportion of affordable properties to be constructed to M4(3) standards as part of the provision of affordable housing under Policies SCLP5.10 and WLP8.2. Wheelchair user dwellings should be designed to assist residents with mobility impairments. They should include step free access to the entrance level and outdoor spaces, easy access from vehicle to dwelling, and wet rooms. There is a need, as evidenced by the Gateway to Homechoice register, for one and two bedroom homes as well as family size housing to cater for families with disabled household members. The Council will accept M4(3) flats or bungalows as appropriate.
- 3.30 The Council is aware of the additional costs associated with building to M4(3) standards and where an applicant considers that such provision would result in viability issues, the Council would request the applicant submit a viability report in accordance with the guidance set out in the appendices of the Local Plans. In circumstances where there is an identified need for M4(3) affordable properties and the Council is satisfied that as a result delivery of the full policy compliant amount of affordable housing cannot be achieved for viability reasons, the Council will consider whether

the loss of a proportionate number of affordable homes would be acceptable in order to secure some affordable M4(3) properties.

Build to Rent

- 3.31 The Planning Practice Guidance on Build to Rent²² contains specific guidance on the provision of affordable housing. This explains that, on such schemes, affordable housing should be provided in the form of affordable private rent, at least 20% below market rent values. The Planning Practice Guidance explains that the affordable and market rent units should be managed collectively by a single build to rent landlord, rather than through a Registered Provider of affordable housing.
- 3.32 The Planning Practice Guidance on Build to Rent sets out that 20% is generally a suitable benchmark for the level of affordable private rented homes to be provided. The Council's Local Plan policies SCLP5.10 and WLP8.2 set out the proportions and tenure mix of affordable housing that are expected to be provided on residential developments (see table 3.1 above). In accordance with paragraph 65 of the NPPF, the Council is not able to require proposals for Build to Rent schemes to provide affordable housing for ownership tenures. As the policies do not set different thresholds for build to rent schemes it is expected that the relevant proportion of affordable housing will still be achieved, unless exceptional circumstances are demonstrated as set out in the policies, but this will be affordable housing for rent.

²² <https://www.gov.uk/guidance/build-to-rent>

4. Section 106 Agreements





4. Section 106 Agreements

- 4.1 Policy SCLP5.10 and Policy WLP8.2 set out requirements for a proportion of affordable housing to be provided as part of residential developments, whilst Policy SCLP5.11 and Policy WLP8.6 provide opportunities for affordable housing to come forward on exception sites. Permission for affordable housing may also be granted on other sites, for example within the Settlement Boundary.
- 4.2 Where affordable housing forms part of a development proposal, it will be secured through a Section 106 legal agreement (also known as a planning obligation). A Section 106 agreement, which takes its name from the relevant section of the Town and Country Planning Act 1990, is a legal agreement between the Council and a developer or applicant (and in some cases other parties). A Section 106 agreement is used to secure measures which are necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. A Section 106 agreement is bound to the land and the development itself, rather than to the signatory, and will therefore continue to apply once land or dwellings are sold on.
- 4.3 A Section 106 agreement will be finalised after a resolution to grant planning permission, and the issuing of the planning permission is therefore dependent upon the completion of the Section 106 agreement.
- 4.4 A Section 106 agreement will cover a number of matters in relation to affordable housing, including:
- The number of affordable dwellings;
 - The type, tenure and size (number of bedrooms) of dwellings;
 - Arrangements for ensuring that the housing remains affordable in perpetuity;
 - Phasing of the completion of dwellings;
 - How the affordable housing will be achieved e.g. through construction and transfer of units;
 - Occupancy criteria;
 - A mortgagee in possession clause
- 4.5 Whilst the Local Plan policies expect affordable housing provision to be made on-site, in some exceptional circumstances a financial contribution towards off-site provision of affordable housing may be agreed during the consideration of a planning application. Where this is the case the Section 106 agreement will be used to secure an off-site contribution. These contributions, known as commuted sums, are explained in more detail in Chapter 5.
- 4.6 The provision of guidance on Section 106 agreements in this Supplementary Planning Document, including the Model Heads of Terms and Template Clauses (see Appendix 2), is aimed at providing an efficient and consistent approach to the preparation of Section 106 agreements. This will help to support necessary legal agreements to be secured in a timely manner, and to support the delivery of housing.

Pre-application advice

- 4.7 In order for the Section 106 agreement preparation process to run smoothly, it is important that applicants give early consideration to the delivery of affordable housing.



- 4.8 It is important to engage with the Council's pre-application advice service to obtain advice in relation to affordable housing need and the types of dwellings that should be provided. This will help to reduce the potential need for changes to the design and the affordable housing provision over the course of the determination of the planning application. The advice of the Council's Housing Enabling Team on affordable housing needs will be sought as part of the pre-application response.
- 4.9 A Registered Provider of Affordable Housing will ultimately take on the ownership / management of the affordable housing (other than for some discounted market sale tenures). The Council supports the delivery of affordable housing via Community Led Housing groups. However, to manage affordable rented housing, they would need to become a Registered Provider or enter into a management agreement with a Registered Provider, either the Council or a Housing Association operating in the district.
- 4.10 The Model Heads of Terms require that a contract should be entered into with a Registered Provider, or evidence provided to demonstrate that negotiations are in hand, prior to occupation of 40% of the market dwellings on the development. The Affordable Housing Scheme, that will be required under the Section 106 agreement, should include details of the Registered Provider, where known. Whilst it is understood that the needs and circumstances of Registered Providers can change over the course of the evolution of a development, and that formally tying in a Registered Provider at an early stage can lead to abortive work, early engagement will nevertheless reduce the risk and degree of changes that may need to be made later on. Engagement on matters such as the design, type, size, layout and distribution of the affordable units is important in maximising the likelihood that a Registered Provider will wish to take on the affordable units at a later stage. Whilst this is crucial for all sites, for small

sites which will take less time to construct and therefore where the affordable element is likely to come forward sooner, it is even more imperative that early engagement takes place with Registered Providers.

Planning application stage

- 4.11 At the planning application stage, including at outline stage, information on the types, sizes, location and tenure of affordable housing proposed should be submitted. At the detailed application stage (full or reserved matters) the applicant should clearly specify the plots which are proposed as affordable housing, including proposed tenures, sizes and which dwellings are to be built to M4(2) or M4(3) (if applicable) standard. For outline applications, percentages rather than absolute numbers would be acceptable where this is still to be confirmed at reserved matters stage. It is recognised that at outline stage indicative locations of dwellings may be submitted. Whilst this may not form part of the determination, the Council may put an informative on the decision notice to highlight this with the expectation this would be taken into account in the preparation of the subsequent reserved matters application(s). Where, on large sites, delivery of affordable housing is to be phased, details of the proposed phasing should be submitted.
- 4.12 The Council's Local Validation List (current version dated October 2020) sets out the requirement for submission of an Affordable Housing Statement with a planning application which includes affordable housing (or one for which affordable housing would be required by the Council's policies). The Affordable Housing Statement will ideally be submitted as a standalone document.



- 4.13 Community Led Housing groups seeking to bring forward affordable housing schemes are encouraged to discuss their project with planning and housing enabling officers at the earliest opportunity.

Model Heads of Terms

- 4.14 Model Heads of Terms and Template Clauses are included in Appendix 2. These are the standard terms under which the Council expects to enter into through Section 106 agreements. Deviation from the Model Heads of Terms and Template Clauses will only be accepted where justified and in exceptional circumstances. This might include some circumstances where affordable housing is brought forward other than as required as part of a market housing development or as an exception site.

Occupancy and allocation

- 4.15 A Section 106 agreement will set out the mechanisms for the occupancy and allocation of affordable properties.
- 4.16 Nomination rights provide for the Council to nominate eligible persons for occupation of affordable dwellings for rent (see paragraph 16 of Model Heads of Terms). The Council's housing service maintains (along with other partners in the Gateway to Home Choice partnership) a Housing Allocations Policy which sets out the way in which properties will be provided to eligible households. Those identified as being in most need will receive priority, within the terms of the Section 106 agreement. Nomination agreements are between the Council and Registered Providers. For specialist housing, nominations are via Adult Social Care, Suffolk County Council.
- 4.17 For forms of discounted market sale housing, the Model Heads of Terms require the owner to agree a procedure with the Council for verifying purchasers prior to commencement. The Council is drafting a process for

this which will be published on its website. It is not expected that the Council would undertake the task of verifying potential occupants (in relation to First Homes the Council is anticipating a prescribed procedure from the Department of Levelling Up, Homes and Communities).

- 4.18 The Local Connections Cascade, set out in Appendix 2, provides a mechanism for allocating affordable housing to people who have a strong local and/or work connection. This will be applied, as appropriate, to affordable housing delivered through a planning obligation.

Deviating from the Model Heads of Terms and template clauses

- 4.19 As set out above, the Council will expect the Model Heads of Terms and Template Clauses to be applied in all circumstances. However, there may be exceptional circumstances where the Council agree to an alternative approach. Should a developer or applicant need to propose an alternative approach the Council will consider that proposal against the following principles:

- Any alternative approach must be necessary for securing the required affordable housing;
- The applicant or developer must provide robust evidence that the affordable housing could not be developed or be retained satisfactorily under the Council's Model Heads of Terms and Template Clauses.

First Homes

- 4.20 The Government has published template clauses in relation to First Homes which the Council has integrated, where appropriate, into its Model Heads of Terms and Template Clauses. Under the First Homes arrangements, the



local authority will be responsible for certifying potential occupiers qualify to purchase a First Home.

- 4.21 In terms of phasing, as First Homes would usually be purchased on a property by property basis by occupants (in the same way as market homes are), on larger sites where affordable provision is to come forward in phases the Council would expect First Homes to be spread across phases to ensure continuation of supply and reduce the risk of First Homes reverting to market dwellings.

Varying a Section 106 agreement

- 4.22 The Council recognises that circumstances may change over the course of the development of a site and therefore some flexibility for varying terms of an agreed Section 106 agreement is acknowledged within the Model Heads of Terms, however this can cause uncertainty for communities and will only be agreed to where absolutely necessary.
- 4.23 Where a developer wishes to vary the number or mix of affordable dwellings set out in a Section 106 agreement, which would result in a lower or non-policy compliant provision of affordable housing, the Council will require a viability assessment to be submitted in accordance with the requirements set out in the appendices of the two Local Plans.
- 4.24 The Model Heads of Terms (paragraph 14) set out that the Section 106 agreement should include provisions for circumstances where a Registered Provider cannot be found. The term 'reasonable endeavours' is used. The Council will come to a view as to whether reasonable endeavours have been made, and the party seeking to negotiate the terms of the Section 106 agreement will be expected to demonstrate that they have made proactive

²³ <https://www.eastsuffolk.gov.uk/housing/affordable-housing/registered-housing-providers/>

contact with at least five Registered Providers who operate and are actively seeking new housing stock within Suffolk and/or the surrounding area to establish whether they would be interested in taking on the affordable dwellings. The Council provides a list of Registered Providers on its [website](#)²³. The Council would expect to see evidence of contact made with Registered Providers, with reasonable offers sought. Following the submission of evidence and prior to any renegotiations of the Section 106, the Council may consider acquiring the homes for inclusion with the Housing Revenue Account portfolio.

- 4.25 Other options could include allowing payment of a commuted sum, providing serviced land at no cost to the Local Authority for development at a later time or the developer providing a reduced number of affordable units at no cost to a Housing Association.
- 4.26 The Model Heads of Terms also include provision for a Registered Provider to convert the tenure of the affordable housing where there are no prospective occupants after a period of 3 months from handover (paragraph 15). In such circumstances the Council will require evidence to be submitted to the satisfaction of the Council, explaining how the dwellings have been marketed and how prospective occupants have been sought.
- 4.27 In the circumstances outlined in the paragraphs above, the Council will consider the precise steps on a case by case basis.

Build to Rent

- 4.28 Where a development comes forward as Build to Rent, the [Planning Practice Guidance](#)²⁴ expects the affordable element will be private affordable rent and that the full scheme would be under common management. The PPG

²⁴ <https://www.gov.uk/guidance/build-to-rent#planning-for-build-to-rent>



sets out that the process for managing affordable private rent units should be set out in the Section 106 agreement and that this should set out the parameters of the letting's agreement, the rent levels, apportionment of the homes across the development, a management and service agreement, and a marketing agreement setting out how their availability is to be publicised. The Section 106 agreement is also to require build to rent scheme operators to produce an annual statement to authorities, confirming the approach to letting the affordable units, their ongoing

status, and clearly identifying how the scheme is meeting the overall affordable housing level required in the planning permission. The PPG also expects that the eligibility criteria would be agreed with the local authority and established through the Section 106.

- 4.29 Given that it is not anticipated that a significant number of Build to Rent schemes will be proposed, the Council will consider such proposals and the Section 106 agreements on a case by case basis, including eligibility criteria.

5. Financial Contributions



Key Local & National Policies

Suffolk Coastal Local Plan (2020) policies:

- SCLP5.10 Affordable Housing on Residential Developments

Waveney Local Plan (2019) policies:

- WLP8.2 Affordable Housing



5. Financial Contributions

- 5.1 Policies SCLP5.10 and WLP8.2, and paragraph 63 of the 2021 National Planning Policy Framework (NPPF), expect that affordable housing will be provided on site. The provision of affordable housing on site provides a degree of certainty over the provision of the affordable housing and also helps to support mixed and integrated communities.
- 5.2 However, the policies recognise that there may be exceptional circumstances where the affordable housing cannot feasibly be provided on site. This may include developments such as solely flatted development where it is demonstrated that it would be unfeasible for a Registered Provider to manage part of a block; circumstances where the Council is satisfied that the provision of affordable housing on site would not be viable; the amount of affordable housing that could be viably delivered on site would be too small in number for it to be practical to manage by a Registered Provider; or in circumstances where the Council considers that a contribution could enable delivery of a better affordable housing solution. It may be that altering the tenure could result in satisfactory provision on site and would present a better solution for the delivery of affordable housing than the provision of a financial sum.
- 5.3 A financial contribution will also be sought where the requirement of either Policy SCLP5.10 or Policy WLP8.2 would result in a fraction of an affordable house being provided. For example, under Policy SCLP5.10, which requires 1 in 3 dwellings to be affordable on sites of ten or more dwellings or of 0.5ha or more, a development of 11 dwellings would be required to provide 3.67 affordable dwellings. In this case a commuted sum equivalent to 0.67 of an

affordable dwelling would be sought, along with 3 affordable dwellings provided on site.

- 5.4 As set out in paragraph 1.11, the Broads Authority are the local planning authority for the part of East Suffolk in the Broads. Policy DM34 of the Broads Local Plan sets out that commuted sums are required on sites of 6-9 dwellings, to be provided in accordance with the standards and policies of the relevant District Council (in this case, the Waveney Local Plan). The guidance set out here may therefore be relevant in the Broads Authority area.

Calculating commuted sums

- 5.5 Commuted sums will be calculated based on the serviced open market plot values for the size of dwellings that would have been required on site. Serviced open market plot values are used to reflect that had provision been made on site the cost to a Registered Provider would have reflected the build costs. The Council annually updates the evidence of open market plot values and publishes these on the Council's website²⁵, and these values will be used in calculating commuted sums. In circumstances where a developer proposes alternative values, this will need to be justified by the developer to the satisfaction of the Council.

Spending commuted sums

- 5.6 Where a commuted sum is required, this will be secured through the Section 106 agreement and will be payable at the trigger point set out in the Section 106 agreement. To ensure that suitable options for spending commuted sums can be identified, commuted sums will usually be able to

²⁵ www.eastsuffolk.gov.uk/planning/developer-contributions/s106/



be spent across East Suffolk. This provides greater opportunities for pooling sums and being able to take advantage of opportunities which arise and minimises the risk of sums having to be refunded.

- 5.7 The Council is developing a policy to guide the spending of commuted sums. Through this the Council is proactively working to ensure that sums are spent in a timely manner. This includes providing Registered Providers, community led housing organisations and the housing development service at the Council with an opportunity to apply for the funding.

- 5.8 In exceptional circumstances where commuted sums are received in lieu of provision of First Homes, in accordance with the Planning Practice Guidance on First Homes a proportion will be spent on delivery of First Homes to the equivalent of 25% of the value of affordable housing required. Where a mix of contributions and on-site provision is secured, 25% of the overall value of affordable housing contributions should be applied to First Homes.

6. Exception Sites



Key Local & National Policies

Suffolk Coastal Local Plan (2020) policies:

- SCLP5.11 Affordable Housing on Exception Sites

Waveney Local Plan (2019) policies:

- WLP8.6 Affordable Housing in the Countryside

NPPF (2021) Paragraphs

- 72, 78



6. Exception Sites

- 6.1 An 'exception site' is one where planning permission for open market housing would not normally be granted. The Local Plans contain Settlement Boundaries within which housing development is supported in principle. The policies provide limited opportunities for development outside of Settlement Boundaries, an approach which lowers land values in these locations by removing the 'hope value' for market housing which has a higher value.
- 6.2 Paragraph 78 of the 2021 National Planning Policy Framework sets out that local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs.
- 6.3 Paragraph 72 of the NPPF also sets out that local authorities should support the development of entry-level exception sites suitable for first time buyers. The recently introduced Planning Practice Guidance on First Homes provides for the development of First Homes exception sites. The principle is similar to other exception sites, however the PPG / NPPF states that entry level and First Home exception sites should not come forward in 'designated rural areas' which includes Areas of Outstanding Natural Beauty and other locations defined as rural in Section 157 of the Housing Act 1985.
- 6.4 The Council's two Local Plans both contain policies that provide support in principle for the development of affordable housing on exception sites in certain locations:
- SCLP5.11 Affordable Housing on Exception Sites
 - WLP8.6 Affordable Housing in the Countryside

- 6.5 The policy approaches in the two Local Plans are largely similar and set out the circumstances under which an exception site will be permitted. Exception sites may be developed and managed by community organisations (such as community led housing groups), Housing Associations or the Council.

Local need

- 6.6 The policies in both Local Plans require that there is an identified local need that cannot be met through existing housing allocations in the Local Plan or relevant Neighbourhood Plan. Policy SCLP5.11 also requires it to be demonstrated that the need cannot be met through development within the Settlement Boundary.
- 6.7 Chapter 8 provides guidance on undertaking local housing needs assessments, and this should inform the identification of need for exception sites. It is expected that the proposed development will be informed through a bottom-up approach of identifying a local need and seeking ways in which this need can be met. Speculative development, not supported by evidence of local need, will not be supported on exception sites. Local need is usually taken to be need identified within a parish boundary. There may also be occasions where an assessment of need is undertaken across more than one parish – in such circumstances it should be demonstrated how the location of the proposed development is appropriate for meeting the needs of a wider area. For example, an exception site at a large village could address needs from surrounding smaller villages.
- 6.8 The policies require applicants to consider whether the need could be met on allocated sites (or in the Settlement Boundary in the case of SCLP5.11). A link should be made with the findings of the housing needs assessment to determine whether these other options could meet the need identified. For



example, if an allocated site is not anticipated to come forward for a number of years it may not help in meeting any immediate needs identified. Opportunities in the Settlement Boundary should also be considered as part of the process of identifying a potentially suitable site for affordable housing, however it must be acknowledged that there may be few genuine opportunities for affordable housing led development as such sites may in principle come forward for market housing.

- 6.9 Need is expected to also be identified to inform proposals for entry level exception sites, in accordance with paragraph 72 of the NPPF which refers to considering whether the need is already being met within the local authority's area. For First Home exception sites, guidance set out in the Planning Practice Guidance on First Homes²⁶, and the Ministerial Statement²⁷ accompanying the PPG also suggests that needs and how they are being met should be considered at the local authority level. However, the Ministerial Statement sets out that local connection criteria may be set where this is supported by evidence of necessity and will not compromise site viability.
- 6.10 The identified need and the area it is intended to serve should help to inform the scale of the proposed development. However, a local needs assessment can over-estimate the actual needs as they may pick up an element of aspirational need and some needs identified may be met in other ways. It is therefore important that assessments are carried out by specialist independent and experienced consultants using a robust methodology.

²⁶ www.gov.uk/guidance/first-homes

Location

- 6.11 Policy SCLP5.11 requires that the scheme is adjacent or well related to an identified Settlement Boundary or a cluster of houses in the countryside. Policy WLP8.6 requires that the scheme is adjacent to Corton, a Larger Village, a Smaller Village or other rural settlements within the Countryside.
- 6.12 A 'cluster' is defined in Policy SCLP5.4 Housing in Clusters in the Countryside. The policies allow for exception sites to be developed adjacent (or well related in the case of SCLP5.11) to clusters (Suffolk Coastal) and other rural settlements in the countryside (Waveney) in acknowledgement that although these locations may not have the level of services and facilities to have a Settlement Boundary, they do in many cases function as a community and needs for affordable housing may otherwise not be able to be met. Clusters and other rural settlements in the Countryside are not listed in the Local Plans and it will need to be demonstrated why the location is considered to fall within this category and is a suitable location to support development of affordable housing, with reference to the identified local needs. Where the proposal is seeking to meet the needs identified across a number of settlements, it is expected that consideration is given to settlement size and level of service provision in identifying a suitable site (i.e. a larger settlement may be a more sustainable location than a smaller settlement).
- 6.13 Policy SCLP5.11 allows for exception sites in locations 'well related to' as well as adjacent to Settlement Boundaries and clusters. 'Well related' is not defined in the policy but it is expected that future occupants would identify with the host settlement and that suitable pedestrian/cycling access exists or can be provided to access services and facilities i.e., on an appropriately

²⁷ <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>



surfaced route and of a distance where most users could be expected to walk or cycle.

- 6.14 Not all settlements and clusters, particularly the smaller ones, will be suitable locations for an affordable housing exception site.

Housing mix

- 6.15 Policies SCLP5.11 and WLP8.2 require that the scheme incorporates a range of dwelling sizes, types and tenures appropriate to the identified local need. SCLP5.11 also requires that this includes the needs for affordable housing for older people.
- 6.16 The housing mix provided should be informed by the assessment of local needs, and it will be expected that any local housing needs survey will seek to identify the needs for specific tenures.
- 6.17 Affordable housing tenures will be expected to comply with the definitions set out in the NPPF (along with First Homes which is a new tenure established through the introduction of Planning Practice Guidance). Housing that does not fall within the definition of affordable housing will not be supported, unless proposed as part of a market housing element for viability reasons (see below).

²⁸ Suffolk Coastal Landscape Character Assessment (2018)
<https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/SCDC-Landscape-Character-Assessment.pdf>
 Settlement Sensitivity Analysis Volume 1: Landscape Fringes of Ipswich (2018)
<https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Settlement-Sensitivity-Assessment-Volume-1-July-2018.pdf>
 Settlement Sensitivity Analysis Volume 2: Suffolk Coastal (2018)

Character and setting of the settlement

- 6.18 Policies SCLP5.11 and WLP8.2 require that the location, scale and design standard of a scheme will retain or enhance the character and setting of the settlement. Policy SCLP5.11 also requires that it will not lead to settlement coalescence.
- 6.19 By their very nature, exception sites have a greater potential to impact on the character of the landscape due to their location on the edge of or well related to existing settlements.
- 6.20 As stated above, it is expected that the scale of a scheme will be informed by an assessment of local need for affordable housing, but it should also be informed by the location and the size and characteristics of the host settlement.
- 6.21 Consideration should be given to the Landscape Character Assessments and Settlement Sensitivity Assessments which form part of the evidence base of the Local Plans²⁸. Where Neighbourhood Plans exist, there may be further local landscape evidence and/or policies that will be relevant to consider.
- 6.22 It is expected that the design and layout will reflect the landscape character and the character of the built environment which it adjoins. Existing important landscape features such as trees and hedgerows should be retained where possible.

[https://eastsuffolk.inconsult.uk/gf2.ti/f/1006178/53423077.1/PDF/-/D22 Settlement Sensitivity Assessment Volume 2 Suffolk Coastal July 2018 reduced.pdf](https://eastsuffolk.inconsult.uk/gf2.ti/f/1006178/53423077.1/PDF/-/D22%20Settlement%20Sensitivity%20Assessment%20Volume%20Suffolk%20Coastal%20July%202018%20reduced.pdf)
 Landscape Character Assessment (2008) (Waveney)
<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf>
 Settlement Fringe Sensitivity Study (2016) (Waveney)
<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Settlement-Fringe-Landscape-Sensitivity-Study.pdf>



Market housing

- 6.23 Policies SCLP5.11 and WLP8.2 both provide scope for an element of market housing to be provided on site where this is necessary to cross-subsidise the affordable housing. The amount proposed would need to be demonstrated to be necessary through a viability assessment. Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan set out the requirements for undertaking viability assessment, and it is expected that this will be followed when proposing an exception site which includes an element of market housing. Whilst both policies provide for up to one third of the total dwellings to be market housing, this should be viewed as a maximum. The Council will not support any greater number of market homes than is necessary to facilitate the delivery of affordable housing. Chapter 7 provides guidance on tenure blind design, and this will apply to exception sites with an element of market housing.

Bringing forward an exception site

- 6.24 The Council's Housing Enabling Strategy sets out its commitment to supporting communities and partners in meeting local housing need. The strategy acknowledges that this may be through the identification of rural exception sites with local communities or community led housing groups, parish councils and registered providers.
- 6.25 The Council offers support to Community Led Housing groups, such as Community Land Trusts, Cohousing or Cooperative Housing Societies, in bringing forward suitable rural exception sites to meet identified local needs for affordable housing. Where community groups wish to bring

forward a development, the support offered will include early input from the planning service. Table 6.1 overleaf sets out the process that the Council would expect a community group to go through, in terms of activities that are relevant to the consideration of a planning application. The principal point of contact, other than for formal pre-application and planning application stages, is expected to be the Council's Housing Enabling Team who will co-ordinate input from other Council officers. The Council publishes its pre-application fees on its [website](#)²⁹ and may offer pre-application advice free for some affordable housing proposals (as per any details set out in the fee schedule at the time of seeking advice). Table 6.1 is directed primarily towards community led schemes and it is acknowledged that other groups such as Registered Providers may follow an approach suited to their organisation. However, early engagement with the Housing Enabling Team should take place.

Occupancy of affordable housing on exception sites

- 6.26 Affordable housing delivered as an exception site will initially be allocated to people who have a strong local and/or work connection. For rural exception sites the local connections cascade set out in the model Heads of Terms in Appendix 2 provides the basis for local connection criteria, and the cascade is expected to reflect the needs the development is seeking to meet. The model Heads of Terms set out that the local connections cascade should require a minimum period of 3 months advertising to the initial cascade. On rural exception sites, the affordable housing must be retained as such in perpetuity.

²⁹ www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/



Table 6.1: Bringing forward an Exception Site – Recommended Process

Stage	Activities	Role of the Council
Identifying a local need for affordable housing	See the guidance in Chapter 8 of this SPD. Community engagement is crucial.	Housing Enabling Team able to provide guidance. Input will be sought from the Planning Policy and Delivery team and Development Management team on the process / content of proposed methods for identifying local needs, in terms of likely compliance with policies and the guidance in the SPD.
Identifying sites	An appropriate area of search should be established in which to identify potential sites. Consideration to also be given to the scale of site being sought and the type of housing it is expected to accommodate based on the housing needs survey. The Strategic Housing and Economic Land Availability Assessments, which form part of the evidence bases for the Local Plans, may provide a useful starting point along with local promotion of the search for suitable sites.	Housing Enabling Team to co-ordinate advice on potential sites from Planning Policy and Delivery team and Development Management team. This may include site visits. This should be sought at an early stage in order to inform site selection.
Proposed site – pre-application advice	It is recommended that pre-application advice be sought from Planning on the site proposed. This will enable advice to be given in relation to any outstanding concerns from the site selection process, detailed matters and the submission of appropriate information.	Development Management to provide pre-application advice in line with the provisions of the pre-application advice service ³⁰ .
Planning Application	Preparation and submission of a planning application for the proposed development site. If there has been significant pre-	Planning application to be submitted to and considered by Development

³⁰ <https://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/>



	application engagement, as set out above, a detailed planning application rather than outline may be the most suitable route. The detailed process is explained on the Council's website ³¹ .	Management. The planning application may be determined by Planning Committee. The Housing Enabling Team is a consultee on planning applications.
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³¹ <https://www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/planning-application-process/>

7. Design

Key Local & National Policies

Suffolk Coastal Local Plan (2020) policies:

- Policy SCLP5.8: Housing Mix
- SCLP11.1 Design Quality
- SCLP11.2 Residential Amenity

Waveney Local Plan (2019) policies:

- WLP8.29 Design
- WLP8.31 Lifetime Design
- WLP8.32 Housing Density and Design

NPPF (2021) Chapters

- 8, 12



7. Design

Design: a strategic priority

7.1 The design quality of the district's housing stock and the neighbourhoods within which they sit is important for achieving the respective visions and strategic priorities of the two Local Plans. The Local Plans' respective design policies are intended to help deliver the ambitions of the strategic priorities which seek to achieve well-designed built environments. The relevant strategic priorities of the two Plans therefore form the fundamental objectives of the Local Plans' key design policies, acting as 'golden threads' running through them. The strategic priorities relevant to the design of residential developments are broadly the same across both Plans, and can be summarised as:

- To support healthy, safe, cohesive, and active communities through improving health, wellbeing and education opportunities for all.
- To enhance and protect the natural, built and historic environment and provide accessible green infrastructure and public open spaces.
- Enhance the vitality and viability of town centres and villages.
- Promote high quality design and significantly improve the quality of urban design across the Local Plan areas; and
- Mitigate human impact on the environment and reduce contributions to climate change and conserve natural resources.

7.2 The design policies set out the overall level of design quality that the Council would expect when assessing planning proposals for housing and housing-led developments.

7.3 Between them, the Local Plans aim to deliver over 20,000 dwellings throughout the plan period to 2036. It is anticipated that a significant amount of these dwellings will be affordable homes, and it is equally important that these homes are well-designed in terms of their overall material quality, appearance, size, usability for the needs of their resident households, and their relationship with the overall site, its community infrastructure (green and blue infrastructure, any communal facilities, shops and services within the development, etc.), and the wider environment.

What is good design?

7.4 'Good' design in the built environment can mean different things to different people, particularly from an aesthetic perspective. However, usability for its intended purpose by its intended users, and the designing-in of resilience for meeting future needs, challenges and change are universal fundamental principles of sustainable, good design.

7.5 A good design approach therefore starts with how spaces and buildings are intended to feel and function for the people that live, work and play in them to optimise their experience (health and wellbeing) and productivity (ability to carry out intended functions). Design decisions shape places, spaces and lived experiences at all scales of development – from the decision to increase a dwelling's internal space to accommodate a dining area large enough to seat the whole family, right up to the creation of a network of high-quality cycling and walking routes for a new community that facilitates safe cycling to work, school, and to important local services.



- 7.6 The design of places and spaces therefore has a significant impact on the lifestyles, health, wellbeing and overall quality of life available to everyone that lives in, works in and regularly visits them. It is well understood that the quality of a person's housing and the neighbourhood within which it sits are important determinants of their physical and mental health. From the immediate day-to-day impacts on their body and mind such as the ability to access a healthy diet, physical activity, their level of car dependency, pollution exposure, social interaction/isolation, etc, to their overall ability to live a socially, environmentally, and economically sustainable, and active lifestyle. Everyone benefits from raising the general levels of population health and community interactivity within and across neighbourhoods – and good design supports this by default.
- 7.7 Good design is an art, and therefore there is no 'one size fits all' definition of how it will look and function on every site, at all scales and in all settings.
- 7.8 The Local Plans' design policies, along with other guidance such as that contained in Development Brief SPDs, set out the Council's expectations for proposals to achieve high standards of design. Paragraph 134 of the 2021 National Planning Policy Framework (NPPF) states:

"Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes;

and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."

- 7.9 This chapter of the SPD therefore provides guidance on the key design policies that determine what the Council would support as an appropriate and high-quality approach to the design of mixed-tenure or exclusively affordable housing residential development.





- 7.10 This chapter's key message is that the Council expects the same high quality of design regardless of tenure type and expects the affordable tenure element of a mixed-tenure scheme to be indistinguishable from the market tenure element.
- 7.11 The Council also expects site layouts and community facilities and amenities (i.e. shared at site-level, such as communal parking areas, green/blue infrastructure, children's play areas, trim trails/outdoor gyms, bin storage areas, etc.) to be designed for fair and equal access for all tenures included on site. Together this approach is referred to throughout this document as **'tenure-blind design'**.
- 7.12 The key design policies are listed at the start of this chapter, however, both of the Local Plans feature other more 'general' policies that inform how residential development should be designed (some varying according to the scale of the development), and therefore should also be given regard to. These more general design policies relate to designing for sustainable transport, sustainable construction, parking standards, open space provision and retaining landscape character – all of which must apply equally regardless of tenure. Site allocation policies will often also include site-specific design criteria. Where relevant to residential design, the Council expects the criteria to be met in accordance with the tenure-blind design principles outlined in this chapter.

³²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf

Tenure-blind design: policy context

- 7.13 The NPPF calls for planners and decision-makers to ensure that, amongst other considerations, development produces healthy, inclusive and safe places, stating the importance of creating:

"...places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience" (paragraph 130 (f)).

- 7.14 Like the Local Plans, the NPPF should be read as a whole. However, the Chapters most relevant to residential design for healthy communities are:

- 8 Promoting healthy and safe communities
- 9 Promoting sustainable transport
- 12 Achieving well-designed places

The [National Design Guide](#)³² directly supports tenure-blind, or here referred to as 'tenure neutral', design under paragraph 116, which states that mixed-tenure developments can be considered well-designed when *"...they are well-integrated and designed to the same high quality to create tenure neutral homes and spaces, where no tenure is disadvantaged"*.

- 7.15 Tenure-blind design is also referred to directly in the First Homes Planning Practice Guidance (PPG), paragraph 6, which reads *"First Homes should be*



physically indistinguishable from the equivalent market homes in terms of quality and size”.

- 7.16 Tenure-blind design is directly required in Local Plan policy through the following three key design policies:

- Policy SCLP11.1 Design Quality
- Policy WLP8.2 Affordable Housing
- Policy WLP8.29 Design

- 7.17 Policy WLP8.2 Affordable Housing, amongst other policy criteria, states that in the Waveney Local Plan area:

“...affordable housing should be indistinguishable from market housing in terms of the location, external appearance, design, standards and build quality and should meet all requirements of the design policies”

- 7.18 Policy SCLP11.1 Design Quality requires tenure-blind design by referring the reader to the Building for a Healthy Life guidelines (formerly Building for Life 12), which in turn advises that, in order to earn a ‘green’ (positive) score, the development should constitute:

“...homes and streets where it is difficult to determine the tenure of properties through architectural, landscape or other differences”; “apartment buildings might separate tenure by core but each core must look exactly the same” (p.35).

- 7.19 The policy context clearly sets out how ‘tenure-blind design’ can be understood and applied. Therefore, any level of distinction or inferior

specification used in the shell or plot design, or disadvantage caused by the overall site design or layout should be avoided.

- 7.20 The main design policies of both Local Plans (Policy SCLP11.1 Design Quality and Policy WLP8.29 Design) each make direct reference to the Building for Life 12 design guide, which was intended to be used by developers of major residential development proposals to inform good design approaches, and to help give structure to design discussions between local communities, local planning authorities, developers and other stakeholders. It also facilitated the post-delivery assessment of developments against the twelve design criteria questions, with developments that scored positively made eligible to receive (and to market that they had received) the ‘Built for Life’ quality commendation.

- 7.21 However, this has since been updated and superseded by [‘Building for a Healthy Life: A Design Toolkit for neighbourhoods, streets, homes and public spaces’](#) (2020)³³ guidance. This document is applied by the Council for informing the assessment of design quality in major residential proposals and for recommendations at the pre-application advice stage in accordance with paragraph 133 of the NPPF. As this document has replaced Building for Life 12, references in the design policies to Building for Life 12 are to be taken to be references to Building for a Healthy Life.

- 7.22 The Building for a Healthy Life guidelines similarly score identified indicators of design quality, though with an updated emphasis on the facilitation of a healthy life as the overall objective of good design. As with Building for Life 12, if the development scores a sufficiently high overall score it can be

³³ <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>



awarded a Building for a Healthy Life (BHL) Commendation, which can be used as a quality mark to market to prospective buyers and occupiers.

- 7.23 Other Supplementary Planning Documents that the Council has prepared may also provide guidance, where relevant to the design of affordable housing. These include Development Brief Supplementary Planning Documents (being prepared for some sites allocated in the Local Plans), the Historic Environment Supplementary Planning Document (2021), the Sustainable Construction Supplementary Planning Document (2022) and the Healthy Environments Supplementary Planning Document (under preparation).
- 7.24 Many Neighbourhood Plans also have policies relating to design which would apply to proposals involving affordable housing.
- 7.25 The forthcoming Suffolk Design Guide and the Suffolk Design for Streets Guide are relevant for the consideration of design matters at street, site, and neighbourhood scale. The Council is also preparing an East Suffolk Cycling and Walking Strategy, which identifies important strategic and local level improvements to facilitate the further uptake of cycling and walking as a form of sustainable transport for commuting, essential and leisure trips, and to improve the safety, comfort, and enjoyment of these trips.
- 7.26 A number of other local and national documents are relevant when considering the design of residential development, such as the National Design Guide³⁴. There are also other civil society guidelines and certification schemes which support the delivery of good design principles, such as The

³⁴ [National design guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-design-guide)

³⁵ <https://www.qolf.org/>

[Quality of Life Framework](#)³⁵ (2021) and the [Building with Nature Standards](#)³⁶.



Tenure-blind design: key design principles

- 7.27 The Council expects tenure-blind design in all design aspects of the elevations and plot, and in access to the property.
- 7.28 Tenure-blind design does not mean that all units on a site need to look the same. Together with a suitably size-varied housing mix, the Council encourages designers to consider their site's potential to take on a variety of different elevation and plot morphologies – styles, materials, shapes, heights and densities – and to create distinctive character areas within sites that relate well to each other and the overall form and layout of their

³⁶ www.buildingwithnature.org.uk



surroundings. The key is for equivalent size dwellings of different tenure types within a design typology present on site to look the same.

Tenure-blind design: shell and plot considerations

- 7.29 Tenure-blind design principles applied at 'shell' (i.e. the building itself) and plot level is critical to achieving socially sustainable development. However, tenure-blind design should not be limited to the appearance or size of units' shells or plots – there are other physical elements that can also indicate tenure type.

To successfully achieve tenure-blind design at both the shell and plot level, the Council would expect to see:

- Comparable overall sizing of dwellings. For dwellings intended for affordable rent tenure, the internal sizing of bedrooms and the dwelling's layout should maximise the number of people that can be housed (e.g. an affordable rent two bedroom dwelling can house four people; an affordable rent three bedroom home can house five or six people, and so on), to provide flexibility on family size occupying the property. If affordable dwellings are proposed to be smaller than equivalent market dwellings the applicant will be expected to demonstrate why this is appropriate. Floorspace measurements on a plot by plot and tenure by tenure basis are expected to be submitted with a planning application; reference to the Nationally Described Space Standards in the design and submission of plans is encouraged.
- Consistent application of decorative elements of the design and materials - such as finials, brickwork or boundary treatments – rather than it being limited to 'core' design elements such as window types used;

- Consistent sizing and treatment of residential garden space and landscaping;
- Where on-plot parking (i.e. off-street) is provided, affordable dwellings' parking provision has regard to the Suffolk Guidance for Parking (as per Policies SCLP7.2 and WLP8.21);
- Apartment blocks that are mixed-tenure, rather than single-tenure, are preferred where this can be accommodated, though it is understood that some Registered Providers are less willing to take on mixed-tenure apartment blocks;
- Where provided, mixed-tenure apartment blocks should have a shared entrance and core (shared internal areas such as stairwells), rather than separate entrances and cores according to tenure-type. Individual front doors at street level can also provide both visual and social benefits. Where a shared entrance and/or shared core have not been possible, the entrances and cores are expected to look the same as the other tenure's entrance and core. The design approach to separate entrances should not be limited to just the doors of the entrance, but should include equalising other entrance elements used such as (as applicable) the use of shelter, lighting, surfacing materials, and any landscaping/planting used around it or along the path approaching the entrance.

Internal space

- 7.30 Another general design consideration for residential development is the impact of internal size, layout, fittings, storage and the extent of designed-in space flexibility for future occupants; these considerations are particularly relevant to future occupants that will be renting their home, as they may have been limited in their initial choice of rental property



and then are limited in their ability to change, customise or extend the property's internal space post-occupation.

- 7.31 Available internal space, the quality of the space for its intended function(s), and how flexible the space is for different uses can have a big impact on health, wellbeing and relationships within households. For example, a very small kitchen will make preparing family meals from scratch difficult. Similarly, a lack of internal living space can mean that a family are unable to eat together at a table, so instead eat separately, and may choose to eat sat in front of a television ('distracted eating' has been linked to higher caloric intake). Regarding employment and education opportunities, not having a dining or other suitable study area may rule out working from home for the household's adult(s), and smaller bedroom sizes that exclude the fitting of a study desk may mean the household's children have nowhere suitable and quiet to complete their homework. In terms of sustainable lifestyles, poor design may also mean, particularly if teamed with a lack of external space provision, that the household have nowhere to store bicycles, precluding them from participating in regular cycling despite its benefits for the health of people and planet. The internal size and layout of proposed residential units will therefore be assessed in terms of whether they are reasonable and conducive to a home that supports good health and quality of life. The internal size, layout and specification (i.e. fixtures and fittings) are recommended to be discussed at an early stage with Registered Providers that may be interested in purchasing the dwellings.

- 7.32 Increased internal space doesn't just mean a separate playroom, more storage or a better kitchen, it can also increase the property's accessibility. People with reduced mobility are particularly vulnerable to low-quality design. Accessibility for people using a wheelchair or walking aid is increased when internal dimensions allow for turning circles, use of appliances (e.g. accessing the oven) and transitions throughout the rooms and floors (where applicable) of the dwelling. The Local Plan policies SCLP5.8 and WLP8.31 require a stated proportion (50% & 40% respectively) of dwellings to be built in accordance with Part M4(2) 'accessible and adaptable dwellings standards' of the Building Regulations, which include minimum internal dimensions to future-proof homes and allow safe movement, (and the designing-in of space flexibility for necessary subsequent adaptations) for occupants should they need adaptations to the dwelling for wheelchair accessibility in the future (for example, in multiple storey properties, internal space made available for the later fitting of a lift).





- 7.33 Private external space was also evidenced to have been a huge asset for people's health and wellbeing during the Covid-19 pandemic - even if it was just having their own private balcony. Where the provision of even a minimal appropriate amount of external private space is not possible, the provision or improvement of high quality public green space and semi-private community green spaces (such as allotment sites or community gardens) may go a long way towards improving the quality of life for those without private external space access.

Tenure-blind design: site-level

- 7.34 Tenure-blind design also requires regard to off-plot, site-level design elements that may otherwise indicate the property's tenure. Consideration should therefore be given to the inclusivity of the layout and function of the site as a whole, avoiding imbalances that may unreasonably impact the experience of living there for affordable housing occupiers (such as placing all of the affordable housing along the site's main vehicular access route). Consideration should also be given to how the site integrates into and enhances the inclusivity and functionality of the existing surrounding built environment, and wider settlement and landscape in which it is located or is adjacent to.

To achieve tenure-blind design at site level, the Council would expect to see:

- Well integrated and fairly distributed morphologies and densities present on the site across the different tenure types – key questions: has one tenure been exclusively represented, or relatively over-represented in any one morphology present on site? Has a different materials palette been used exclusively for a single tenure type? Has a disproportionate number of higher-density units been proposed as affordable dwellings?

- Proportionate clustering of affordable housing – non-contiguous clusters of up to 10 affordable dwellings are generally considered an appropriate maximum to support the creation of diverse and inclusive communities.
- A layout which means that exposure to potential environmental stressors (such as noise/vibration from roads or railway lines, air and light pollution reduced privacy from overlooking, etc.) will not disproportionately impact affordable housing occupants (more generally, it would be expected that the potential impacts of the identified stressor would be adequately mitigated for all users of the site). Similarly, the Council would expect affordable housing to be distributed throughout the site in a way that meant affordable housing occupants were not in any way disadvantaged in their access to residential amenities (children's play areas, green space, communal parking areas, etc.);
- Where communal parking areas are provided instead of on-plot parking spaces, the affordable dwellings have parking provision access consistent with the current revision of the Suffolk Guidance for Parking. An overall approach to movement throughout the site is expected to be consistent with policies SCLP7.1 Sustainable Transport, SCLP7.2 Parking Proposals and Standards, and WLP8.21 Sustainable Transport, regardless of tenure;
- Where other communal site facilities such as bin storage areas, visitor cycle parking, electric vehicle charging points etc. are provided, affordable homes are expected to be located within reasonable and convenient reach of them;



- Consistent access to on-site green infrastructure and sustainable transport infrastructure (including walking and cycling), across market and affordable tenures;
- Consistent quality, nature, size and proximity of open spaces and children's play spaces across tenures;

Housing mix: sizes and types

- 7.35 Together with achieving the appropriate tenure split, new housing development is expected to deliver a mix of housing sizes (number of bedrooms) and in some cases, types, such as housing built to M4(2) 'accessible and adaptable dwellings' standard, or M4(3) 'wheelchair user dwellings' standard, as per Part M of the Building Regulations (where required by the Council).
- 7.36 Residential development proposals for specialist accommodation will also be supported by the Council, in accordance with identified housing need in the Strategic Housing Market Assessment or latest equivalent assessment of the housing area (see Chapters 3 and 8). Affordable specialist accommodation schemes (including those falling under C2 use class) may come forward as part of a wider scheme of either (market) specialist or a mix of specialist and non-specialist accommodation, or could potentially come forward solely for affordable specialist housing. Where part of a mix, as far as is practicable tenure-blind design principles should apply to specialist accommodation, although it is acknowledged that regardless of tenure specialist accommodation may for functional reasons need to look different to non-specialist accommodation.
- 7.37 The Housing Mix policies of both Local Plans encourage a focus on developing smaller dwellings, which are stated as being one and two bedroom dwellings. Though this is intended to help to meet the needs of

older people (who typically form one or two person households, and typically wish to downsize from larger family homes), smaller units can also meet the needs of other households such as sharers (small House in Multiple Occupation properties) and households without dependent children.

Housing mix: achieving appropriate density across tenure types

- 7.38 A key consideration regarding density and affordable housing, is to ensure that, where multiple levels of density co-exist on a site, a tenure type present on site is not easily identified by being exclusively at one density (for example, all of the highest-density apartment blocks on the site are exclusively affordable) or significantly concentrated at one density (i.e. most of the apartment blocks). It should be ensured that not only are a mix of sizes (number of bedrooms) well distributed across different tenures, but also different densities, where multiple density levels occur on a site.

Designing for accessibility, adaptability and dementia friendly design across all tenures

- 7.39 Accessibility can be considered under two main categories - within the home and out in the public realm. Within the home, Parts M4(2) and M4(3) of the Building Regulations set out standards for achieving accessible and adaptable dwellings and wheelchair user dwellings, respectively.
- 7.40 The Local Plans include a requirement for at least 50% (SCLP5.8) / 40% (WLP8.31) of all dwellings to be built to Building Regulation M4(2) 'accessible and adaptable dwellings' standards on sites of 10 or more dwellings. Under Suffolk Coastal Local Plan policy SCLP5.8 all specialist dwellings must meet M4(2) standards. Chapter 3 'Identifying an appropriate



mix of affordable housing' provides further guidance on achieving Part M4(2) 'accessible and adaptable dwellings' and Part M4(3) 'wheelchair user dwellings' compliance.

- 7.41 Fundamentally, building to M4(2) standard makes the transitional areas (hallways, stairs, doorways, the area around the bed in bedrooms, around kitchen units and appliances in kitchen areas, and spaces within bathrooms) larger, and the approach route, car parking/drop-off area, private entrance or communal entrance and lifts (where applicable) more suitable for those with reduced mobility. M4(2) standard homes also facilitate adaptation of the home to become suitable for wheelchair users should they need this level of accessibility in the future. M4(3) standard homes are designed to meet the needs of current wheelchair users.
- 7.42 It is expected that the tenure split of dwellings to be delivered to M4(2) standards between market and affordable, and between home ownership and rental homes, will reflect the context that disabled people are more likely to rent affordable housing and are less likely to own their own home than non-disabled people³⁷. It is therefore expected that a higher proportion of the M4(2) homes required to be delivered on site will be allocated to affordable housing, focusing in particular on affordable rental tenures. As with the mix of sizes (number of bedrooms) and types (houses, flats, etc.) required on site, engagement with the Council's Housing and Enabling team on the priorities for M4(2) dwellings on sites are as per current housing need is highly encouraged. Regardless of tenure type, all specialist dwellings in the Suffolk Coastal Local Plan area as per Policy

³⁷According to Office for National Statistics data on disability and housing (released 10 February 2022), nearly 1 in 4 (24.9%) disabled people aged 16 to 64 years in the UK rented social housing compared with fewer than 1 in 10 (7.9%) non-disabled people; they were also less likely to own their own home (39.7%) and less likely to live with parents (16.4%) than non-disabled people

SCLP5.8 will be expected to meet the requirements for the M4(2) 'accessible and adaptable dwellings' standards.

- 7.43 Both Local Plans recognise that the population of the district is ageing, and the district's need for affordable housing is not limited to younger or working-age people. Policy SCLP5.10 therefore specifically states that affordable housing delivered on residential sites should meet local needs including those of older people.
- 7.44 In terms of accessibility in the public realm, the policies of the Local Plans (principally SCLP11.1 Design Quality and WLP8.31 Lifetime Design) expect that new development will adopt the principles of dementia-friendly design, and these principles apply equally to the public realm around and accessibility to affordable housing as they do to market housing. Proposals should create permeable and legible developments which are easily accessed and used by all, regardless of age, mobility and disability, across all tenures. All proposals should demonstrate that the design supports the needs of older people and those with dementia through the adoption of dementia-friendly design principles. All housing developments of ten or more dwellings in the Suffolk Coastal area are also expected to demonstrate how they will contribute to meeting the needs of older people, regardless of tenure type.

(53.3% and 19.2% respectively) (year ending June 2021). Dataset available at: <https://www.ons.gov.uk/releases/outcomesfordisabledpeopleintheuk2021>.



Designing according to developable area and appropriate density

- 7.45 All residential development at the scale thresholds set in Policy SCLP5.10: Affordable Housing on Residential Developments (development with capacity for 10 units or more, or sites of 0.5ha or more) and Policy WLP8.2 Affordable Housing (sites with a capacity of 11 dwellings or more) are expected to develop the site at an appropriate density (for the location and to meet the needs of the intended occupants) and to make the most efficient and effective use of the site. Inefficient use of land to deliver development below the threshold for affordable housing will therefore not be supported.
- 7.46 Paragraph 5.66 in the Suffolk Coastal Local Plan states that in determining whether a site has capacity for more than ten units, consideration will be given to the potential developable area of a site and an appropriate density for development that accords with Policy SCLP11.1 Design Quality.
- 7.47 Policy WLP8.32 Housing Density and Design states that development should make the best use of a site in a manner that protects or enhances the distinctiveness and character of the area and takes into account the physical environment of the site and its surroundings. Development proposals in and adjacent to the built-up area of Lowestoft and the market towns should aim for urban scale development at a density of at least 30 dwellings per hectare, unless local character indicates otherwise. Some of the site-specific policies within the Waveney Local Plan specify a dwellings per hectare figure within the policy wording.
- 7.48 Where an applicant expects the delivery of a development to come forward in phases, it is expected that the intentions for the future phases of the site

will be clearly set out. Land parcels should not be divided to avoid triggering the requirement for affordable housing.

Layout: distribution of affordable homes

- 7.49 Affordable housing is usually delivered in clusters, which is understood to be important for operational and management reasons. However, this needs to be balanced with the ambition to create inclusive and socially sustainable developments that help to build communities by supporting increased social interaction across different groups. A cluster of affordable housing in this context is considered by the Council to be a group of up to ten affordable dwellings with no 'gaps' created by green/open space, land in other uses, or market tenure homes in between, and is not contiguous with another cluster.
- 7.50 Clustering is covered in the Building for a Healthy Life guidelines, which both Local Plans' respective main design policies make reference to. The Building for a Healthy Life guidance describes "affordable homes that are distributed across a development" ('pepper-potting') as positive, and "grouping affordable homes in one place (except on smaller developments)" as negative.
- 7.51 'Pepper-potting', be it the scattering of individual dwellings or of clusters of up to ten dwellings, is considered to be the best approach to affordable housing distribution for supporting health, well-being and social cohesion, and meeting the needs of Registered Providers. This approach helps to ensure affordable tenures are not over-represented in any one area of the site (except on small sites), and that clusters are not contiguous with each other.



Sustainable construction

- 7.52 Affordable housing units are expected to be built to the same levels of sustainable construction and energy efficiency through sustainable construction methods as market value units; all elements of both Local Plans' sustainable construction policies (Policy SCLP9.2 and Policy 8.28) apply regardless of tenure type.
- 7.53 Designing for year-round solar gain and solar shading helps to ensure that homes are warmer in the winter and cooler in the summer, and if teamed with high-quality insulation materials and installation methods, will retain a more constant temperature, therefore lessening the need for central heating use, thus lowering the household bills of future occupants. Whilst this is important for housing of all tenure types, this is a particularly pertinent consideration for affordable housing units as it has the potential to significantly reduce energy costs for those most in need of reduced household bills.



- 7.54 The cost and energy efficiency of affordable homes may also benefit from modern methods of construction to produce sections of the building's shell

off-site under factory conditions that can then be assembled on site, at a lower cost and level of embodied carbon than a traditional build. This may also have the added benefit of making it easier to achieve higher levels of air tightness and energy and sound insulation than traditional on-site construction, providing multiple operational benefits to Registered Providers and future occupants of the homes.

- 7.55 More information on sustainable construction methods that are encouraged by the Council to meet the energy efficiency policy criteria set is available in the Council's Sustainable Construction Supplementary Planning Document.

Exception sites: affordable housing in the Countryside

- 7.56 Chapter 6 sets out more detailed guidance on the principle of and evidence behind bringing forward affordable housing on exception sites.
- 7.57 Regarding the design of exception sites, the Local Plans both have Settlement Hierarchy policies that differentiate between settlements that are considered to be able to support further residential growth in principle, and those that cannot. The categorisation process was undertaken in accordance with the level of services, facilities and infrastructure that the settlements had been identified as having at the time the two Local Plans were being prepared; this meant that not all recognisable settlements were given policy-defined Settlement Boundaries. The Local Plans define all land outside of defined Settlement Boundaries as the 'Countryside', which has the effect of substantially reducing the scope for housing development to be considered acceptable in planning terms in these areas. One of the potential exceptions to this is for affordable housing schemes which may be able to be delivered in the

Countryside under limited circumstances. The limited circumstances are set out in the respective policies (Policy SCLP5.11 Affordable Housing on Exception Sites and Policy WLP8.6 Affordable Housing in the Countryside) and the NPPF.



- 7.58 Policies SCLP5.11 and WLP8.6 expect that exception sites will retain or enhance the character and setting of the settlement. Because these sites would be located in the Countryside (i.e. outside of Settlement Boundaries), the design of such development will need to be appropriate and sensitive to the Countryside location and have a design relationship with the character of the built form of the adjacent settlement or housing cluster.
- 7.59 The design should therefore be appropriate to the character of existing buildings in the adjacent settlement through the use of appropriate materials, heights, proportions, density and detailing. The respective Landscape Character Assessments³⁸ that have been produced to

³⁸ Available at <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/local-plan-evidence-base/>

accompany the two Local Plans will be useful reference sources in considering the impact on the setting of the settlement. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) [Guidance on the Selection and Use of Colour](https://www.suffolkcoastandheaths.org/managing/planning/guidance-for-planning-in-the-aonb/)³⁹ document should also help to inform the design of affordable housing for sites within the AONB.

- 7.60 The scale of an exception site should also be appropriate to its location. Exception sites should be of a scale that is both reflective of the local housing need and appropriate to the character and scale of the settlement. The exception site should represent planned incremental growth and not dominate the existing settlement. Exception sites should also not lead to coalescence or the perception of coalescence between two settlements.
- 7.61 On mixed-tenure schemes where a minor element of market housing has been included to cross-subsidise the affordable homes being delivered, the market element should be subordinate in scale to the amount of affordable housing. For the avoidance of doubt, where mixed-tenure sites are considered appropriate on exception sites, the Council expects the development to be tenure-blind in design and appearance.
- 7.62 Policy SCLP5.11 Affordable Housing on Exception Sites also provides opportunities for the delivery of affordable specialist accommodation on sites outside of but adjacent or well related to Settlement Boundaries.
- 7.63 Neighbourhood Plans, where they are in place, may contain design policies that would be relevant to the design of an exception site.

³⁹ <https://www.suffolkcoastandheaths.org/managing/planning/guidance-for-planning-in-the-aonb/>

8. Local Housing Needs Assessments





8. Local Housing Needs Assessments

- 8.1 Policies SCLP5.11 and WLP8.2 of the Local Plans are centred upon supporting affordable housing proposals as exceptions to usual planning policy for housing, where this is to meet a local need for affordable housing. Crucially the starting point must therefore be understanding what the local need for affordable housing is, as this will inform the location, scale and tenure of affordable housing. The Council will expect to see that a robust assessment of local need has been undertaken in accordance with the principles and guidance set out below.
- 8.2 Local housing need assessments may also be relevant to other developments of affordable housing, or for example to Neighbourhood Plan groups in preparing policies on affordable housing, and therefore the guidance in this section of the SPD is not limited to exception sites. Where affordable housing is required as part of a residential development it is not necessary for this to be evidenced by a local housing need assessment where a proposal is policy compliant, however where one exists it may help to inform the tenure and mix of affordable housing provision.

Data and information sources

- 8.3 It is first necessary to define the area where the need for affordable housing is being assessed. In most cases this is likely to be the parish, however, this may extend to a group of parishes for example where a single parish is too small or a group of parishes have a close functional relationship.
- 8.4 An assessment of local housing need should be based on the collection of primary data. One method for undertaking this would be through the distribution of surveys to households within the defined area,

however, regardless of the exact method, meaningful engagement with the community is critical. Surveys should address the following:

- They should seek to identify *needs* (as opposed to views or preferences) for the amount and also different tenures and sizes of affordable housing arising from households within the area, taking account of household incomes and the ability to afford market housing or affordable, low cost home ownership tenures.
 - Needs for specialist forms of affordable accommodation, such as sheltered or extra care units, and the needs of older people should also be assessed. This is particularly important in the Suffolk Coastal Local Plan area where the policies expect that the needs of older people are provided for.
 - The potential for affordable needs to be met by self or custom-build housing should also form part of the survey where a self or custom build affordable housing development is being considered.
 - The assessment should also seek to identify the timescales over which such needs are likely to arise. Specialist independent and experienced consultants should be engaged to carry out housing needs assessments.
- 8.5 The Council's Housing Register (Gateway to Homechoice) is a choice-based lettings system whereby applicants bid to show their interest in a particular property. Data extracted from Gateway to Homechoice will show the number of applicants who have a local connection to a particular parish. However, this may not show the true number of applicants who wish to live in the parish as applicants may seek to live elsewhere in the district or not feel it worth their while in applying.



- 8.6 The data should be up to date at the point at which a planning application is submitted. Up to date is considered to be data which has been gathered in the last 5 years. The older the data, the more likely that circumstances will have changed which could lead to issues further down the line for example in eligible occupants coming forward.

Applying the results

- 8.7 The need identified should be used to inform, rather than dictate, a proposed development. It isn't necessary to bring forward a development that equates precisely to the need identified – it may be that the precise needs change over time or are met in other ways. The data should provide a robust indication of the scale of need, but consideration will also need to be given to other factors such as landscape impact and availability of sites. In terms of mix, the data should provide an indication of the proportion of different tenures and sizes that are likely to help to meet the needs identified.

9. Viability Assessments



Key Local & National Policies

Suffolk Coastal Local Plan (2020) policies:

- SCLP5.10 Affordable Housing on Residential Developments

Waveney Local Plan (2019) policies:

- WLP8.2 Affordable Housing

NPPF (2021) Paragraphs

- 58



9. Viability Assessments

- 9.1 The Council's Local Plans have both been subject to Whole Plan Viability Studies as part of their production, and the policies in the Local Plans can therefore be considered to be viable to deliver. In accordance with paragraph 58 of the 2021 National Planning Policy Framework (NPPF), if an applicant considers that a proposed development is not viable whilst meeting the policy requirements for affordable housing it will be up to the applicant to demonstrate that this is the case to the satisfaction of the Council.
- 9.2 In accordance with the policies, the Council will only accept a reduction in affordable housing provision in exceptional circumstances and where demonstrated by a viability assessment. Under Policy WLP8.2, permission will only be granted for reduced affordable housing provision on sites which are necessary to the overall supply of housing in the district unless the scheme has wider sustainability benefits. This essentially means that sites which are not allocated for development or do not make up part of the five year supply of housing will not be supported unless they can provide a policy compliant amount of affordable housing, regardless of viability issues, unless there are overriding sustainability benefits that the Council consider would justify supporting.
- 9.3 In the Suffolk Coastal Local Plan area, reflecting the outputs of the Whole Plan Viability Study, Policy SCLP5.10 does not require any affordable housing provision on sites which are solely brownfield flattened development. Whilst solely flattened developments will be an appropriate

approach on some brownfield sites, the Council will expect that consideration is given to planning an appropriate mix of housing, based on the context of the site and the Council's policies on housing mix and design, and that the starting point is not the avoidance of affordable housing provision.

- 9.4 Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan set out the requirements for undertaking viability assessments. The Council's [Local Validation List](#)⁴⁰ also sets out what the Council expects to be submitted where applicants are submitting a viability assessment.
- 9.5 Where an applicant puts forward a case to vary the amount of affordable housing provision, the Council will expect that consideration is initially given to varying the tenure and/or reducing the number of affordable units, rather than the provision of zero affordable units, and that maximum affordable value possible is achieved.

⁴⁰ www.eastsuffolk.gov.uk/assets/Planning/Planning-Applications/Local-Validation-Requirements.pdf

10. Vacant Buildings Credit

Key Local & National Policies

NPPF (2021) Paragraphs



10. Vacant Buildings Credit

- 10.1 Paragraph 64 of the 2021 National Planning Policy Framework (NPPF) states that to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. Footnote 30 of the 2021 NPPF explains that this is equivalent to the gross floorspace of the existing buildings and that it does not apply to vacant buildings that have been abandoned.
- 10.2 The vacant buildings credit policy is a material consideration which must be considered in the determination of planning applications. Vacant building credit will only be applied where the building has not been abandoned and has not been demolished prior to the date when an application has been validated.
- 10.3 The Planning Practice Guidance on Planning Obligations provides guidance on the Vacant Buildings Credit. The PPG does not however provide a definition of “vacant building” so the Council will apply the Community Infrastructure Levy definition, which is a building that has not been in continuous use for any 6 month period during the last 3 years. The whole building must have been vacant, not just a single planning unit or part of the building. The building must be vacant at the time the application is validated.
- 10.4 The purpose of the Vacant Building Credit is to incentivise the development of brownfield land. It will therefore not apply in situations where there is a valid live consent on the site, where consent has recently lapsed, or where a site has had an application considered since the introduction of the guidance in the Planning Practice Guidance and the vacant buildings credit was not sought.
- 10.5 The PPG on Planning Obligations explains that the courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:
- the condition of the property
 - the period of non-use
 - whether there is an intervening use; and
 - any evidence regarding the owner’s intention
- 10.6 The national guidance does not specify how to calculate floorspace. For consistency Gross Internal Area (GIA) will be used for both vacant and proposed floorspace. An example calculation is included in Appendix 3.
- 10.7 The NPPF definition of exception sites are those of small scale where the principle of market housing wouldn’t ordinarily be accepted and the policies in the local plans (SCLP5.11 and WLP8.6) provide for such sites to come forward to meet locally identified needs for affordable housing that otherwise would not be met. Therefore, the vacant buildings credit should not be applied in circumstances where this would result in no affordable housing being provided on an exception site. Where the cost of redeveloping a vacant site to be used as an exception site would make the delivery of solely affordable housing unviable, Policies SCLP5.11 and WLP8.6 provide for some market housing to form part of the mix to cross-subsidise the affordable housing provision.
- 10.8 Applicants who consider that their proposals are eligible for vacant buildings credit should set out their evidence in a Vacant Buildings Credit Statement as part of their planning application. The information that should be contained in the statement is set out at Appendix 3.



10.9 If development viability remains an issue following application of the vacant buildings credit (see Chapter 9) then a viability appraisal would need to be submitted if a further reduction in the provision of affordable housing is sought. It should reflect the impact of vacant buildings credit and would need to demonstrate why the net affordable housing requirement cannot be met.

Community Infrastructure Levy

10.10 Existing 'in-use buildings' act as a credit on the 'chargeable development' Community Infrastructure Levy charge. Each square metre of existing building on the site, reduces the CIL by one square metre. The CIL Regulations define the credit as applying to 'in-use buildings' and buildings meet this definition if they are:

- I. present on the day that planning permission first permits the development; and
- II. contain a part that has been in lawful use for a continuous period of at least six months within the period of three years ending before the planning permission first permits the chargeable development.

10.11 The day planning permission first permits the chargeable development is the day the last reserved matter is approved (unless the applicant and the local planning authority agree to defer until pre commencement conditions are discharged). Applicants should not seek to claim 'in use' buildings for CIL

credit, while at the same time proposing they are vacant for the benefit of vacant buildings credit.

11. Community Infrastructure Levy





11. Community Infrastructure Levy

- 11.1 The Community Infrastructure Levy (CIL) is a charge on certain specified developments to help to deliver the infrastructure needed to support development. The former Suffolk Coastal District Council and the former Waveney District Council both adopted Community Infrastructure Levy Charging Schedules and the Council therefore collects Community Infrastructure Levy for certain developments. The Council is currently reviewing the CIL Charging Schedule with a view to adopting a new charging schedule for East Suffolk.
- 11.2 Whilst the Council's CIL Charging Schedules include residential developments, the Community Infrastructure Levy Regulations allows for 100% relief for the development of social housing. Whilst this covers many types of affordable housing, the Community Infrastructure Levy Regulations allow Councils to set a policy allowing relief for other affordable tenures. The former Suffolk Coastal District Council and former Waveney District Council both adopted Discretionary Social Housing Relief Policies and these, or any subsequent policies published by East Suffolk Council, should be referred to. The Discretionary Social Housing Relief Policies can be viewed on the Council's CIL webpages⁴¹ and guidance is set out in the Planning Practice Guidance on the Community Infrastructure Levy⁴²
- 11.3 In relation to the recently introduced First Homes, the Planning Practice Guidance explains that mandatory social housing relief will be available for

First Homes as this can apply in respect of dwellings where the first and subsequent sales are for no more than 70% of their market value.

- 11.4 To obtain the relief, an application must be made to the Council prior to commencement of the development. Further advice is available on the Council's CIL webpages⁴³.
- 11.5 Should an affordable dwelling cease to be an affordable dwelling, the social housing relief granted may need to be paid back, in accordance with the Community Infrastructure Levy Regulations.

⁴¹ <https://www.eastsuffolk.gov.uk/planning/developer-contributions/cil-and-s106-advice-service/>

⁴² <https://www.gov.uk/guidance/community-infrastructure-levy>

⁴³ <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>

12. Making a Planning Application



12. Making a Planning Application

- 12.1 Applications for planning permission that involve affordable housing should include sufficient relevant information for their determination. For a checklist of information that must be submitted with an application, applicants should consult the East Suffolk Council [Local Validation List](#)⁴⁴.
- 12.2 The Council provides a pre-application advice service, for a charge (other than in some cases – see Chapter 6 Exception Sites) and would expect and encourage applicants for developments involving affordable housing to use this service. Further details are available on the Council's website at www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/find-out-if-you-need-planning-permission/pre-application-advice-service/.
- 12.3 For outline applications, the Council expects the submission of an Affordable Housing Statement to set out the percentage and/or number of affordable dwellings (depending on whether the precise number of dwellings is known) including tenure, size, mix and details of floorspace at plot by plot (where possible) and tenure by tenure level. At reserved matters stage it is expected that affordable dwellings, including tenure, would be clearly identifiable at plot level. Details of the Registered Provider, if known, should also be provided.
- 12.4 For applications for full permission the Council expects the Affordable Housing Statement to include full details of the proposed affordable

housing, including tenure and size mix, clearly identifiable at plot level. Details of the Registered Provider, if known, should also be provided.

- 12.5 Design and Access Statements should be submitted for proposals involving housing development and should include an explanation of how the design of the development integrates the affordable housing. The Design and Access Statement could also be used to explain which affordable plots would meet the M4(2) accessible and adaptable dwellings standard.

⁴⁴ www.eastsuffolk.gov.uk/planning/planning-applications-and-enforcement/how-to-submit-a-planning-application/



Appendix 1 Affordable Housing Needs by Tenure

Suffolk Coastal Local Plan area:

Source <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/SHMA-Part-2-update-2019.pdf> (2014 based results)

Table 4.2f Current tenure and tenure profile projected in 2036 in Suffolk Coastal

Tenure	Current tenure (2018)		Projected tenure (2036)	
	Number	Percentage	Number	Percentage
Owner-occupied	41,131	73.0%	47,293	72.9%
Private rented	8,562	15.2%	9,442	14.6%
Shared Ownership	132	0.2%	729	1.1%
Social Rent/Affordable Rent	6,542	11.6%	7,413	11.4%
Total	56,367	100.0%	64,877	100.0%

Table 4.3f Tenure of new accommodation required in Suffolk Coastal 2018 - 2036

Tenure	Current tenure profile	Tenure profile 2036	Change required	% of change required
Owner-occupied	41,131	47,293	6,163	72.4%
Private rent	8,562	9,442	880	10.3%
Shared Ownership	132	729	597	7.0%
Social Rent/Affordable Rented	6,542	7,413	871	10.2%
Total	56,367	64,877	8,510	100.0%

**Table 4.4f Size of new owner-occupied accommodation required in Suffolk Coastal 2018 – 2036**

<i>Size of home</i>	<i>Current size profile</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	1,107	1,670	563	9.1%
Two bedrooms	7,648	9,677	2,029	32.9%
Three bedrooms	17,096	18,700	1,604	26.0%
Four or more bedrooms	15,280	17,247	1,967	31.9%
Total	41,131	47,293	6,163	100.0%

Table 4.5f Size of new private rented accommodation required in Suffolk Coastal 2018 - 2036

<i>Size of home</i>	<i>Current size profile</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	1,430	1,576	146	16.6%
Two bedrooms	3,147	3,356	209	23.7%
Three bedrooms	2,922	3,195	273	31.0%
Four or more bedrooms	1,063	1,315	252	28.6%
Total	8,562	9,442	880	100.0%

**Table 4.6f Size of new Shared Ownership accommodation required in Suffolk Coastal 2018 - 2036**

<i>Size of home</i>	<i>Current size profile (2018)</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	24	184	160	26.7%
Two bedroom	45	219	174	29.1%
Three bedroom	47	208	161	27.1%
Four or more bedrooms	16	118	102	17.1%
Total	132	729	597	100.0%

Table 4.7f Size of new Social Rent/Affordable Rent required in Suffolk Coastal 2018 - 2036

<i>Size of home</i>	<i>Current size profile (2018)</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	1,778	1,948	170	19.5%
Two bedroom	2,466	2,564	98	11.3%
Three bedroom	2,159	2,276	117	13.4%
Four or more bedrooms	139	625	486	55.8%
Total	6,542	7,413	871	100.0%

**Table 4.8f Potential demand for discount home ownership/Starter Homes in Suffolk Coastal by size 2018 - 2036**

<i>Dwelling size</i>	<i>Discount home ownership/Starter Homes</i>	<i>Residual private rented homes</i>
One bedroom	66	80
Two bedroom	111	97
Three bedroom	143	130
Four or more bedrooms	70	182
Total	390	489

Waveney Local Plan area:

Source <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-2.pdf>

Table 4.2b Current tenure and tenure profile projected in 2036 in the Waveney HMA

<i>Tenure</i>	<i>Current tenure (2014)</i>		<i>Projected tenure (2036)</i>	
	<i>Number</i>	<i>Percentage</i>	<i>Number</i>	<i>Percentage</i>
Owner-occupied	35,554	69.2%	40,251	68.2%
Private rented	8,433	16.4%	9,598	16.3%
Shared Ownership	155	0.3%	633	1.1%
Social Rent/Affordable Rent	7,248	14.1%	8,563	14.5%
Total	51,390	100.0%	59,045	100.0%

**Table 4.3b Tenure of new accommodation required in the Waveney HMA 2014 - 2036**

<i>Tenure</i>	<i>Current tenure profile</i>	<i>Tenure profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupied	35,554	40,251	4,697	61.4%
Private rent	8,433	9,598	1,165	15.2%
Shared Ownership	155	633	478	6.2%
Social Rent/Affordable Rented	7,248	8,563	1,315	17.2%
Total	51,390	59,045	7,655	100.0%

Table 4.4b Size of new owner-occupied accommodation required in the Waveney HMA 2014 - 2036

<i>Size of home</i>	<i>Current size profile</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	704	1,188	483	10.3%
Two bedrooms	8,522	9,823	1,301	27.7%
Three bedrooms	17,833	19,466	1,633	34.8%
Four or more bedrooms	8,494	9,774	1,280	27.2%
Total	35,554	40,251	4,697	100.0%

**Table 4.5b Size of new private rented accommodation required in the Waveney HMA 2014 - 2036**

<i>Size of home</i>	<i>Current size profile</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	1,611	1,735	124	10.6%
Two bedrooms	2,965	3,322	357	30.7%
Three bedrooms	3,282	3,741	458	39.4%
Four or more bedrooms	575	800	226	19.3%
Total	8,433	9,598	1,165	100.0%

Table 4.6b Size of new Shared Ownership accommodation required in the Waveney HMA 2014 - 2036

<i>Size of home</i>	<i>Current size profile (2014)</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	30	133	103	21.6%
Two bedroom	48	204	156	32.6%
Three bedroom	51	213	162	34.0%
Four or more bedrooms	26	83	57	11.9%
Total	155	633	478	100.0%

**Table 4.7b Size of new Social Rent/Affordable Rent required in the Waveney HMA 2014 - 2036**

<i>Size of home</i>	<i>Current size profile (2014)</i>	<i>Size profile 2036</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	2,339	2,617	279	21.2%
Two bedroom	2,195	2,465	270	20.5%
Three bedroom	2,536	2,919	383	29.1%
Four or more bedrooms	178	562	383	29.2%
Total	7,248	8,563	1,315	100.0%

Table 4.8b Potential demand for discount home ownership/Starter Homes in the Waveney HMA by size 2014 - 2036

<i>Size of home</i>	<i>Discount home ownership / Starter Homes</i>	<i>Residual private rented homes</i>
One bedroom	78	47
Two bedroom	141	218
Three bedroom	174	286
Four or more bedrooms	60	166
Total	454	716



Appendix 2 Section 106 Model Heads of Terms and Template Clauses

Purpose

The purpose of this document is to set out the standard terms under which East Suffolk Council expects Section 106 Planning Obligations relating to the provision of Affordable Housing to be agreed. Deviation from the Model Heads of Terms and clauses will only be accepted where justified and in exceptional circumstances. The Model Heads of Terms have been prepared in consultation with stakeholders and interested parties and will be periodically reviewed and updated. The Model Heads of Terms should be read in conjunction with the guidance contained in the East Suffolk Affordable Housing Supplementary Planning Document.

Compliance with Planning Policy

The Council has two Local Plans, each with their own policy for the provision of Affordable Housing. The policy requirements are set out in the Suffolk Coastal Local Plan under Policy SCLP5.10 Affordable Housing on Residential Developments, and in the Waveney Local Plan under Policy WLP8.2 Affordable Housing. The Government introduced its policy on First Homes in 2021. The Affordable Housing Supplementary Planning Document explains how the Council will apply the Government's First Homes policy. The policy requirements, including the application of the First Homes policy, are summarised below:

	Threshold	Requirement	Tenure
Suffolk Coastal Local Plan (SCLP5.10)	10 dwellings or more and sites of 0.5ha or more	1 in 3 – applies to whole plan area	50% affordable rent / social rent 25% shared ownership 25% discounted home ownership (to be applied as 25% First Homes - see section on First Homes in Ch3 of SPD)
Waveney Local Plan (WLP8.2)	11 dwellings or more	20% in Lowestoft and Kessingland (excluding Corton); 40% in Southwold and Reydon; 30% elsewhere	50% affordable rent Expectation that the remainder is affordable ownership (25% to be secured as First Homes - see section on First Homes in Ch3 of SPD)

Neighbourhood Plans may also contain their own policies on affordable housing requirements and mix.

Planning Application Stage

Planning applications should be clear in terms of the number, housing types and tenure types of the Affordable Housing provision proposed on the development (percentages may be appropriate on Outline schemes). Applicants should seek to engage with the Council's Housing Enabling Team to ensure the proposed Affordable Housing reflects local housing requirements following analysis of the relevant housing needs information. Early engagement will reduce the need for lengthy discussions or potential design changes over the course of the application.



Preparation of a Section 106 Agreement

An agreement involving the requirement for on-site Affordable Housing should:

1. Define Affordable Housing.
2. Set out the mix of the Affordable Housing, by percentage on outline schemes (where final dwelling numbers are not known), and by number in detailed applications. Applicants should have engaged in discussions with the Council to determine Affordable Housing need at pre-application stage.
3. On outline schemes, set out an agreed mix of housing types, sizes and tenures by percentage, with the requirement for an Affordable Housing Scheme to be submitted with the reserved matters for approval. On phased schemes, details must be given of the proposed mix for the remaining phases to ensure well thought out provision across the development as a whole.
4. On detailed schemes, set out the plot number, housing type (including which of these are M4(2/3) compliant), size and tenure, subject to amendments agreed in writing with the Council.
5. Include the requirement for an Affordable Housing Scheme to be submitted with the following details (unless they are set out in detail in the Section 106 Agreement):
 - the timescale and programme for implementation of the Affordable Housing Scheme and construction of the Affordable Dwellings;
 - the name and registration number of the Registered Provider if known;
 - the number, location, tenure, plot numbers, housing type and size (including the number of occupants a dwelling can house) of Affordable Dwellings allocated to the Affordable Housing Scheme;
 - full details of the Affordable Housing mix if differing from that set out in the Affordable Housing Table (such proposal to reflect the Council's up to date strategic housing market assessment and specific local needs as determined and agreed by the Council);
 - such other information as the Council may reasonably require to enable approval of the Affordable Housing Scheme.
6. Where the affordable dwellings are to be transferred to a Registered Provider, require a contract has been entered, or evidence provided demonstrating that negotiations are in hand, with a Registered Provider of Affordable Housing (which may include Housing Associations, Local Housing Authorities and community led housing groups who are legally constituted as non-profit organisations) for the purchase of the affordable dwellings prior to occupation of 40% of the market dwellings on the development/phase.



7. Where the affordable dwellings are to be transferred to a Registered Provider, require the affordable housing freehold to be transferred to a Registered Provider prior to occupation of no more than 60% of the market housing on the development/phase. Where sufficient justification is provided it may be appropriate to stagger provision of the units; in these cases, at least 50% of the affordable housing units must be provided prior to 50% of market housing occupations and the remainder prior to 75%.
8. Define the types of affordable housing permitted on the development, as defined within Annex 2 to the National Planning Policy Framework (2021) (or any amending or subsequent national planning policy that may be published by the Government from time to time) and where appropriate should allow for any fundamental changes in amended legislation or guidance (such as the minimum/maximum percentage that may be purchased on shared ownership schemes).
9. Define those eligible to occupy the affordable dwellings.
10. Include the affordable housing provisions not to be binding upon protected persons (protected persons to be defined within the Agreement).
11. Unless otherwise agreed, include a local connections cascade ensuring local people are given priority in allocating the affordable dwellings. Mutual exchange is expected to be in accordance with the local connections cascade.
12. Include appropriate Mortgagee Protection Clauses in line with the National Housing Federation standard template and Model first Homes section 106 Agreement clauses published by DLUHC.
13. Include a requirement for the Owner to notify the Council within 28 days of the transfer or sale of the affordable dwellings of the plot number, street address, house type, size and tenure of each dwelling and date of transfer.
14. Include cascade provisions in the event a Registered Provider cannot be found despite reasonable endeavours, for the Owner to enter into negotiations with the Council to seek an agreed way forward that does not disadvantage or fetter the ability to continue construction or occupation of the development whilst maximising the provision of affordable housing.
15. Include provisions if after three calendar months of handover of the affordable dwellings to the Registered Provider there remains any affordable dwellings not leased or sold and the RP can provide evidence to the Council's satisfaction there are no prospective occupants, the RP shall be free to seek written agreement of the Council to convert those affordable dwellings to an alternative form of affordable housing as defined within Annex 2 to the National Planning Policy Framework (February 2021) (or any amending or subsequent national planning policy that may be published by the Government from time to time).
16. The Council will have nomination rights for any affordable rented dwellings and a nomination agreement must be entered into (unless the RP has entered into an agreement with the Council to grant nomination



rights across East Suffolk) prior to their occupation setting out the terms of allocation.

17. For discounted sale products, require a mechanism to ensure the discount is retained in perpetuity or set out the terms under which remaining equity may be purchased. 100% staircasing will not be allowed on First Homes or discounted market sale homes.

18. For shared ownership and shared equity housing that allows 100% staircasing, require the proceeds from the final sale to be held by the Registered Provider and reinvested in providing additional affordable housing in the East Suffolk district.

19. For First Homes, discounted sale and shared equity housing, require the owner to agree a procedure for verifying eligible purchasers prior to commencement. For First Homes this will be in the form prescribed by DLUHC.

20. For First Homes, discounted sale and shared equity housing, a mechanism for approving the market value of the unit and subsequent sale price.

21. For Rural Exceptions Sites, the affordable housing must be retained in perpetuity and the local connections cascade should be amended to require a minimum period of 3 months advertising to the initial cascade.

22. In the event a financial contribution is agreed in lieu of on-site affordable housing, or a contribution equal to a fraction of an affordable housing

unit is payable to make up the full policy requirement, the expectation is the contribution will be paid to the Council prior to occupation of more than 40% of the dwellings on the development, for provision of additional affordable housing within the District of East Suffolk. The contribution will be index linked to increases in the BCIS Index or any index that replaces it. The Council will have 10 years from full payment in which to spend the contribution.

Template Definitions (to be included/omitted as appropriate):

“Additional First Homes Contribution”

means in circumstances where a sale of a First Home other than as a First Home has taken place in accordance with paragraphs 1.10, 3.8 or 3.9 of this Schedule, the lower of the following two amounts:

- (a) 30% of the proceeds of sale; and
- (b) the proceeds of sale less the amount due and outstanding to any Mortgagee of the relevant First Home under relevant security documentation which for this purpose shall include all accrued principal monies, interest and reasonable costs and expenses that are payable by the First Homes Owner to the Mortgagee under the terms



	<p>of any mortgage but for the avoidance of doubt shall not include other costs or expenses incurred by the First Homes Owner in connection with the sale of the First Home</p> <p>and which for the avoidance of doubt shall in each case be paid following the deduction of any SDLT payable by the First Homes Owner as a result of the Disposal of the First Home other than as a First Home.</p>		
“Affordable Dwellings”	Means X Dwellings to be made available as Affordable Housing comprising of {number/tenures} Dwellings the exact number, location, tenure and mix of Affordable Dwellings as set out in the Affordable Housing Table;		
“Affordable Dwellings for Rent”	Affordable Housing let by a Registered Provider to Eligible Persons where the rent level is capped at 80% of the local market rent (including any service charges, where applicable) and within local housing allowance rates, or as otherwise agreed with the Council in writing;		
“Affordable Housing”	Housing that will be available to eligible households and as defined in Annex 2 of the National Planning Policy Framework	“Affordable Housing Contribution”	<p>(2021) or any amending or subsequent national planning policy that may be published by the Government whose needs are not met by the market and eligibility is determined with regard to local incomes and local house prices (unless otherwise agreed in writing with the Council);</p> <p>Means the sum of £ (pounds) Index Linked to be paid [in lieu of on site affordable housing / as a contribution of X of an Affordable Dwelling in lieu of on site affordable housing] to be used towards the provision of Affordable Housing through the acquisition of land or the construction or development of new properties or the purchase or refurbishment of existing market properties in East Suffolk;</p>
		“Affordable Housing Scheme”	<p>A scheme to be submitted [for each Phase intended to include Affordable Housing] for the provision of the Affordable Dwellings generally in accordance with the Affordable Housing Table unless otherwise agreed with the Council such Affordable Housing Scheme shall include details of;</p> <ul style="list-style-type: none">- the timescale and programme for implementation of the Affordable



	<p>Housing Scheme and construction of the Affordable Dwellings;</p> <ul style="list-style-type: none">- the name and registration number of the Registered Provider, where known;- a plan and schedule indicating the number, location, tenure, plot numbers, type and size (including number of occupants each dwelling can house) of Affordable Dwellings allocated to the Affordable Housing Scheme;- full details of the Affordable Housing mix if differing from that set out in the Affordable Housing Table (such proposal to reflect the Council's up to date strategic housing market assessment and specific local needs as determined and agreed by the Council);- such other information as the Council may reasonably require to enable approval of the Affordable Housing Scheme;		
"Affordable Housing Table"	Means the table at clause/schedule X indicating the house types and tenure types of the Affordable Dwellings unless otherwise agreed in writing with the Council;		
"Allocation Policy"	Means the policy and procedure adopted by the Council to determine the eligibility and priority for allocation of the Affordable Dwellings for Rent;		
		"Armed Services Member"	means a member of the Royal Navy the Royal Marines the British Army or the Royal Air Force or a former member who was a member within the five (5) years prior to the purchase of the First Home, a divorced or separated spouse or civil partner of a member or a spouse or civil partner of a deceased member or former member whose death was caused wholly or partly by their service;
		"BCIS Index"	the All In Tender Price Index published by the Building Cost Information Service of the Royal Institution of Chartered Surveyors or any successor organisation or (if that index shall cease to be published or is otherwise unavailable) such alternative basis of indexation as may be agreed between the Council and the Owners;
		"Chargee"	any mortgagee or chargee of the Registered Provider or the successors in title to such mortgagee or chargee or any receiver or manager (including an administrative receiver) appointed pursuant to the Law of Property Act 1925;
		"Compliance Certificate"	means the certificate issued by the Council confirming that a Dwelling is being Disposed of as a First Home to a purchaser meeting the Eligibility Criteria



	(National) and unless paragraph 3.2 applies the Eligibility Criteria (Local);
“Discount Market Price”	means a sum which is the Market Value of a First Home discounted by at least 30%;
“Discount Market Sale Dwellings”	Means Affordable Dwellings sold at a discount of at least 20% below Market Value to Qualifying Persons and subject to a binding covenant securing the discount in perpetuity;
“Disposal”	means a transfer of the freehold or (in the case of a flat only) the grant or assignment of a leasehold interest other than: (a) a letting or sub-letting of a First Home in accordance with paragraph 3 (b) a transfer of the freehold interest in a First Home or land on which a First Home is to be provided before that First Home is made available for Occupation except where the transfer is to a First Homes Owner (c) an Exempt Disposal and “Dispose” and “Disposed” and “Disposing” shall be construed accordingly;

⁴⁵ Planning Permission to be defined

“Dwelling”	means any dwelling (including a house bungalow flat or maisonette) to be constructed pursuant to the Planning Permission ⁴⁵ ;
“Eligibility Criteria (Local)”	means local criteria met in respect of a purchase of a First Home if: (a) the purchaser meets the criteria in the Local Connections Cascade (or in the case of a joint purchase at least one of the joint purchasers meets the Local Connections Cascade); and (b) the purchaser meets any further local criteria in effect at the date of the relevant Disposal of a First Home it being acknowledged that at the date of this Deed the Council has only prescribed Eligibility Criteria (Local) in respect of (a); means criteria which are met in respect of a purchase of a First Home if: (a) the purchaser is a First Time Buyer (or in the case of a joint purchase each joint purchaser is a First Time Buyer); and (b) the purchaser’s annual gross income (or in the case of a joint purchase, the joint purchasers’ joint annual gross
“Eligibility Criteria (National)”	



	income) does not exceed £80,000 or such other sum as may be published for this purpose from time to time by the Secretary of State and is in force at the time of the relevant Disposal of the First Home;		
“Eligible Person”	A person or persons on the housing register maintained by the Council or who is otherwise approved by the Council as being in need of separate or alternative accommodation and unable to buy housing generally available on the open market;		
“Exempt Disposal”	means the Disposal of a First Home in one of the following circumstances: (a) a Disposal to a spouse or civil partner upon the death of the First Homes Owner (b) a Disposal to a named beneficiary under the terms of a will or under the rules of intestacy following the death of the First Homes Owner (c) Disposal to a former spouse or former civil partner of a First Homes Owner in accordance with the terms of a court order, divorce settlement or other legal agreement or order upon divorce,	“First Home”	annulment or dissolution of the marriage or civil partnership or the making of a nullity, separation or presumption of death order (d) Disposal to a trustee in bankruptcy prior to sale of the relevant Dwelling (and for the avoidance of doubt paragraph 1.10 shall apply to such sale) Provided that in each case other than (d) the person to whom the Disposal is made complies with the terms of paragraph 3; means a Dwelling which may be Disposed of as a freehold or (in the case of flats only) as a leasehold property to a First Time Buyer at the Discount Market Price and which on its first Disposal does not exceed the Price Cap; means the person or persons having the freehold or leasehold interest (as applicable) in a First Home other than: (a) [the Developer; or] ⁴⁶ (b) a[nother] developer or other entity to which the freehold interest or leasehold interest in a First Home or in the land on which a First Home is to be provided has been transferred before

⁴⁶ If ‘Developer’ is defined in the Deed



	that First Home is made available and is Disposed of for Occupation as a First Home; or		
"First Time Buyer"	the freehold a tenant or sub-tenant of a permitted letting under paragraph 3; means a first time buyer as defined by paragraph 6 of Schedule 6ZA to the Finance Act 2003;	Local Connections Cascade	C is the BCIS Index for the month two (2) months before the date on which the sum is payable;
"Homes England"	The non-departmental public body responsible for creating thriving communities and affordable homes in England and which is the Regulator of Social Housing within the meaning of section 81 of the Housing and Regeneration Act 2008 or such other body that may replace it in either function;	"Market Dwellings"	D is the BCIS Index for the month two (2) months before the date of this Deed; and
"Index Linked"	the increase in any sum referred to in Schedule X by an amount equivalent to the increase in the BCIS Index from the date of this Deed until the date on which such sum is payable using the application of the formula $A = B \times (C/D)$ where: A is the sum payable under this Deed; B is the original sum calculated as the sum payable;	"Market Value"	C/D is equal to or greater than 1; The local connections criteria to be applied to each and every let or sale of an Affordable Dwelling as set out in Appendix X; that part of the Development which is general market housing for sale on the open market and which is not Affordable Housing; means the open market value as assessed by a Valuer of a Dwelling and assessed in accordance with the RICS Valuation Standards (January 2014 or any such replacement guidance issued by RICS) and for the avoidance of doubt shall not take into account any discount in the valuation;
		"Mortgagee"	means any financial institution or other entity regulated by the Prudential Regulation Authority and the Financial Conduct Authority to provide facilities to a person to enable that person to acquire an Affordable Dwelling including all such regulated entities which provide Shari'ah



“Nomination Agreement”	compliant finance for the purpose of acquiring an Affordable Dwelling; the agreement to be entered into by the Council and the Registered Provider in respect of rights for the Council to nominate Eligible Persons for the Affordable Dwellings for Rent in the form provided by the Council a draft of which is appended to this Deed at Schedule X;	“Protected Person”	Means any person who: a) has exercised the right to acquire pursuant to the Housing and Regeneration Act 2008 or any statutory provision for the time being in force (or any equivalent contractual right) in respect of a particular Affordable Dwelling; b) has exercised any statutory right to buy or preserved right to buy (or any equivalent contractual right) in respect of a particular Affordable Dwelling; c) a 100% Staircaser;
“Occupation” and “Occupied”	occupation for the purposes permitted by the Planning Permission but not including occupation by personnel engaged in construction, fitting out or decoration or occupation for marketing or display or occupation in relation to security operations;		d) any successor in title to a Chargee or Mortgagee of the persons named in a) – c) above; e) any Mortgagee of a Shared Ownership Dwelling lawfully exercising the mortgagee protection provisions within that Shared Ownership Lease;
“Practical Completion”	means the stage reached when the construction of a Dwelling is sufficiently complete that, where necessary, a certificate of practical completion can be issued and it can be Occupied;		Means a person or persons unable to buy housing generally available on the open market and whose household income is below £80,000 (or such other amount agreed in writing with the Council in accordance with government policy);
“Price Cap”	means the amount for which the First Home is sold after the application of the Discount Market Price which on its first Disposal shall not exceed Two Hundred and Fifty Thousand Pounds (£250,000) or such other amount as may be set locally or published from time to time by the Secretary of State;	“Qualifying Persons”	Offer prices from Registered Providers which give the Owners a reasonable consideration having regard to current
		“Reasonable Consideration”	



	market conditions in the Disposal of Affordable Housing of a similar type and location by Registered Providers on a grant free basis via Section 106 Agreements;		
“Registered Provider” or “RP”	For the purposes of this Deed means either: - - a body registered as a social landlord pursuant to the provisions of the Housing Act 1996 or a housing association within the meaning of the Housing Associations Act 1985 or; - any person or body or entity which is registered as a provider or social housing in accordance with Section 80(2) and Chapter 3 of the Housing and Regeneration Act 2008 or; - any body, organisation or company which is registered charity with the Charity Commissioners for England and Wales and approved by Homes England or any other body organisation or company approved by the Council and which has objects demonstrably similar to or compatible with or promoting those of a registered social landlord; to be approved in writing by the Council;	“SDLT”	in relation to the Shared Equity Dwellings and Discount Market Sale Dwellings;
		“Secretary of State”	means Stamp Duty Land Tax as defined by the Finance Act 2003 or any tax replacing it of like effect;
		“Shared Equity Dwellings”	means the Secretary of State for Levelling Up, Housing and Communities from time to time appointed and includes any successor in function;
“Sales Procedure”	Means the procedure to be approved in writing by the Council to verify the Market Value and eligibility of purchasers		Means Affordable Dwellings to be purchased at no more than 75% Market Value on a freehold basis with a second charge (“the Second Charge”) for the remaining 25% in favour of the RP. The Second Charge shall have no interest payable in relation to it and shall not involve any consideration being due on initial sale. The Second Charge shall not be redeemed or removed by the purchaser otherwise than on or after the second anniversary of the first Occupation of the Shared Equity Dwelling and only for consideration the equivalent of 25% of the Market Value at that time, or, if at any point during the Term the Shared Equity Dwelling is sold, then the proceeds of sale shall be divided on the basis of 75% of the proceeds to the vendor and 25% to the RP or Council and



	the Second Charge shall thereafter be redeemed and removed from the title on completion of the sale;
"Shared Ownership Dwellings"	Means those Dwellings purchased on a Shared Ownership Lease;
"Shared Ownership Lease"	Means a lease in a form approved by Homes England or where there is no such form in a form approved by the Council, such lease to provide for the following: <ul style="list-style-type: none">i. not more than 75% and not less than 10% of the equity (or such other percentages the Council may agree) shall be initially sold to the purchaser by the Registered Provider;ii. power to the purchaser to increase their ownership up to 100%;ii. an initial rent not exceeding 2.75% of the value of the equity retained by the Registered Provider subject to annual increases not exceeding Retail Price Index (All Items) published by the Office for National Statistics (or if such index ceases to be published such other index the Council shall reasonably determine) plus 0.5% or such other rent as complies with the requirements from time to time of Homes England;

⁴⁷ 'Plan' to be defined

"Site"	the land described in Schedule X against which this Deed may be enforced as shown edged red for identification purposes only on the Plan ⁴⁷ ;
"Valuer"	means a Member or Fellow of the Royal Institution of Chartered Surveyors being a Registered Valuer acting in an independent capacity;
"100% Staircaser"	Means a lessee of a Shared Ownership Dwelling or a under a Shared Ownership Lease who has exercised their right under that lease to purchase 100% of the equity in the Shared Ownership Dwelling or the owner of a Shared Equity Dwelling who has exercised their right to purchase the remaining equity;

Template Covenants (to be included/omitted as appropriate):

1. Affordable Housing Provisions relating to all Affordable Housing

- 1.1 The Owner covenants not to Commence Development until the Affordable Housing Scheme has been agreed in writing with the Council.
- 1.2 The Owner covenants that no more than 40% of the Dwellings shall be Occupied until the Affordable Housing Contribution has been paid to the Council.



- 1.3 The Owner covenants that no more than 40% of the Market Dwellings shall be Occupied (save unless otherwise agreed with the Council) until the Council has been notified of the name and registration number of the proposed Registered Provider for the Affordable Dwellings [(save for any Affordable Dwellings to be sold directly by the Owner)].
- 1.4 The Owner covenants that no more than 40% of the Market Dwellings shall be Occupied (save unless otherwise agreed with the Council) until a contract has been entered into with a Registered Provider for transfer of all the Affordable Dwellings [(save for any Affordable Dwellings to be sold directly by the Owner) unless otherwise agreed in writing with the Council.
- 1.5 The Owner covenants that no more than 60% of the Market Dwellings shall be Occupied until the Affordable Dwellings have been constructed in accordance with the Planning Permission made ready for residential Occupation and either transferred to a Registered Provider or marketed for sale to Qualifying Persons or First Time Buyers in accordance with the terms of this Deed.
- 1.6 The Owner covenants that from the date of Practical Completion the Affordable Dwellings shall not be used other than for the purposes of Affordable Housing for Eligible Persons or Qualifying Persons or First Time Buyers in accordance with the Affordable Housing Scheme subject however to the provisions herein.
- 1.7 In the event that a Registered Provider cannot be found for any of the Affordable Dwellings [(save for any Affordable Dwellings to be sold directly by the Owner subject to the Sales Procedure)] throughout England despite the Owner's reasonable endeavours to do so the Owner will be required to prove to the Council's satisfaction (the

Council at all times acting reasonably) that demand from Registered Providers has not been forthcoming for Reasonable Consideration.

- 1.7.1 If the Council is satisfied that demand from Registered Providers has not been forthcoming for Reasonable Consideration the Council will enter into written negotiations with the Owner to seek an agreed way forward that does not disadvantage the Owner whilst maximising the provision of Affordable Housing.
- 1.8 If after three calendar months of handover of the Affordable Dwellings to the RP there remains any Affordable Dwellings not leased or sold and the RP can provide evidence to the Council's satisfaction there are no prospective occupants the RP shall be free to seek written agreement of the Council to convert those Affordable Dwellings to an alternative form of Affordable Housing defined within Annex 2 to the National Planning Policy Framework (February 2021) (or any amended or subsequent national planning policy that may be published by the Government from time to time).
- 1.9 Nothing in this Schedule shall be binding on a Protected Person or any Mortgagee or Chargee of a Protected Person or any receiver appointed by such Mortgagee or Chargee or any person deriving title from any such person.

Mortgagee Protection Clauses

- 1.10 The Affordable Housing obligations in this Schedule X shall not apply to any Mortgagee or Chargee (or any receiver (including an administrative receiver appointed by such Mortgagee or Chargee) or any other person appointed under any security documentation to



enable such Mortgagee or Chargee to realise its security or any administrator (howsoever appointed) including a housing administrator (each a Receiver)) of the whole or any part of the Affordable Dwellings or any individual First Home or any persons or bodies deriving title through such Chargee, Mortgagee or Receiver PROVIDED THAT:

- 1.10.1 such Chargee or Receiver of an Affordable Dwelling for Rent or Shared Ownership Dwelling or Shared Equity Dwelling shall first give written notice to the Council of its intention to Dispose of the Affordable Dwellings and shall have used reasonable endeavours over a period of three months from the date of the written notice to complete a Disposal of the Affordable Dwelling[s] to another Registered Provider or to the Council for a consideration not less than the amount due and outstanding under the terms of the relevant security documentation including all accrued principal monies, interest and costs and expenses; and
- 1.10.2 if such Disposal of the Affordable Dwelling[s] for Rent or Shared Ownership Dwelling[s] or Shared Equity Dwelling[s] has not completed within the three month period, the Chargee or Receiver shall be entitled to Dispose of the Affordable Dwelling[s] for Rent or Shared Ownership Dwelling[s] or Shared Equity Dwelling[s] free from the Affordable Housing provisions in this Deed which provisions shall determine absolutely
- 1.10.3 such Mortgagee or Receiver of a First Home or Discount Market Sale Dwelling shall first give written notice to the Council of its intention to Dispose of the relevant Dwelling; and

- 1.10.4 once notice of intention to Dispose of the relevant First Home or Discount Market Sale Dwelling has been given by the Mortgagee or Receiver to the Council the Mortgagee or Receiver shall be free to sell that First Home subject only to paragraph 1.10.5 and that Discount Market Sale dwelling subject only to paragraph 1.10.6 at its full Market Value
- 1.10.5 following the Disposal of the relevant First Home the Mortgagee or Receiver shall following the deduction of the amount due and outstanding under the relevant security documentation including all accrued principal monies, interest and reasonable costs and expenses pay to the Council the Additional First Homes Contribution
- 1.10.6 following the Disposal of the relevant Discount Market Sale Dwelling the Mortgagee or Receiver shall pay to the Council an amount equal to 20% of the Disposal price or such lower amount where following the deduction of the amount due and outstanding under the relevant security documentation including all accrued principal monies, interest and reasonable costs and expenses less than 20% of the Disposal price remains
- 1.10.7 following receipt of notification of the Disposal of the relevant First Home or Discount Market Sale Dwelling the Council shall:
 - i. forthwith issue a completed application to the purchaser of that Dwelling to enable the removal of the restriction on the title set out in paragraph 3.5; and



- ii. apply all such monies received towards the provision of Affordable Housing in East Suffolk

Affordable Housing Table (Example)

House Type	Tenure	Number / percentage	Plot Number
1 bed 2 person flat	Affordable Rent	2	1-2
1 bed 2 person flat (M4(2/3) compliant	Affordable Rent	1	3
2 bed 4 person house	Affordable Rent	3	4-6
2 bed 4 person bungalow M4(2/3) compliant	Shared Ownership	3	12-14
3 bed 5 person house M4(2/3) compliant	First Homes	3	15-17

2. Rent and Shared Ownership Dwelling Provisions

2.1 The Registered Provider shall enter into a Nomination Agreement with the Council and shall not let Dispose or otherwise permit the Occupation of any of the Affordable Dwellings for Rent until such Nomination Agreement has been entered into.

2.2 On the first and any subsequent letting of an Affordable Dwelling for Rent the Council will (unless otherwise agreed in writing) nominate eligible applicants in accordance with the Allocation Policy and Nomination Agreement (Priority will go to applicants who have a Local Connection in accordance with the Local Connections Cascade at Appendix X).

2.3 The Registered Provider shall not Dispose of any interest in any of the Affordable Dwellings for Rent other than by way of an assured tenancy or an assured shorthold tenancy under the Housing Act 1988 (or any form of residential tenancy prescribed by statute in substitution for or in addition to those) PROVIDED THAT nothing in this paragraph shall be deemed to prohibit the sale of the Affordable Dwellings individually or together (in any numerical combination) as one transaction (whether or not subject to any tenancy) to a RP nor prevent any Registered Provider from charging the Affordable Dwellings in whole or part.

2.4 The Owner will notify the Council within 28 days of the transfer of any Affordable Dwellings to a Registered Provider of the plot number, street address, house type, size and tenure of each dwelling and date of transfer.

2.5 In the event 100% of a Shared Ownership Dwelling is purchased:

- i. the net proceeds from the final sale of the Shared Ownership Dwelling are to be ringfenced by the RP for 5 years for the provision of Affordable Housing within the East Suffolk District, and should the owner of the Shared Ownership Dwelling wish to sell it he must notify the RP and allow the RP to purchase the Shared Ownership Dwelling back in the first instance at Market Value;



- ii. in the event the RP purchases the Shared Ownership Dwelling in accordance with this clause at 2.5i, the Shared Ownership Dwelling will be marketed as such subject to the terms of this Deed; and
- iii. in the event the RP declines to purchase the Shared Ownership Dwelling or fails to notify the owner of the Shared Ownership Dwelling of its intention to make an offer to purchase the dwelling within twenty-eight days of the notification as specified in this clause at 2.5i, then the owner of the Shared Ownership Dwelling may sell it on the open market free from the terms of this Deed.

3. First Homes

- 3.1 The First Homes shall be marketed for sale and shall only be sold (whether on a first or any subsequent sale) as First Homes to a person or person(s) meeting:
- a. the Eligibility Criteria (National); and
 - b. the Eligibility Criteria (Local).
- 3.2 If after a First Home has been actively marketed for 3 months (such period to expire no earlier than three (3) months prior to Practical Completion) it has not been possible to find a willing purchaser who meets the Eligibility Criteria (Local), paragraph 3.1 b shall cease to apply.
- 3.3 Subject to paragraphs 3.6 to 3.10, no First Home shall be Disposed of (whether on a first or any subsequent sale) unless not less than 50% of the purchase price is funded by a first mortgage or other home purchase plan with a Mortgagee.
- 3.4 No First Home shall be Disposed of (whether on a first or any subsequent sale) unless and until the Council has been provided with evidence that:

- 3.4.1 the intended purchaser meets the Eligibility Criteria (National) and unless paragraph 3.2 applies meets the Eligibility Criteria (Local) (if any)
- 3.4.2 the Dwelling is being Disposed of as a First Home at the Discount Market Price and
- 3.4.3 the transfer of the First Home includes:
 - a) a definition of the "Council" which shall be East Suffolk Council
 - b) a definition of "First Homes Provisions" in the following terms:

"means the provisions set out in clause[s] [] of the [Supplemental] S106 Agreement a copy of which is attached hereto as the Annexure."
 - c) A definition of "[Supplemental] S106 Agreement" means the [supplemental] agreement made pursuant to Section 106 of the Town and Country Planning Act 1990 dated [] made between (1) the Council [and] (2) [and (3)]
 - d) a provision that the First Home is sold subject to and with the benefit of the First Homes Provisions and the Transferee acknowledges that it may not transfer or otherwise Dispose of the First Home or any part of it other than in accordance with the First Homes Provisions
 - e) a copy of the First Homes Provisions in an Annexure.
- 3.4.4 The Council has issued the Compliance Certificate and the Council hereby covenants that it shall issue the Compliance Certificate within twenty eight (28) days of being provided with evidence sufficient to satisfy it that



the requirements of paragraphs 3.3 and 3.4.1 have been met.

- 3.5 On the first Disposal of each and every First Home to apply to the Chief Land Registrar pursuant to Rule 91 of and Schedule 4 to the Land Registration Rules 2003 for the entry on the register of the title of that First Home of the following restriction:

"No disposition of the registered estate (other than a charge) by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a certificate signed by East Suffolk Council of East Suffolk House, Riduna Park, Station Road, Melton, Woodbridge IP12 1RT or their conveyancer that the provisions of clause XX (the First Homes provision) of the Transfer dated [Date] referred to in the Charges Register have been complied with or that they do not apply to the disposition"

- 3.6 The owner of a First Home may apply to the Council to Dispose of it other than as a First Home on the grounds that either:

- 3.6.1 the Dwelling has been actively marketed as a First Home for six (6) months in accordance with Clauses 3.1 and 3.2 (and in the case of a first Disposal the six (6) months shall be calculated from a date no earlier than six (6) months prior to Practical Completion) and all reasonable endeavours have been made to Dispose of the Dwelling as a First Home but it has not been possible to Dispose of that Dwelling as a First Home in accordance with paragraphs 3.3 and 3.4.1; or
- 3.6.2 requiring the First Homes Owner to undertake active marketing for the period specified in paragraph 3.6.1 before being able to Dispose of the Dwelling other

than as a First Home would be likely to cause the First Homes Owner undue hardship

- 3.7 Upon receipt of an application served in accordance with paragraph 3.6 the Council shall have the right (but shall not be required) to direct that the relevant Dwelling is Disposed of to it at the Discount Market Price.
- 3.8 If the Council is satisfied that either of the grounds in paragraph 3.6 above have been made out it shall confirm in writing within twenty eight (28) days of receipt of the written request made in accordance with paragraph 3.6 that the relevant Dwelling may be Disposed of:

- 3.8.1 to the Council at the Discount Market Price; or
- 3.8.2 (if the Council confirms that it does not wish to acquire the relevant Dwelling) other than as a First Home

and on the issue of that written confirmation the obligations in this Deed which apply to First Homes shall cease to bind and shall no longer affect that Dwelling apart from paragraph 3.10 which shall cease to apply on receipt of payment by the Council where the relevant Dwelling is Disposed of other than as a First Home.

- 3.9 If the Council does not wish to acquire the relevant Dwelling itself and is not satisfied that either of the grounds in paragraph 3.6 above have been made out then it shall within twenty eight (28) days of receipt of the written request made in accordance with paragraph 3.6 serve notice on the owner setting out the further steps it requires the owner to take to secure the Disposal of a Dwelling as a First Home and the timescale (which shall be no longer than six (6) months). If at the end of that period the owner has been unable to Dispose of the Dwelling as a First Home he may serve notice on the Council in accordance with paragraph 3.6 following which the Council must within 28 days issue



confirmation in writing that the Dwelling may be Disposed of other than as a First Home.

3.10 Where a Dwelling is Disposed of other than as a First Home or to the Council at the Discount Market Price in accordance with paragraphs 3.8 or 3.9 above the owner of the First Home shall pay to the Council forthwith upon receipt of the proceeds of sale the Additional First Homes Contribution.

3.11 Upon receipt of the Additional First Homes Contribution the Council shall:

3.11.1 within 28 working days of such receipt, provide a completed application to enable the removal of the restriction on the title set out in paragraph 3.5 where such restriction has previously been registered against the relevant title

3.11.2 apply all monies received towards the provision of Affordable Housing.

3.12 Any person who purchases a First Home free of the restrictions in schedule [] of this Deed pursuant to the provisions in paragraphs 3.9 and 3.10 shall not be liable to pay the Additional First Homes Contribution to the Council.

3.13 Each First Home shall be used only as the main residence of the First Homes Owner and shall not be let, sub-let or otherwise Disposed of other than in accordance with the terms of this Deed PROVIDED THAT letting or sub-letting shall be permitted in accordance with paragraphs 3.14 – 3.17 below.

3.14 A First Homes Owner may let or sub-let their First Home for a fixed term of no more than two (2) years, provided that the First Homes Owner notifies the Council in writing before the First Home is Occupied by the prospective tenant or sub-tenant. A First Homes Owner may let

or sub-let their First Home pursuant to this paragraph more than once during that First Homes Owner's period of ownership, but the aggregate of such lettings or sub-lettings during a First Homes Owner's period of ownership may not exceed two (2) years.

3.15 A First Homes Owner may let or sub-let their First Home for any period provided that the First Homes Owner notifies the Council and the Council consents in writing to the proposed letting or sub-letting. The Council covenants not to unreasonably withhold or delay giving such consent and not to withhold such consent in any of circumstances (a) – (f) below:

- a. the First Homes Owner is required to live in accommodation other than their First Home for the duration of the letting or sub-letting for the purposes of employment;
- b. the First Homes Owner is an active Armed Services Member and is to be deployed elsewhere for the duration of the letting or sub-letting;
- c. the First Homes Owner reasonably requires to live elsewhere for the duration of the letting or sub-letting in order to escape a risk of harm;
- d. the First Homes Owner reasonably requires to live elsewhere for the duration of the letting or sub-letting as a result of relationship breakdown;
- e. the First Homes Owner reasonably requires to live elsewhere for the duration of the letting or sub-letting as a result of redundancy; and
- f. the First Homes Owner reasonably requires to live elsewhere for the duration of the letting or sub-letting in order to provide care or assistance to any person.



- 3.16 A letting or sub-letting permitted pursuant to paragraph 3.14 or 3.15 must be by way of a written lease or sub-lease (as the case may be) of the whole of the First Home on terms which expressly prohibit any further sub-letting.
- 3.17 Nothing in this paragraph 3 prevents a First Homes Owner from renting a room within their First Home or from renting their First Home as temporary sleeping accommodation (except where other local policy restrictions apply) provided that the First Home remains at all times the First Home Owner's main residence.

4. Shared Equity and Discount Market Sale Housing

- 4.1 The maximum price payable to the Owners in respect of the Disposal of a Discount Market Sale Dwelling shall not exceed 80% of the Market Value (for sale or leasehold purposes) as certified by a Valuer.
- 4.2 The maximum price payable to the Owners in respect of the Disposal of a Shared Equity Dwelling shall not exceed 75% of the Market Value (for sale or leasehold purposes) as certified by a Valuer.
- 4.3 The Shared Equity Dwellings / Discount Market Sale Dwellings shall only be Disposed of (which term shall include a freehold sale or sale of a registrable lease) to a Qualifying Person in accordance with the Local Connections Cascade and on the terms specified herein PROVIDING THAT in the event they are transferred to a RP clauses 4.4 to 4.6 of this Paragraph 4 shall not apply:
- 4.4 The Owner covenants to agree the Sales Procedure with the Council no less than 8 weeks prior to marketing the Shared Equity Dwelling / Discount Market Sale Dwelling for its first sale.

4.5 Any dispute over the Market Value is to be determined by an independent expert⁴⁸ who is a chartered surveyor of not less than 10 years standing who is experienced in the field of valuing and selling residential property such as the Shared Equity Dwellings / Discount Market Sale Dwellings.

4.6 No purchaser of a Shared Equity Dwelling or Discount Market Sale Dwelling shall sub-let or otherwise rent out such Shared Equity Dwelling or Discount Market Sale Dwelling (unless approved in writing by the Council).

4.7 Where the freehold or a registrable leasehold interest in a Discount Market Sale Dwelling is transferred such transfer and all such subsequent transfers shall contain a covenant binding the transferee and all subsequent transferees that no transfer shall take place save for a Disposal of the freehold or registrable leasehold interest in the Discount Market Sale Dwelling at a price or premium which does not exceed 80% of the Market Value of the said unit at the date of Disposal as certified by a Valuer and will on each transfer of the said units apply for the following restriction (or a restriction in similar terms) to be entered in the Register of the title in the property:

"No transfer, assent or other dealing by the Proprietor of the property is to be registered without the transferee's solicitor producing to the Land Registry a Certificate confirming that the purchase price for the property does not exceed 80% of the open market value as determined in accordance with a Section 106 Agreement dated () and made under Section 106 Agreement given under the Town and County Planning Act 1990 between East Suffolk Council(1) and (2) and (3).

4.8 Nothing in the transfer shall operate to restrict delay limit or prevent the immediate Occupation or Disposal of any or Discount Market Sale Dwelling to or by a person and those living with him where such

⁴⁸ Capitalise if defined term



Occupation or Disposal arises as a result of a court order or any other statutory provision or presumption or will or intestacy but subject always to the strict compliance by any transferee of the legal estate with the provisions of this paragraph before any further Disposal for value of the legal estate takes place.

- 4.9 In the event the Owner is unable to find a suitable buyer for a Discount Market Sale Dwelling despite marketing the Dwelling for at least 6 months in total and all reasonable steps have been taken to sell the Dwelling (including, where appropriate, reducing the asking price) the Council may agree in writing to allow the sale of the dwelling on the open market and to remove the title restriction set out in paragraph 4.7 PROVIDING THAT

4.9.1 The Council has agreed in writing it is satisfied the Owner is unable to find a suitable buyer

4.9.2 A sum is paid to the Council equal to 20% of the purchase price of the Discount Market Sale Dwelling (or, as much as possible of that once the value of all lending against the Dwelling has been cleared) net of any additional Stamp Duty liability incurred towards the provision of Affordable Housing within the East Suffolk District.

- 4.10 In the event 100% of the Shared Equity Dwelling is purchased:
- the net proceeds from the sale of the Second Charge of the Shared Equity Dwelling are to be ring-fenced by the Registered Provider for 5 years for the provision of Affordable Housing within the East Suffolk District; and
 - the owner of the Shared Equity Dwelling may sell it on the open market free from the terms of this Deed.

⁴⁹ To be determined on a case by case basis as appropriate

Local Connections Cascade (to be appended)

1. Affordable Dwellings for Rent

- 1.1 The Affordable Dwellings for Rent are to be allocated to a person nominated by the Council in line with its Allocation Policy who is considered by them or it to be in need of such accommodation and unable to compete in the normal open market for property. Before nominating an applicant the Council will be satisfied that the applicant:
- Has continuously lived in [Parish] for the preceding 5 years, OR
 - Has continuously had a principal place of work in [Parish] for the preceding 5 years OR
 - Has parents or close family (i.e. mother, father, son or daughter) who are over 18 and who have lived in [Parish] for the preceding 5 years, OR
 - Due to a lack of suitable accommodation was forced within the preceding 5 years to move away from [Parish].
- 1.2 If there are no persons who qualify under paragraph 1.1 above the Affordable Dwelling shall be allocated to person nominated by the Council who:
- Has continuously lived within X⁴⁹ miles of the Site for the preceding 5 years, OR
 - Has continuously had a principal place of work within X miles of the Site for the preceding 5 years OR
 - Has parents or close family (i.e. mother, father, son or daughter) who are over 18 and who have lived within X miles of the Site for the preceding 5 years, OR
 - Due to a lack of suitable accommodation was forced within the preceding 5 years to move away from within X miles of the Site.
- 1.3 If there are no persons who qualify under paragraphs 1.1 and 1.2 above the Affordable Dwelling shall be re-advertised to the East Suffolk District



and where after re-advertising there are no persons who qualify under the paragraphs above the Affordable Dwelling shall be allocated to a person nominated by the Council who is considered by it to be in need of such accommodation and who is unable to compete in the normal open market for property in East Suffolk

1.4. Where there is a mutual exchange the Registered Provider may let the Affordable Dwelling to any incoming tenant who satisfies the local connection criteria at paragraphs 1.1 to 1.3 above

2. Affordable Dwellings for sale

2.1⁵⁰ On advertising the first Disposal of a Shared Ownership, First Home, Discount Market Sale or Shared Equity Dwelling the Dwelling shall be marketed for sale for the first 3 months to persons who:

- a. Have continuously lived within [Parish] for the preceding 5 years, OR
- b. Have continuously had a principal place of work within [Parish] for the preceding 5 years OR
- c. Have parents or close family (i.e. mother, father, son or daughter) who are over 18 and who have lived within [Parish] for the preceding 5 years, OR
- d. Due to a lack of suitable accommodation were forced within the preceding 5 years to move away from [Parish].

PROVIDING THAT if after 2 months of marketing no offer has been received from persons who comply with 2.1 a-d the dwelling may be sold to persons who comply with 2.2 a-d.

2.2 On advertising [subsequent⁵¹] Disposals of a Shared Ownership, First Home, Discount Market Sale or Shared Equity Dwelling the Dwelling shall be marketed for sale for the first 3 months to persons who:

- a. Have continuously lived within the East Suffolk District for the preceding 5 years, OR
- b. Have continuously had a principal place of work within the East Suffolk District for the preceding 5 years OR
- c. Have parents or close family (i.e. mother, father, son or daughter) who are over 18 and who have lived within the East Suffolk District for the preceding 5 years, OR
- d. Due to a lack of suitable accommodation were forced within the preceding 5 years to move away from the East Suffolk District.

2.3 If there are no purchasers who qualify under paragraphs 2.1 [and 2.2] above within 3 months of marketing the Affordable Dwelling it may be sold free of Local Connections restrictions.

⁵⁰ To be used where a Local Connection to the Parish (or group of Parishes) is required on initial sale of the dwelling, as considered appropriate depending on the circumstances of the development. This part of the cascade can be removed where only a connection to East Suffolk is required for all disposals.

⁵¹ 'subsequent' may be removed where a local connection to East Suffolk is required on ALL disposals, with no additional restrictions for the initial sale



Appendix 3 Vacant Buildings Credit

The following considerations will apply in determining whether Vacant Buildings Credit will be granted:

Is the site brownfield? The definition in the NPPF Glossary for previously developed land is “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. “

Is the building vacant? Applicants will need to show that the building is currently vacant and has not been in continuous use for any 6 month period within the preceding 3 years from the day the planning application is validated. Evidence such as Council Tax or Rates records will be required to determine whether or not a building is vacant.

Is the whole building vacant? If part of the building is occupied or has been occupied within the last 3 years then it will not qualify.

Has the building been made vacant for the sole purpose of redevelopment? Vacant buildings credit will not be applied to buildings that

have, so applicants will be expected to demonstrate that the vacancy has arisen for other reasons.

Has the building been abandoned? The onus will be on the applicant to demonstrate that a building is not an “abandoned building”. The applicant should have regard to the guidance contained in the Planning Practice Guidance which sets out the four relevant factors to consider:

- the condition of the property
- the period of non-use
- whether there is an intervening use; and
- any evidence regarding the owner’s intention

Is the proposal covered by an extant or recently expired planning permission for the same or substantially the same development, or has there been an application submitted but not determined since the vacant buildings credit was reintroduced and vacant buildings credit not sought? Vacant buildings credit will not be applied in these circumstances.

Calculating the Credit

Once the Council concludes that vacant buildings credit should be applied, the following process will apply:

1. Confirm to the applicant that the vacant buildings credit will be applied
2. Calculate the Gross Internal Area (GIA) floorspace of the existing building/s as a proportion of the proposed GIA floor space of the



proposed redevelopment to give the Credit Proportion (Note: for wholly residential schemes this will be the total GIA of all proposed dwellings, for mixed use schemes the GIA of the proposed future residential elements only will be used). All calculations will be rounded to the nearest square metre

3. Apply this Credit Proportion as a reduction to the Affordable obligation

Where a vacant buildings credit calculation results in a part dwelling requirement this will be rounded up to the next whole affordable dwelling, e.g. a requirement for 1.25 affordable dwellings after vacant buildings credit has been applied will be rounded to 2 whole affordable dwellings.

Worked example of the application of the credit:

- A proposal to provide a 25 unit (1875sqm @ 75sqm each) 2 bed housing scheme on a Brownfield site on which currently sits a vacant building of 300sqm.
- Where the scheme should normally provide 7.5 – rounding to 8 AH (@30%)
- The process is simply to apply the Credit Proportion, or as an example:
- Credit Proportion is $(300\text{sqm} / 1875) = 0.16$ proportion or 16%. Therefore 16% shall be deducted from the on-site affordable housing requirement as follows: 16% of 8 AH = 1.28. 8 minus

$1.28 = 6.72$ rounds back up to 7 Therefore the total number of affordable units required is 7.

For off-site contributions which have been exceptionally justified, the Council's off site affordable commuted sum (see Chapter 5) shall be applied to the net number of affordable dwellings which would be required after the credit has been applied.

The affordable housing obligations will be calculated as a representative mix of the overall residential development for the purposes of calculating any subsequent commuted sum.



Appendix 4 List of Photographs

All photographs are sourced by East Suffolk Council, unless otherwise stated. The locations of photographs used in the document are listed below

- Front cover – clockwise from top left:
Felixstowe; Framlingham; Halesworth; Southwold; Brampton
- Chapter 2 title page – Halesworth
- Chapter 3 title page – Felixstowe
- Chapter 4 title page - Southwold
- Chapter 5 title page – Lowestoft
- Chapter 6 title page – Brampton
- Chapter 7 title page – Southwold
- Page 37 – Goldsmith Street, Norwich
- Page 40 – Former Deben High School site proposed development, Felixstowe (Source – Tate Hindle Architects for East Suffolk Council) www.tatehindle.co.uk
- Page 42 – Former Deben High School site proposed development, Felixstowe (Source – Tate Hindle Architects for East Suffolk Council) www.tatehindle.co.uk
- Page 47 – Goldsmith Street, Norwich
- Page 48 – Brampton
- Chapter 8 title page - Bawdsey
- Chapter 9 title page – Framlingham
- Chapter 10 title page – Framlingham
- Chapter 11 title page - Felixstowe

Write to us



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This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

www.eastsuffolk.gov.uk/Planning

Consultation Statement

Affordable Housing Supplementary Planning Document

April 2022



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1 Introduction

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

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

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

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

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

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

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

2. Who was consulted?

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

Initial consultation

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

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

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

Consultation on the Draft SPD

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

3. How were they consulted?

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

Initial consultation

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

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

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

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

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

The consultation asked the following questions:

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

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

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

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

Consultation on the Draft SPD

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

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

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

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

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

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

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

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

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

Appendix 1 – Initial Consultation – Social Media



Appendix 2 – Initial Consultation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Agenda topics:

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

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

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

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

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

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

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

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

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

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

Appendix 4 – Consultation Bodies

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

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

Specific consultation bodies

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

General consultation bodies

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

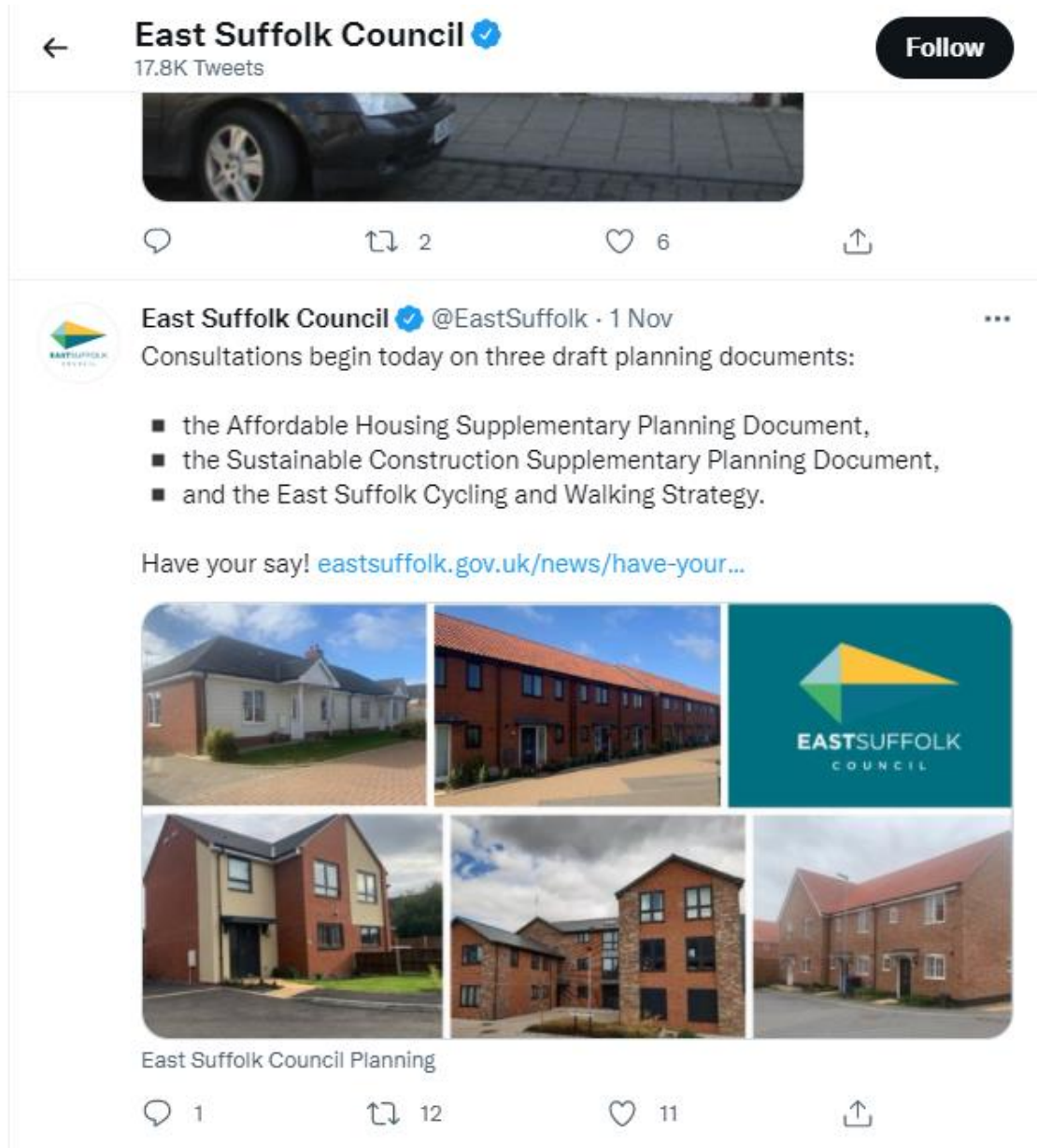
- Bodies which represent the interests of environmental groups in the District

Other individuals and organisations

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

Appendix 5 – Consultation Promotion

Twitter – 1st November 2021



Twitter – 22nd November 2021



Facebook – 24th November 2021

**East Suffolk Council**
2 mins · 🌐

Have your say! 💬

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

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


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



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Press Release – 1st November 2021



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[Home](#) > [News](#) > [Have your say on draft planning documents](#)

Have your say on draft planning documents

Posted by on 1 November 2021 | Comments

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

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

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

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

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

This consultation is now closed.

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

This consultation is now closed.

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

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

This consultation is now closed.



Consultation Poster



Have your say

Draft Sustainable Construction Supplementary Planning Document

Draft Affordable Housing Supplementary Planning Document

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

Draft Cycling and Walking Strategy

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

What are we doing?

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

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



How can you get involved?

GIVE YOUR VIEWS

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

Find out more and give your views:
www.eastsuffolk.gov.uk/planning-policy-consultations

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

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

Appendix 6 – Consultation responses

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

1. Introduction

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

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

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

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

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

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

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

2. Types of affordable housing

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

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

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

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

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Saffron Housing Trust (Pathfinder Development Consultants) (Aust, Martin)	57	<p>2.2 3rd paragraph should include 'inclusive of service charges' to correspond with Homes England and NPPF definitions.</p> <p>2.3 should refer to community groups</p>	<p>2.2 The first paragraph includes the words 'inclusive of service charges'</p> <p>2.3 Agree, this change would add clarity</p> <p>2.5 Agree, this change would add clarity</p>	<p>2.2 No change needed.</p> <p>2.3 The text "(where registered with the Regulator of Social Housing)" has been added</p>

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

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

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

3. Identifying an appropriate mix of affordable housing

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Section 106 agreements

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

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

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

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

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

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

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

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

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

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

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

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

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

5. Financial contributions

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

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

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

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

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

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

6. Exception Sites

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

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

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

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

7. Design

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

8. Local Housing Needs Assessments

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

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

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

9. Viability assessments

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

11. Community Infrastructure Levy

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

12. Making an Application

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

Appendix 1 Affordable Housing Needs by Tenure

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

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

Appendix 2 Section 106 Model Heads of Terms and Template Clauses

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

General Comments

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

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

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

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

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

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

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



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Strategic Environmental Assessment Screening Opinion

Draft Affordable Housing Supplementary Planning Document

October 2021 (Updated April 2022)

Contents

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1. Introduction

The Affordable Housing Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, excluding the parts of East Suffolk that are within the Broads National Park, for which the Broads Authority is the local planning authority.

In some circumstances a Supplementary Planning Document could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the Affordable Housing Supplementary Planning Document require a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the SPD and the need for a full SEA. This SEA report reviews an early draft of the Affordable Housing Supplementary Planning Document (SPD).

This screening report was updated in April 2022 to reflect the receipt of a consultation response from the Environment Agency (see page 2). This does not change the screening conclusions.

2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and

land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the SPD to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

3. Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the SPD triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations;
and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account. The Council consulted with the three consultation bodies and provided five weeks for a response. Responses were received prior to public consultation on the Draft SPD from Historic England and Natural England and these are contained in Appendix 1. The Environment Agency responded in November 2021 and their response is also contained in Appendix 1.

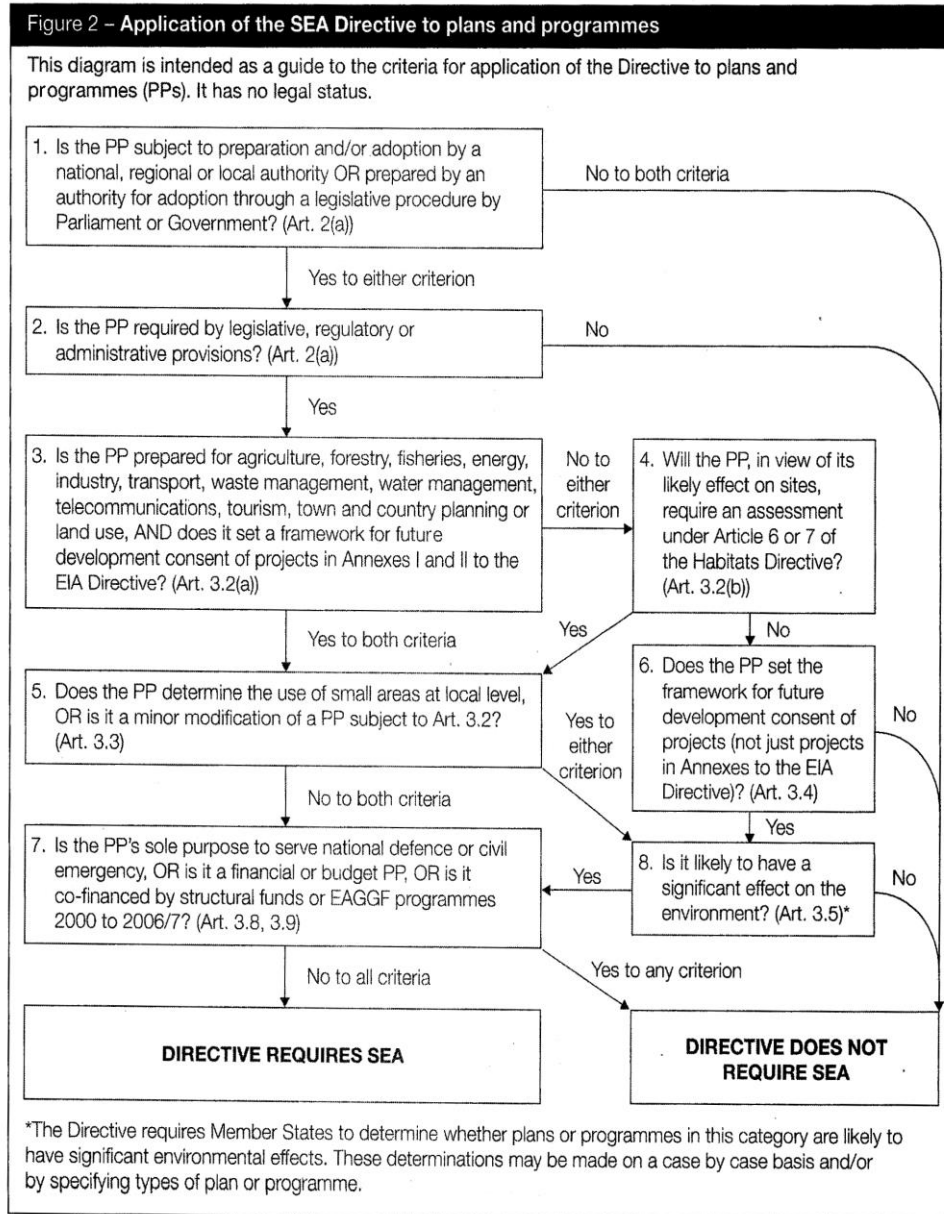
Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

- 1. The characteristics of plans and programmes, having regards, in particular to:
 - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.

- b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.
 - c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
 - d. Environmental problems relevant to the plan or programme.
 - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
- a. The probability, duration, frequency and reversibility of the effects.
 - b. The cumulative nature of the effects.
 - c. The trans boundary nature of the effects.
 - d. The risks to human health or the environment (e.g. due to accidents).
 - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - f. the value and vulnerability of the area likely to be affected due to:
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values;
 - iii. intensive land-use; and
 - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the Supplementary Planning Document will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the draft Affordable Housing Supplementary Planning Document (SPD) is being carried out by East Suffolk Council. The SPD is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. The production of the SPD forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

The SPD is prepared in support of the delivery of town and country planning and land use policies.

The SPD will not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This has determined that a full Appropriate Assessment is not required.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The draft Affordable Housing Supplementary Planning Document will be a material consideration in the determination of planning applications and will be applied alongside the policy framework provided by the Local Plans.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The guidance contained in the Affordable Housing Supplementary Planning Document will provide information and advice concerning the implementation of the Council's Local Plan policies on affordable housing. The SPD will provide guidance on policies within both the Suffolk Coastal Local Plan and the Waveney Local Plan, specifically policies SCLP5.10 'Affordable Housing on Residential Developments' and SCLP5.11 'Affordable Housing on Exception Sites' of the Suffolk Coastal Local Plan and policies WLP8.2 'Affordable Housing' and WLP8.6 'Affordable Housing in the Countryside' of the Waveney Local Plan. It is unlikely that the SPD will have a significant impact upon the environment. All policies within both Local Plans have been subject to a full Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment.

5. Conclusion

The Affordable Housing Supplementary Planning Document will support the implementation of policies in the East Suffolk Council - Suffolk Coastal Local Plan (adopted September 2020) and the East Suffolk Council - Waveney Local Plan (adopted March 2019) which were both subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of draft Affordable Housing Supplementary Planning Document to ensure compliance with SEA legislation.

Signed:



Dated: 08/04/2022

Desi Reed

Planning Manager (Policy, Delivery and Specialist Services)
East Suffolk Council

Appendix 1: Responses from Statutory Consultees

25th October 2021

Dear Andrea

RE: Supplementary Planning Documents - Draft Strategic Environmental Assessment Screening

Thank you for consulting Historic England on the SEA Screening Opinions for both the draft Affordable Housing, and Sustainable Construction Supplementary Planning Documents (SPD). As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

Having reviewed both reports I can confirm that we support the conclusion that it is not necessary to conduct a Strategic Environment Assessment of either SPD.

Conclusion

We look forward to engaging with you as these proposals progress over the coming months. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me. I would be grateful if you could confirm receipt of this email.

Yours sincerely,

Andrew Marsh BSc MA MRTPI
Historic Environment Planning Adviser
Development Advice | East of England
Historic England

Historic England
Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Date: 26 October 2021
Our ref: 368549
Your ref:



Andrea.McMillan@eastsoffolk.gov.uk
BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Andrea McMillan,

Planning Consultation: Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) screening opinion for the draft Affordable Housing Supplementary Planning Document (SPD)

Thank you for your consultation on the above dated 21 September 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Opinion Request: Strategic Environmental Assessment and Habitats Regulation Assessment

Habitats Regulations Assessment

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view.

Strategic Environmental Assessment

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects on the environment as a result of the proposal are unlikely to occur. On the basis of the information provided, Natural England concurs with this view.

If you have any queries relating to the advice in this letter please contact me on [REDACTED]

Yours faithfully

Sam Kench
Norfolk and Suffolk Team

From: Ipswich, Planning [REDACTED]
Sent: 22 November 2021 08:57
To: Andrea McMillan
Subject: RE: Supplementary Planning Documents - Draft Strategic Environmental Assessment Screening

Dear Andrea

Apologies for only just replying to your email and thank you for the confirmation. I've taken a quick scan through the document and don't have any initial comments. I note we have missed the deadline so please do let me know if you'd like us to have a look in any further detail.

Kind Regards

Liam

Liam Robson

Sustainable Places Planning Advisor – East Anglia Area (East)

Environment Agency | [REDACTED]

Please be aware that due to COVID-19 – any post will not be picked up. Please direct all correspondence electronically.



From: Andrea McMillan [REDACTED]
Sent: 26 October 2021 11:50
To: Ipswich, Planning [REDACTED]
Subject: RE: Supplementary Planning Documents - Draft Strategic Environmental Assessment Screening

Dear Liam

Thank you for your response. Apologies for any confusion, however I was seeking your views on the draft Strategic Environmental Assessment Screening Opinions which conclude that it is not considered that SEA will be required for the Supplementary Planning Documents. A consultation on the two SPDs themselves will be taking place between 1st November and 13th December and you will therefore be able to comment on these during this time.

In the meantime I would be grateful if you could respond in relation to the SEA screening to confirm whether you concur or otherwise with our conclusion. We will be publishing the SEA Screening Opinions alongside the SPDs on 1st November and if you are therefore able to provide a response in relation to this over the next couple of days it would be very much appreciated.

Please let me know if you have any queries. I have re-attached the original email which contains all four attachments.

Kind Regards
Andrea



Andrea McMillan BSc(Hons) MRTPI
Principal Planner (Policy and Delivery)
East Suffolk Council

www.eastsuffolk.gov.uk
www.eastsuffolkmeansbusiness.co.uk

East Suffolk Council will continue to review and prioritise the delivery of its services during this unprecedented time.
The COVID-19 outbreak will severely impact what we are able to do, however we will continue to support and protect our communities, delivering the critical services you need.

From: Ipswich, Planning [REDACTED]
Sent: 26 October 2021 09:15
To: Andrea McMillan [REDACTED]
Subject: RE: Supplementary Planning Documents - Draft Strategic Environmental Assessment Screening

Dear Andrea

I hope you are well. Thank you for your consultation. I am afraid I have only just got to this consultation so haven't been able to make detailed comments. However, we are pleased to see that you have included the optimal 110 litres per day water consumption target in your Sustainable Construction SPD.

I can confirm that we have no comments on the Affordable Housing Supplementary Planning Document.

Kind Regards

Liam

Liam Robson

Sustainable Places Planning Advisor – East Anglia Area (East)

Environment Agency | [REDACTED]

Please be aware that due to COVID-19 – any post will not be picked up. Please direct all correspondence electronically.



CORONAVIRUS
PROTECT YOURSELF & OTHERS

For the latest guidance:
- INTRANET.EA.GOV
- NHS.UK/coronavirus
- GOV.UK/coronavirus

Environment Agency

From: Andrea McMillan [REDACTED]
Sent: 21 September 2021 17:06

To: Ipswich, Planning [REDACTED]

Subject: Supplementary Planning Documents - Draft Strategic Environmental Assessment Screening

Dear Sir/Madam,

Please find attached Strategic Environmental Assessment draft screening opinions relating to two documents that the Council is preparing – the Affordable Housing Supplementary Planning Document and the Sustainable Construction Supplementary Planning Document, on which I would be grateful for your response. I also attach the working draft versions of the Supplementary Planning Documents on which the screening is based – please note these are not currently publicly available so please treat as confidential.

The draft screening opinion concludes that no further SEA work is required.

I would be grateful if you could respond within five weeks, by **Tuesday 26th October 2021**.

If you have any queries or require any assistance please do not hesitate to contact me.

Kind Regards

Andrea McMillan



Andrea McMillan BSc(Hons) MRTPI
Principal Planner (Policy and Delivery)
East Suffolk Council
[REDACTED]

www.eastsuffolk.gov.uk
www.eastsuffolkmeansbusiness.co.uk

East Suffolk Council will continue to review and prioritise the delivery of its services during this unprecedented time.
The COVID-19 outbreak will severely impact what we are able to do, however we will continue to support and protect our communities, delivering the critical services you need.



Habitats Regulations Assessment Screening Statement

Draft Affordable Housing Supplementary Planning Document

October 2021

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1. Introduction

1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.

1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).

1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) states:

'Where a land use plan:

(a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'

1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.

Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European

Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.

Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.

- 1.5 The draft Affordable Housing Supplementary Planning Document (SPD) is being produced by East Suffolk Council. The SPD will apply to the whole of the East Suffolk Council area, outside of the Broads. This report considers whether there are likely to be significant effects on protected Habitat sites and where a full Appropriate Assessment may be required.
- 1.6 East Suffolk (outside of the Broads) is covered by two Local Plans, the East Suffolk Council - Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019.
- 1.7 Both Local Plans were subject to Habitats Regulations Assessment as part of their production. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Plans, resulting in conclusions that the plans will not lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts. Both Appropriate Assessments identified recreational disturbance particularly from dog walkers as a significant effect. The Council has subsequently produced a Recreational Avoidance and Mitigation Strategy and requires payment towards mitigation from residential developments within 13km of the protected Habitat sites.

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

2. Protected sites covered by this report

- 2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of East Suffolk Council. The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessments for the Local Plans.

Table 1: Relevant Habitat sites

Name
Alde-Ore and Butley Estuaries SAC,
Alde-Ore Estuary SPA, Ramsar
Benacre to Easton Bavents SPA
Benacre to Easton Bavents Lagoons SAC
Breydon Water SPA, Ramsar
Broadland SPA, Ramsar
Deben Estuary SPA, Ramsar
Dew's Ponds SAC
Great Yarmouth North Denes SPA
Haisborough, Hammond and Winterton SAC
Minsmere to Walberswick Heaths & Marshes SAC
Minsmere – Walberswick SPA, Ramsar
Norfolk Valley Fens SAC
Outer Thames Estuary SPA
Orfordness – Shingle Street SAC
Sandlings SPA
Southern North Sea SAC
Staverton Park and The Thicks, Wantisden SAC
Stour and Orwell Estuaries SPA, Ramsar
The Broads SAC
Winterton-Horsey Dunes SAC

3. Affordable Housing Supplementary Planning Document

- 3.1 This HRA report reviews an early draft of the Affordable Housing Supplementary Planning Document (SPD).
- 3.2 The draft Affordable Housing SPD provides information and advice concerning the delivery of affordable housing. The overarching aim of the SPD is to facilitate the delivery of policy compliant affordable housing. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk relating to the delivery of affordable housing. The SPD, when adopted, will be a material consideration in determination of applications for planning permission. The SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 3.3 Chapter 1 of the SPD is descriptive, setting out the policy context and purpose of the SPD and describing some key elements of affordable housing that are covered in the document. This chapter has therefore not been included in the screening table in section 5 of this report.
- 3.4 The other chapters provide guidance to support the preparation and determination of any planning applications which involve affordable housing, or for which the Local Plan policies concerning affordable housing are relevant. These chapters have all been included in the screening table in section 5.
- 3.5 The SPD also includes 3 appendices. These provide additional detail to support the main body of the SPD but do not in themselves introduce any new requirements and have therefore not been included in the screening table in section 5 of this report.

4. Other Plans and Projects

- 4.1 Regulation 105 of the Habitats Regulations requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.
- 4.2 As noted in the introduction, the other key plans are the Local Plans. The Local Plans set out the broad scale and distribution of development across the area of East Suffolk formerly covered by Suffolk Coastal District and Waveney District.
- 4.3 The draft Affordable Housing Supplementary Planning Document (SPD) adds detail to policies within both the Suffolk Coastal Local Plan and the Waveney Local Plan, specifically policies SCLP5.10 and 5.11 of the Suffolk Coastal Local Plan and policies WLP8.2 and 8.6 of the Waveney Local Plan.
- 4.4 A screening process considered each policy in the Suffolk Coastal and Waveney Local Plans and concluded whether significant effects were likely and if Appropriate Assessment was therefore needed. The Appropriate Assessments of the Suffolk Coastal and Waveney Local Plans considered the following themes:
- Recreation pressure,
 - Air quality and traffic emissions,
 - Biodiversity net gain,
 - Urbanisation,
 - Water quality, resources and treatment, and
 - Flood risk and coastal erosion.
- 4.5 Mitigation measures were identified within the Appropriate Assessments and incorporated within both Local Plans, resulting in a conclusion that neither plan would lead to any adverse effects on Habitat sites within and in the vicinity of the (then) Suffolk Coastal and Waveney Districts.

5. Assessment of likely significant effects of the Draft Affordable Housing Supplementary Planning Document (SPD) on Habitat sites

- 5.1 Table 3 below considers each relevant section of the draft Affordable Housing Supplementary Planning Document (SPD) in relation to whether there is potential for a likely significant effect on protected Habitat sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Table 3: Likely significant effects of the Draft Affordable Housing Supplementary Planning Document

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
2. Types of affordable housing	This chapter is mostly descriptive, setting out the different types of housing that constitute affordable housing. It includes sections on affordable housing tenures, community led housing, affordable self-build and custom build housing. This chapter does not in itself promote development and will not lead to likely significant effects on Habitat Sites.	None	None	No
3. Identifying an appropriate mix of affordable housing	This chapter explains the Council's approach to affordable housing tenure mix. Information regarding the sections of the relevant Strategic Housing Market Assessments is provided. This chapter also sets out Council's approach to First Homes, affordable specialist housing provision, build to rent, and provides further guidance on the use of Council's housing register to evidence local housing need. This section simply clarifies the approach to affordable housing mix and does not in itself promote development. This chapter will therefore	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	not lead to likely significant effects on Habitat Sites.			
4. Section 106 agreements	This section explains the legal mechanisms that the Council will use to secure affordable housing. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
5. Financial contributions	This chapter explains the Council's approach to the provision of financial contributions in lieu of on-site affordable housing provision. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
6. Exception Sites	This chapter sets out the Council's approach to the consideration of exception sites/ affordable housing in countryside i.e affordable housing schemes outside settlement boundaries. This chapter expands on the guidance set out in policies SCLP5.11 Affordable Housing on Exception Sites and WLP8.6 Affordable Housing in the	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	Countryside. Both these policies were considered as part of the Local Plan HRA reports and no Likely Significant Effects were identified. This chapter will not lead to likely significant effects on Habitat Sites.			
7. Design	This chapter provides guidance on the key design policies that the Council will apply when considering mixed-tenure or solely affordable housing developments. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
8. Local Housing Needs Assessments	The chapter provides guidance on the production and assessment of local housing needs assessments. This section does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
9. Viability assessments	The explains the Council's approach to viability assessments submitted in support of schemes where a reduced amount of affordable housing in being proposed. This section does not in itself promote	None	None	No

Chapter	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?
	development and will therefore not lead to likely significant effects on Habitat Sites.			
10. Vacant buildings credit	This section explains the Council's approach to applying vacant building credit. This incentivises the development of brownfield land but does not in itself promote development and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
11. Community Infrastructure Levy	Sets out the Council's approach to CIL relief on schemes for affordable housing. This section simply clarifies the policy and does not in itself promote development. This chapter will therefore not lead to likely significant effects on Habitat Sites.	None	None	No
12. Making an Application	This section explains the process for applying for planning permission for schemes including an element of affordable housing. It explains the evidence and supporting documents that will need to be submitted alongside such applications. This chapter is descriptive, does not in itself promote development, and will therefore not lead to likely significant effects on Habitat Sites.	None	None	No

6. Summary and conclusions

- 6.1 The draft Affordable Housing Supplementary Planning Document (SPD) provides additional guidance to inform the determination of planning applications alongside the Waveney and Suffolk Coastal Local Plans. The draft Affordable Housing SPD provides information and advice concerning the delivery of affordable housing, with an overarching aim of facilitating the delivery of policy compliant affordable housing. The guidance contained in the draft SPD will assist in the implementation of Local Plan and Neighbourhood Plan policies for East Suffolk relating to affordable housing. The SPD, when adopted, be a material consideration in the determining of applications for planning permission.
- 6.2 Natural England were consulted on a draft of this Screening Statement as statutory nature conservation body. Their response is contained in Appendix 4.
- 6.3 Implementation of the Affordable Housing Supplementary Planning Document will not lead to likely significant effects on protected Habitat sites.

Signed: 

Dated: 27/10/2021

Desi Reed
Planning Policy and Delivery Manager
East Suffolk Council

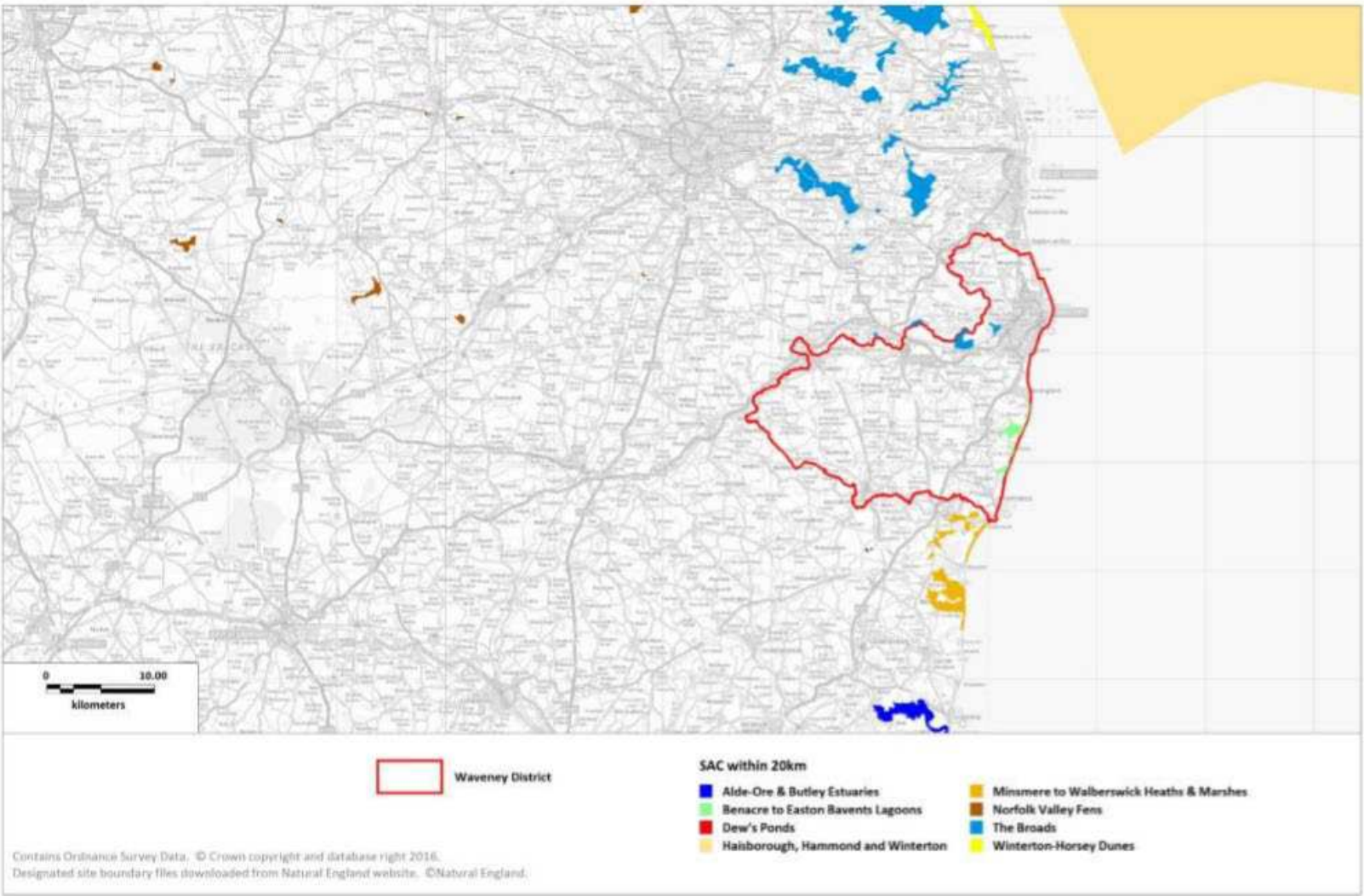
Appendix 1: Sources of background information

- East Suffolk Council – Suffolk Coastal Local Plan (September 2020)
- East Suffolk Council – Waveney Local Plan (March 2019)
- Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan stage (incorporating Main Modifications) (May 2020)
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018)
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019)

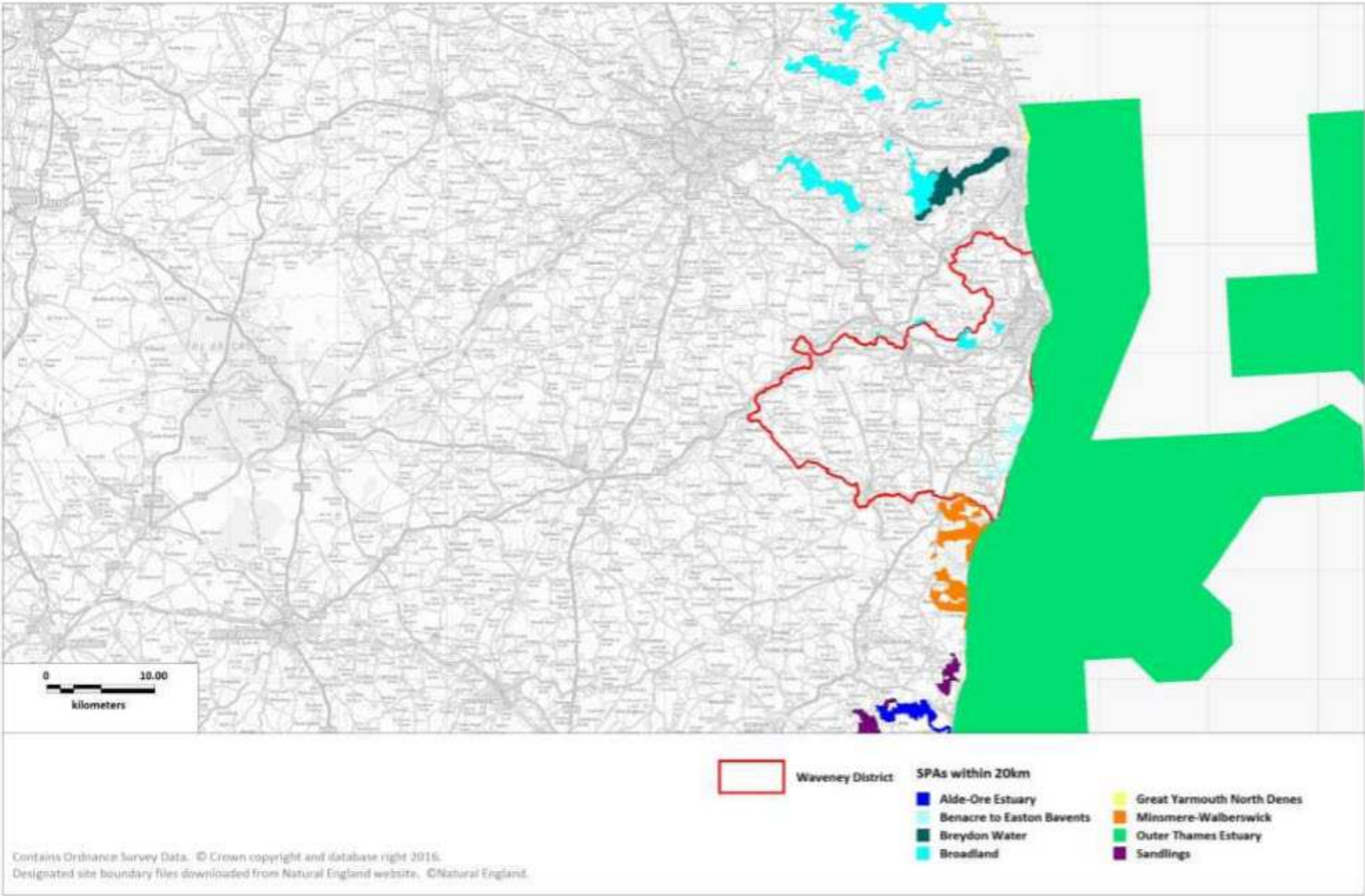
Appendix 2: Locations of Habitat sites

Habitat sites within 20km of the East Suffolk Council-
Waveney Local Plan Area

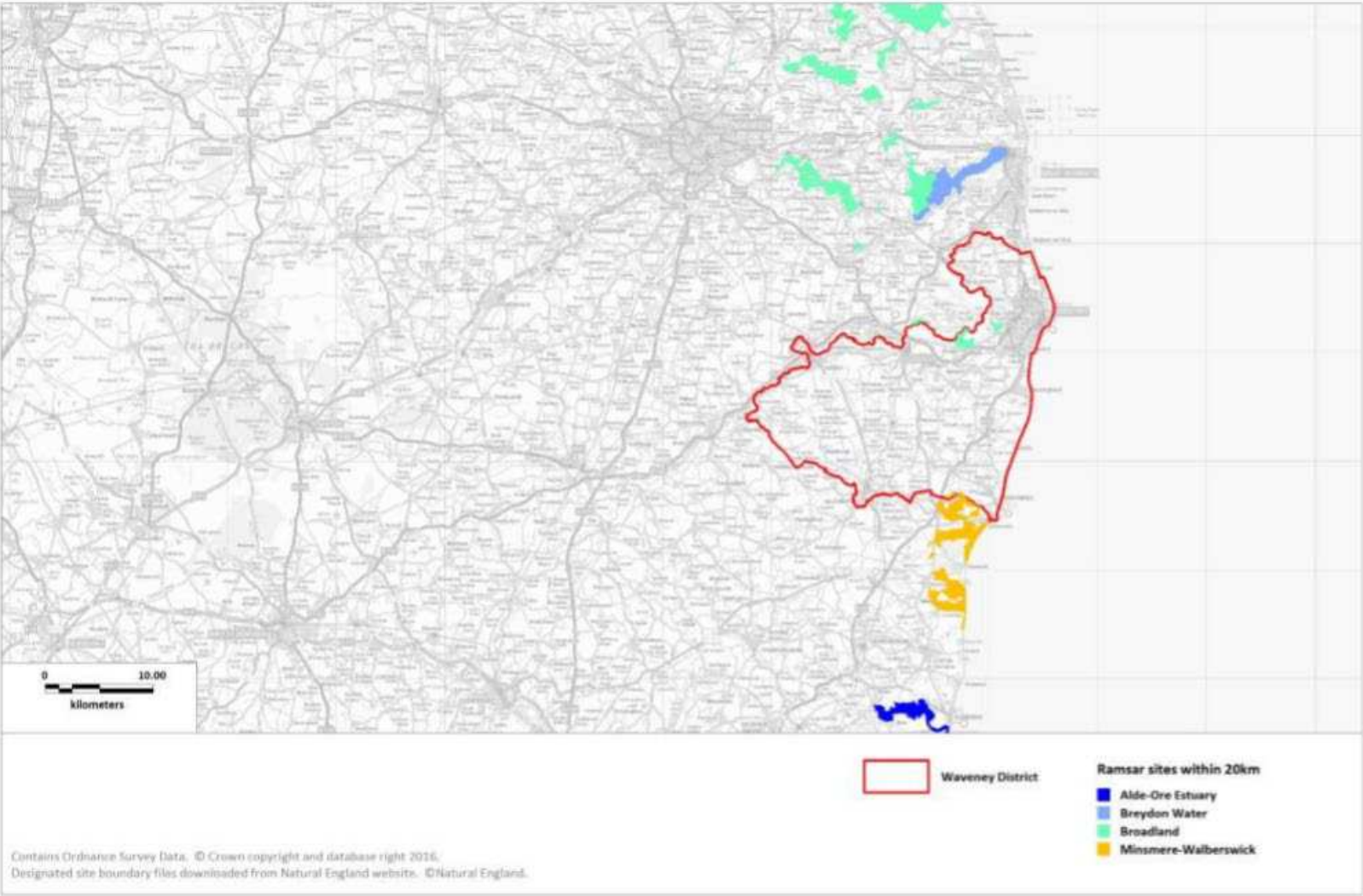
Map 1: SACs



Map 2: SPAs

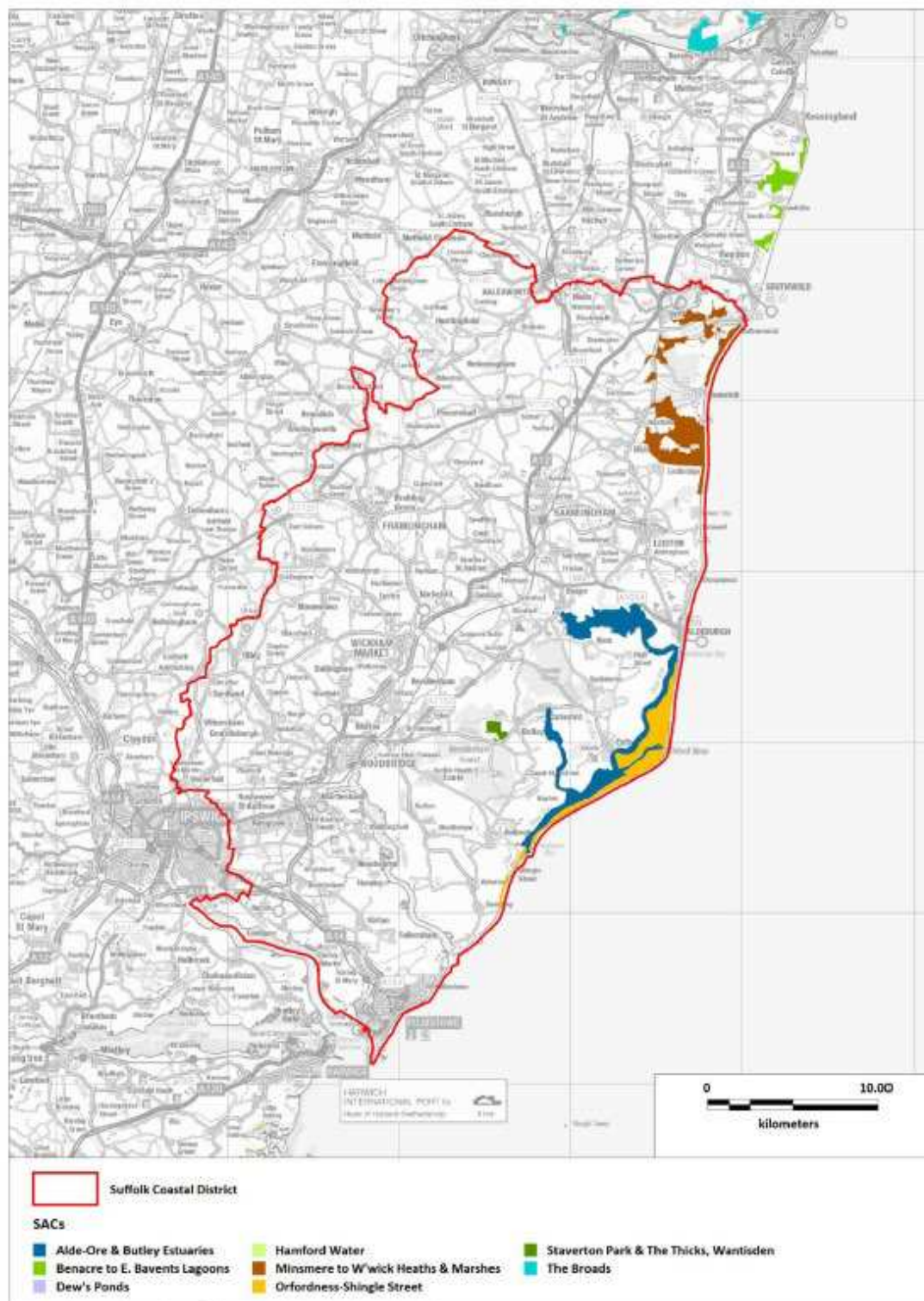


Map 3: Ramsar Sites



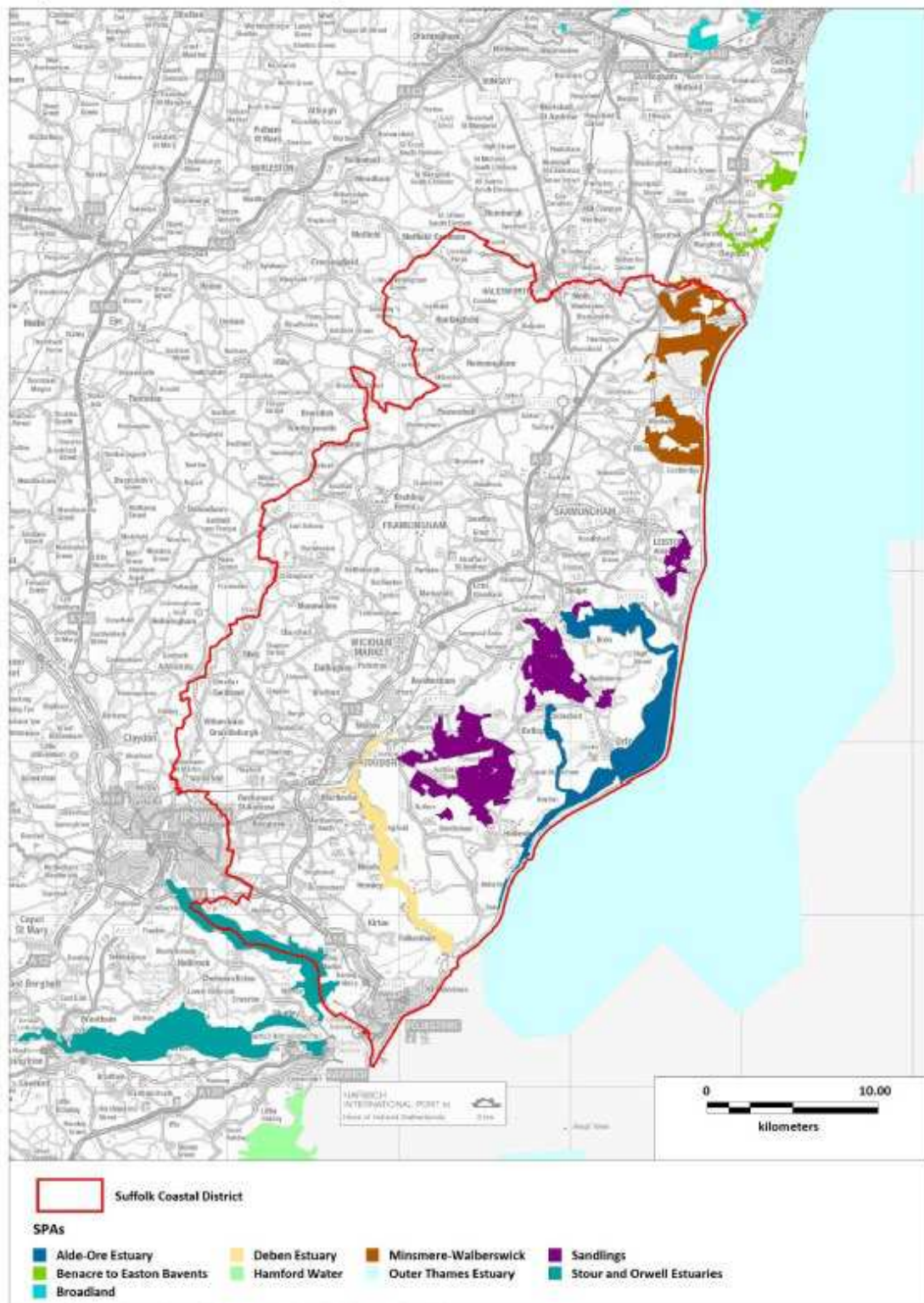
Habitat sites within 20km of the East Suffolk Council- Suffolk Coastal Local Plan Area

Map 1: SAC sites where boundary within 20km of Suffolk Coastal District



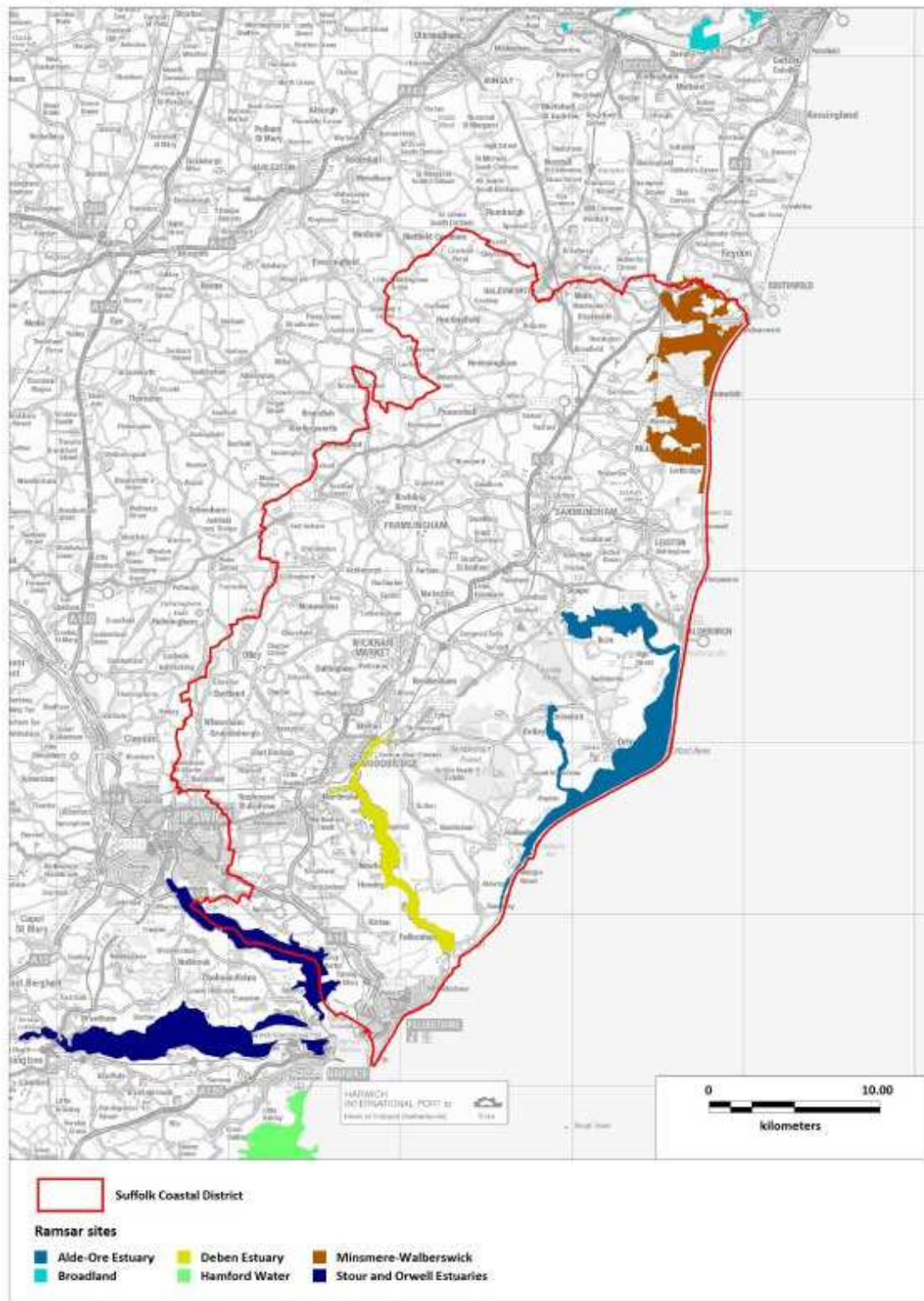
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Contains Natural England information © Natural England and Database Right. All rights Reserved.

Map 2: SPA sites where boundary within 20km of Suffolk Coastal District



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Map 3: Ramsar sites where boundary within 20km of Suffolk Coastal District



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Appendix 3: Relevant Habitat sites

Name	Qualifying features	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Suffolk Coastal Local Plan at Final Draft Plan Stage (December 2018))
Special Areas of Conservation			
Alde-Ore and Butley Estuaries	H1130: Estuaries H1140: Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats H1330: Atlantic salt meadows	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine) (Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)
Benacre to Easton Barents Lagoons	H1150# Coastal lagoons, A195(B) <i>Sterna albifrons</i> : Little tern A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats,	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).

		The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Dew's Ponds	S1166 Triturus cristatus: Great crested newt	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of the habitats of qualifying species, The structure and function of the habitats of qualifying species, The supporting processes on which the habitats of qualifying species rely, The populations of qualifying species, and, The distribution of qualifying species within the site.	None identified
Minsmere to Walberswick Heath and Marshes	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats,	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)

	<p>A082(NB) <i>Circus cyaneus</i>: Hen harrier</p> <p>A224(B) <i>Caprimulgus europaeus</i>: European nightjar</p> <p>A056(B) <i>Anas clypeata</i>: Northern shoveler</p> <p>A056(NB) <i>Anas clypeata</i>: Northern shoveler</p> <p>A051(B) <i>Anas strepera</i>: Gadwall</p> <p>A051(NB) <i>Anas strepera</i>: Gadwall</p> <p>A132(B) <i>Recurvirostra avosetta</i>: Pied avocet</p> <p>A195(B) <i>Sterna albifrons</i>: Little tern</p> <p>A394(NB) <i>Anser albifrons</i>: Greater white-fronted goose</p>	<p>The structure and function (including typical species) of qualifying natural habitats, and,</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	
Orfordness – Shingle Street	<p>H1150: Coastal Lagoons</p> <p>H1210: Annual vegetation of drift lines</p> <p>H1220: Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:</p> <p>The extent and distribution of qualifying natural habitats;</p> <p>The structure and function (including typical species) of qualifying natural habitats; and</p> <p>The supporting processes on which qualifying natural habitats rely.</p>	Not identified in Suffolk Coastal Final Draft Local Plan HRA.

Staverton Park and The Thicks, Wantisden	H9190: Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains; Dry oak-dominated woodland.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.	Woodland management, disease, atmospheric pollution.
The Broads	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) H7140 Transition mires and quaking bogs	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

	<p>H3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp</p> <p>H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation</p> <p>S1355 Lutra lutra: Otter</p> <p>S1903 Liparis loeselii: Fen orchid</p> <p>S4056 Anisus vorticulus: Little ramshorn whirlpool snail</p>	The populations of qualifying species, and, The distribution of qualifying species within the site.	
Special Protection Areas			
Alde-Ore Estuary (also Ramsar site)	<p>A081: Eurasian marsh harrier (breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A132: Pied avocet (breeding)</p> <p>A151: Ruff (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>A183: Lesser black-backed gull (breeding)</p> <p>A191: Sandwich tern (breeding)</p> <p>A195: Little tern (breeding)</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	<p>Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)</p> <p>(Alde-Ore and Butley Estuaries SAC and Alde-Ore SPA)</p>
Benacre to Easton Bavents	<p>H1150# Coastal lagoons,</p> <p>A195(B) Sterna albifrons: Little tern</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to</p>	<p>Public access/disturbance, water pollution, physical modification, changes</p>

	A021(B) <i>Botaurus stellaris</i> : Great bittern A081(B) <i>Circus aeruginosus</i> : Eurasian marsh harrier	achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	in species distributions, fisheries (marine and estuarine).
Broadlands (also Ramsar site)	H7210# Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> S1016 <i>Vertigo moulinsiana</i> : Desmoulin's whorl snail H7230 Alkaline fens H6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) H91E0# Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>) H7140 Transition mires and quaking bogs H3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species, The structure and function (including typical species) of qualifying natural habitats, The structure and function of the habitats of qualifying species, The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, The populations of qualifying species, and,	Water pollution, climate change, invasive species, siltation, inappropriate water levels, hydrological changes, water abstraction, change in land management, inappropriate ditch management, inappropriate scrub control, changes in species distributions, public access/disturbance, undergrazing, drainage, direct impact from 3rd party

	H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation S1355 Lutra lutra: Otter S1903 Liparis loeselii: Fen orchid S4056 Anisus vorticulus: Little ramshorn whirlpool snail	The distribution of qualifying species within the site.	
Deben Estuary (also Ramsar site)	A046a: Dark bellied brent goose (non-breeding) A132: Pied avocet (non-breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Coastal squeeze, disturbance to birds, water and air pollution.
Outer Thames Estuary	A001: Red-throated Diver (Non-breeding) A195: Common Tern (Breeding) A193: Little Tern (Breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features;	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
Minsmere to Walberswick (also Ramsar site)	<p>H4030 European dry heaths</p> <p>H1210 Annual vegetation of drift lines</p> <p>H1220 Perennial vegetation of stony banks</p> <p>A052(B) <i>Anas crecca</i>: Eurasian teal</p> <p>A021(B) <i>Botaurus stellaris</i>: Great bittern</p> <p>A081(B) <i>Circus aeruginosus</i>: Eurasian marsh harrier</p> <p>A082(NB) <i>Circus cyaneus</i>: Hen harrier</p> <p>A224(B) <i>Caprimulgus europaeus</i>: European nightjar</p> <p>A056(B) <i>Anas clypeata</i>: Northern shoveler</p> <p>A056(NB) <i>Anas clypeata</i>: Northern shoveler</p> <p>A051(B) <i>Anas strepera</i>: Gadwall</p> <p>A051(NB) <i>Anas strepera</i>: Gadwall</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <p>The extent and distribution of the habitats of the qualifying features,</p> <p>The structure and function of the habitats of the qualifying features,</p> <p>The supporting processes on which the habitats of the qualifying features rely,</p> <p>The population of each of the qualifying features, and,</p> <p>The distribution of the qualifying features within the site.</p>	<p>Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)</p>

	A132(B) <i>Recurvirostra avosetta</i> : Pied avocet A195(B) <i>Sterna albifrons</i> : Little tern A394(NB) <i>Anser albifrons</i> : Greater white-fronted goose		
Outer Thames Estuary	A001 (W) <i>Gavia stellata</i> Red-throated Diver A195 (B) <i>Sterna hirundo</i> Common Tern A193 (B) <i>Sternula albifrons</i> Little Tern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; The extent and distribution of the habitats of the qualifying features, The structure and function of the habitats of the qualifying features, The supporting processes on which the habitats of the qualifying features rely, The population of each of the qualifying features, and, The distribution of the qualifying features within the site.	Not identified in Suffolk Coastal Final Draft Local Plan HRA. SIP identifies fisheries.
Sandlings	A224: European nightjar (breeding) A246: Woodlark (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features;	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.

		<p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	
Stour and Orwell Estuaries (also Ramsar site)	<p>A046a: Dark bellied brent goose (non-breeding)</p> <p>A054: Northern pintail (non-breeding)</p> <p>A132: Pied avocet (non-breeding)</p> <p>A141: Grey plover (non-breeding)</p> <p>A143: Red knot (non-breeding)</p> <p>A149: Dunlin (non-breeding)</p> <p>A156: Black-tailed godwit (non-breeding)</p> <p>A162: Common redshank (non-breeding)</p> <p>Waterbird assemblage</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <p>The extent and distribution of the habitats of the qualifying features;</p> <p>The structure and function of the habitats of the qualifying features;</p> <p>The supporting processes on which the habitats of the qualifying features rely;</p> <p>The population of each of the qualifying features; and</p> <p>The distribution of the qualifying features within the site.</p>	Coastal squeeze, disturbance to birds, air pollution and new development.

Appendix 4: Natural England Consultation Response

Date: 26 October 2021
Our ref: 368549
Your ref:



Andrea.McMillan@eastsoffolk.gov.uk
BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Andrea McMillan,

Planning Consultation: Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) screening opinion for the draft Affordable Housing Supplementary Planning Document (SPD)

Thank you for your consultation on the above dated 21 September 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Opinion Request: Strategic Environmental Assessment and Habitats Regulation Assessment

Habitats Regulations Assessment

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view.

Strategic Environmental Assessment

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects on the environment as a result of the proposal are unlikely to occur. On the basis of the information provided, Natural England concurs with this view.

If you have any queries relating to the advice in this letter please contact me on [REDACTED].

Yours faithfully

Sam Kench
Norfolk and Suffolk Team

Equality Impact Assessment Screening Opinion

Affordable Housing Supplementary
Planning Document

October 2021



Introduction

1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified, then a full Equalities Impact Assessment will be required.
2. Chapter 1 provides an introduction to the Affordable Housing SPD. The overarching aim of the SPD is to facilitate the delivery of affordable housing in accordance with the Local Plan policies. The guidance contained in this SPD will assist in the implementation of policies contained in the Local Plans for East Suffolk regarding affordable housing, and as an SPD this guidance will, when adopted, be a material consideration in determining applications for planning permission.
3. This SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
4. The guidance in the SPD may also be relevant to the implementation of Neighbourhood Plan policies that relate to affordable housing.
5. This document provides guidance which will be relevant during the preparation and determination of any planning applications which involve affordable housing, or for which the Local Plan policies concerning affordable housing are relevant.
6. 1 Introduction. This chapter provides background information about the document and explains what affordable housing is.
7. 2 Types of affordable housing. This chapter explains the different types of affordable housing that are available.
8. 3 Identifying an appropriate mix of affordable housing. This chapter explains how developers should provide an appropriate mix of different types of affordable housing on each site.

9. 4 Section 106 Agreements. This chapter explains the role of section 106 agreements in delivering affordable housing.
10. 5 Financial contributions. This chapter provides an overview of how financial contributions towards affordable housing are being calculated. This includes the way in which commuted sums are calculated and spent.
11. 6 Exception sites. This chapter explains that exceptions sites are ones where housing development would not normally be permitted but that development may be acceptable where it delivers affordable housing. This chapter includes the policy background to exceptions sites, an explanation of where exceptions sites should be located, the housing mix included in exceptions sites and the delivery of exceptions sites.
12. 7 Design. This chapter states that good design is an important part of meeting the policy aspirations of the two Local Plans. It provides a definition of good design and makes the point that good design should be applicable to all housing, regardless of type or tenure. Other issues include housing density, types and sizes of housing, housing for people with a disability, distribution of affordable homes, sustainable construction and housing in the countryside.
13. 8 Local housing need assessments. This chapter explains the role of housing needs assessments. This includes data and information sources and applying the results.
14. 9 Viability assessments. This chapter provides an overview of the role of viability assessments, including the policy background and cross refers to the guidance contained in the Local Plans.
15. 10 Vacant buildings credit. This chapter explains the vacant building credit, including the policy background and how it should be applied. This includes an explanation of how CIL charges would be levied on a vacant building.
16. 11 Community infrastructure levy. This chapter provides an overview of the Community Infrastructure Levy (CIL), which is a tariff levied on development that contributes towards infrastructure costs. It explains that affordable housing can be exempt from CIL charges.
17. 12 Making an application. This chapter provides an overview of the planning application process as it applies to affordable housing.

18. The Affordable Housing SPD will help to implement policies contained in the Suffolk Coastal and Waveney Local Plans, both of which have been subject to an Equality Impact Assessment screening. The following Local Plan policies will be implemented by the Affordable Housing SPD:

Suffolk Coastal Local Plan

SCLP5.10: Affordable Housing on Residential Developments

SCLP5.11: Affordable Housing on Exception Sites

Waveney Local Plan

WLP8.2: Affordable Housing

WLP8.6: Affordable Housing in the Countryside

19. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects the pockets of deprivation that exist across East Suffolk.

Screening of impact on different groups

	Groups	Likely Impact (positive/negative/no impact)	Reason for your decision
a	Age (Includes safeguarding issues)	Positive	The Affordable Housing SPD includes guidance on the provision of affordable housing that is designed for older people or to be modified for older people. This will benefit this age group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by

			post, if needed. The consultation materials will be available to people of all ages and therefore will not discriminate in terms of age.
b	Disability	Positive	The Affordable Housing SPD includes guidance on the provision of affordable housing for people with a disability. This will benefit this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those with a disability.
C	Gender reassignment	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those who have undergone gender reassignment.

D	Marriage and Civil Partnership	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. This consultation will therefore not discriminate against those who are married or in a civil partnership.
E	Pregnancy and maternity	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those who are pregnant or on maternity leave.
F	Race	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries

			and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against people from any racial background.
G	Religion or Belief	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against people from different religious beliefs.
H	Sex	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending

			hard copies by post, if needed. The consultation will therefore not discriminate against those of different sexual identities.
I	Sexual orientation	No impact	The Affordable Housing SPD provides guidance on the delivery of the affordable housing. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will therefore not discriminate against those of different sexual orientations.
J	Socio-economic deprivation	Positive	The Affordable Housing SPD includes guidance on the provision of affordable housing. This will benefit those who are experiencing socio-economic deprivation. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material for those unable to access the documents in the ways set out above. This may involve sending hard copies by post, if needed. The consultation will be therefore not against those who are experiencing socio-economic deprivation.

Consultation and Engagement

During the preparation of the Affordable Housing Supplementary Planning Document there have been regular steering group meetings with colleagues in East Suffolk Council including Planning Policy, Housing, Development Management and CIL/Section 106.

The following organisations and groups were consulted as part of the initial consultation:

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

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

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

The consultation was advertised on the Council's website, as well as on social media. A questionnaire, providing some background to the consultation and asking a series of questions, was published on the Council's website. Town and parish councils, elected members and other organisations referred to above were notified directly by email or post.

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

In total 22 individuals and organisations responded to the consultation. Between them they made 194 comments.

A second public consultation will take place from 1st November to 13th December 2021 on the Draft Affordable Housing SPD. This Affordable Housing SPD consultation will be held at the same time as the Sustainable Construction SPD and Walking and Cycling Strategy consultations (note the consultation on the Cycling and Walking Strategy has a later end date of 10th January). Consultation letters and emails covering all three consultations will be sent to consultees on the Council's planning policy mailing list. Posters and press releases covering all three consultations will take place, and information will be contained

in the Council's Planning and Building Control Newsletter. The planning policy mailing list includes Town and Parish Councils, Suffolk County Council, East Suffolk Councillors, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic societies, infrastructure providers), and members of the public.

Hard copies of consultation documents will be available online, in libraries and in the Council's customer service centres. Due to the ongoing Covid-19 pandemic, contact details have been provided in publicity material along with an offer of assistance in accessing the consultation material, should anyone be unable to view the documents in any of the ways set out above.

In view of the ongoing Covid-19 pandemic, the Council has set out measures to enable safe participation in the consultation and to ensure that those who wish to engage in the consultation are not disadvantaged. For those unable to view the consultation documents online, in libraries or in the Customer Service Centres, hard copies will be made available on request (free of charge) by post. In view of these measures the Council does not consider that this consultation will disadvantage any of the groups covered by this EQIA screening exercise.

Presentation in Different Languages

As part of a six-week period of formal consultation, the document will be published on the Council's website, with hard copies available on request for those unable to access it online. The document may be requested in a different language. When such requests are received the Customer Services Team will be involved with ensuring this request is actioned.

Proposed Changes

The Council will analyse responses received during the public consultation and will make any appropriate changes as a result of comments received.

Conclusion

This EQIA screening exercise shows that the Affordable Housing SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.



CABINET

Tuesday, 03 May 2022

Subject	HRA Fire Safety Strategy
Report by	Councillor Richard Kerry, Cabinet Member with responsibility for Housing
Supporting Officer	Heather Tucker Head of Housing heather.tucker@eastsuffolk.gov.uk 01502 523144

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

Purpose and high-level overview

Purpose of Report:

This report and the attached Fire Safety Strategy have been developed to set out the way East Suffolk Council's Landlord Services aim to minimise the risk of fires starting and spreading in Housing Revenue Account (HRA) owned and managed properties and how the service will safeguard residents, staff, contractors and visitors in the event of fire.

Although Fire Safety has always been a key priority for the Landlords Service, this is the first formal Strategy, which has been developed and which sets out the Council's proposals to manage fire safety in accordance with best practice, legislation and other relevant internal policies, which enables the safe management of properties.

Options:

There are two options to be considered:

Option 1 - This would see the adoption of the Fire Safety Strategy, which would ensure a robust strategic direction is set to effectively manage the risk of fire spread in Housing Revenue Account properties. East Suffolk Council has committed to ensuring the Health and Safety of our residents is a priority. In order to minimise the risk posed by fire to tenants and to ensure the effective management of Fire Safety in our homes, it is recommended that the Fire Safety Strategy is approved and implemented without delay.

Option 2 – This would see the failure to adopt the Fire Safety Strategy. This would not be a recommended option as it does not set out the standards officers are expected to follow to effectively manage fire using a risk-based approach.

Recommendation/s:

- 1.1 That Cabinet approves the Fire Safety Strategy, attached as Appendix A, which will be implemented by officers immediately.
- 1.2 That Cabinet provides the Cabinet Member with responsibility for Housing, Head of Housing and the Housing, Health and Safety Board delegated authority to update the Strategy as required.
- 1.3 That Cabinet provides the Head of Housing and the Housing, Health and Safety Board delegated authority to develop all the required policies and procedures to support the implementation of this Fire Safety Strategy.

Corporate Impact Assessment

Governance:

The Housing Health and Safety Board (HHASB) is a strategic leadership forum representing the housing service at East Suffolk Council (ESC), which meets monthly.

The purpose of the HHASB is to ensure the efficient and effective planning, organisation, implementation, monitoring, audit and review of protective and preventative measures

for health, safety and welfare for its Residents and Housing Staff and all those affected by the undertakings of the Council.

This includes the strategic monitoring of compliance and ensuring properties meet all of the required standards set out in Legislation and / or Guidance.

The HHASB will regularly review all relevant policies and procedures, including the Fire Safety Strategy. Policy, Legislation and Good Practice can often recommend changes to Strategies, which the HHASB will review and update as required.

The HHASB will actively and robustly monitor the compliance across all of its c.4,500 housing stock, to ensure it meets and exceeds expected standards.

ESC policies and strategies that directly apply to the proposal:

The Housing Service is currently developing a number of new strategies and policies, which will align with the Fire Safety Strategy.

In the Fire Safety Strategy, there are a number of policies recommended for development and adoption. This programme of work will be implemented, following adoption of the Fire Safety Strategy.

Environmental:

There are no direct environmental impacts as a result of the adoption of this Fire Safety Strategy. However, we will take into consideration this strategy when considering environmental improvements to our properties.

Equalities and Diversity:

This Strategy will set out the Council's approach to all of its housing stock. The Strategy has been developed in accordance with relevant legislation, guidance and best practice.

The Strategy focusses on the building's safety, which will also ensure residents safety. Therefore, no Equality Impact Assessment is required.

Financial:

There are no direct financial implications from adopting this Fire Safety Strategy.

There is a legal requirement for us to carry out a risk-based approach to fire safety and there are costs involved with conducting Fire Risk Assessments and carrying out the actions, where issues are identified.

There is already a dedicated budget in place for this work, so no additional cost is expected.

Human Resources:

There are no issues, which require HR's involvement within this report and Strategy.

ICT:

There are no issues, which require IT's involvement with this report and Strategy.

Legal:

There are a number of guidance documents and legislation, which set out the steps we should take, as a landlord, to minimise the risk of fire spread in our homes and ensure residents are able to live safely.

These include:

- Regulatory Reform (Fire Safety) Order 2005

- Local Government Association Fire Safety in purpose-built blocks of flats
- National Fire Chiefs Council Specialised Housing Guidance
- Housing Act 2004 – Housing Health and Safety Rating system
- Fire Safety Act 2021
- PAS 9980:2022 Assessing the External Wall Fire Risk in Multi Occupied Residential Buildings
- PAS 8671 Standard for the Built Environment Competence Programme
- Proposed Building Safety Bill

Risk:

If we fail to have robust mechanisms in place to effectively manage the risk posed by fire, then we could be placing our residents, staff or assets at risk. Therefore, it is vital we adopt an appropriate strategy to enable us to manage these risks effectively.

External Consultees: None

Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>
P11	Making best use of and investing in our assets	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		

P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input checked="" type="checkbox"/>
How does this proposal support the priorities selected? East Suffolk Council has made a commitment that the Health and Safety of residents will be a priority. This Strategy will ensure that in relation to Fire Safety, their safety is prioritised and that our assets are effectively managed.			

Background and Justification for Recommendation

1 Background facts	
1.1	This Fire Safety Strategy applies to all residential properties under the management of East Suffolk Council's Housing Revenue Account (HRA), this includes Leasehold, General Needs and Retired Living Scheme properties and some properties used as Temporary Accommodation as defined under the s188 and s193(2) Housing Act 1996 for those owed a duty under Homelessness legislation.
1.2	This is the first Fire Safety Strategy for ESC Housing. Previously, officers have made decisions and set up work programmes to ensure fire safety is prioritised and managed, but it would benefit from an over-arching strategy, which sets out clear parameters for officers to follow. This reduces the risk of any key information being lost when officers leave the organisation.

2 Current position	
2.1	An in-depth three-month review of compliance, including Fire Safety was conducted October 2021 – January 2022.
2.2	The review identified that more robust mechanisms needed to be put in place to ensure we could evidence that we were compliant with the requirements set out in different legislations and guidance, including Fire Safety.
2.3	Following this, East Suffolk Council has made a self-referral to the Regulator of Social Housing for potential non-compliance with the Home Standard.
2.4	In January, ESC entered into a contract with a competent Fire Risk Assessment (FRA) company, who are currently conducting a programme of FRA's across any of our HRA properties, which have communal living areas in shared accommodation or communal stairwells. This includes Retired Living Schemes, General Needs Blocks of Flats and some dwelling we lease out including commercial units.
2.5	By the end of June 2022, all of the stock that is required to have an FRA completed, will have been carried out.
2.6	As part of this programme of FRA's, we have been able to develop an on-going work programme, which means properties will have another FRA either annually, bi-annually or every three years, depending on the risks identified. For example, a Retired Living Scheme would be considered a high-risk property due to the

	number of potentially vulnerable people living there, whereas a low-level general needs block of flats with a communal hallway may be assessed as low risk and only require an FRA every 3 years.
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3 How to address current situation

3.1	By implementing this Fire Safety Strategy, East Suffolk Council shall ensure, so far as is reasonably practicable, that fire safety management arrangements comply with The Management of Health and Safety at Work Regulations 1999, The Regulatory Reform (Fire Safety) Order 2005, Housing – Fire Safety Guidance - Local Authorities Coordinators of Regulatory Services (LACoRS) and other appropriate regulations.
3.2	Relevant Government guidance will be followed, for example the Local Government Association Fire Safety in Purpose-built blocks of flats (2011), and the National Fire Chiefs Council Fire Safety in Specialised Housing which is applicable to Retirement Living Schemes.
3.3	<p>The purpose of this Fire Safety Strategy is to ensure the Council's primary focus is on the life, safety and welfare of our residents and staff and to ensure the council's assets are protected from the spread of fire and interruption of business and protect the general public.</p> <p>It will also ensure we meet our legislative duties as landlord and 'responsible person' and ensure that suitable resources are in place to prevent the cause and spread of fire and if/when they occur to minimise their impact within communal areas and individual properties.</p>

4 Reason/s for recommendation

4.1	This Fire Safety Strategy will set the Strategic Direction, which will ensure relevant policies and procedures can be developed which align to this Strategy and enable the Council to effectively manage the HRA stock, which will ensure residents are able to remain living safely in their homes.
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Appendices

Appendices:

Appendix A	Draft Fire Safety Strategy
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Background reference papers:

None



Fire Safety Strategy

May 2022

Author: Heather Tucker | Head of Housing

Version: Draft for Approval by Cabinet

Review: May 2024 (or sooner if policy or legislation changes require)

1. Introduction

- 1.1 This Strategy outlines the way East Suffolk Council's (the Council) Landlord Services will minimise the risk of fires starting and spreading in Housing Revenue Account owned and managed properties and how the service will safeguard residents, staff, contractors and visitors in the event of fire.
- 1.2 The Council will ensure that it manages fire safety in accordance with best practice, legislation and other relevant internal policies relating to the safe management of properties.

2 Purpose

- 2.1 The purpose of this strategy is to:
 - 2.1.1 Ensure the Council's primary focus is on the life, safety and welfare of our residents and staff
 - 2.1.2 Ensure the council's assets are protected from the spread of fire and interruption of business and protect the general public
 - 2.1.3 Ensure we meet our legislative duties as landlord and 'responsible person'
 - 2.1.4 Ensure suitable resources are in place to prevent the cause and spread of fire and if/when they occur to minimise their impact within communal areas and individual properties.

3 Scope

- 3.1 This strategy applies to all residential properties under the management of East Suffolk Council's Housing Revenue Account (HRA), this includes Leasehold, General Needs and Retired Living Scheme properties and some properties used as Temporary Accommodation as defined under the s188 and s193(2) Housing Act 1996 for those owed a duty under Homelessness legislation.
- 3.2 East Suffolk Council shall ensure, so far as is reasonably practicable, that fire safety management arrangements comply with The Management of Health and Safety at Work Regulations 1999, The Regulatory Reform (Fire Safety) Order 2005, Housing – Fire Safety Guidance - Local Authorities Coordinators of Regulatory Services (LACoRS) and other appropriate regulations (Appendix A).
- 3.3 Relevant Government guidance will be followed, for example the Local Government Association Fire Safety in Purpose-built blocks of flats (2011), and the National Fire Chiefs Council Fire Safety in Specialised Housing which is applicable to Retirement Living Schemes.

- 3.4 East Suffolk Council is committed to the effective management of risk, and the prevention of any associated injury or ill health to tenants, staff, visitors, contractors, and any persons affected by the premises including Fire and Rescue personnel.

4 Legislation and Guidance

The following external legislation and guidance will be used to design and implement this strategy. The internal guidance will then be developed or updated in accordance with this Strategy.

4.1 External

- 4.1.1 Regulatory Reform (Fire Safety) Order 2005
- 4.1.2 Health and Safety at Work etc Act 1974
- 4.1.3 LGA Fire Safety in purpose-built blocks of flats
- 4.1.4 NFCC Specialised Housing Guidance
- 4.1.5 Housing Act 2004 – Housing Health and Safety Rating system
- 4.1.6 Equality Act 2010 – Equality Duty
- 4.1.7 Fire Safety Act 2021
- 4.1.8 PAS 9980:2022
- 4.1.9 PAS 8671 Standard for the Built Environment Competence Programme
- 4.1.10 Proposed Building Safety Bill
- 4.1.11 New code of practice for external wall fire risk assessment

4.2 Internal

- 4.2.1 Tenants Handbook and Repairs Charter
- 4.2.2 East Suffolk Council Tenancy Agreement(s)
- 4.2.3 HRA Management of Fire Risk in Communal Areas Policy
- 4.2.4 Mobility Scooter Policy
- 4.2.5 HRA Asset Management and Compliance Strategy
- 4.2.6 Fire Safety Information for Residents
- 4.2.7 Removal of Fire Hazards in Shared Areas Policy
- 4.2.8 Removal of Fire Hazards in Shared Areas Procedure
- 4.2.9 Removal of fire Hazards in Shared Areas Fire Safety Leaflet
- 4.2.10 Removal of Fire Hazards in Shared Areas Mobility Aids Guidance
- 4.2.11 Hoarding Policy
- 4.2.12 Hoarding Procedure
- 4.2.13 Smoke Free Policy
- 4.2.14 Smoke Free Procedure
- 4.2.15 Gas Safety Policy
- 4.2.16 Electrical Safety Policy
- 4.2.17 Void Standard
- 4.2.18 Adaptations Policy
- 4.2.19 Stay Put Policies

- 4.3 The government have made recent announcements around the Building Safety Bill on 20 January 2020 and Fire Safety Bill on 19 March 2020. This policy will be updated with any subsequent legislative changes.

5 Roles and Responsibilities

- 5.1 The Responsible Person – The Chief Executive of East Suffolk Council is the person with overall responsibility for fire safety issues in East Suffolk Council properties.
- 5.2 The Head of Housing has responsibility for the whole of the HRA Housing Stock and shall ensure the following are in place:
- 5.2.1 A Fire Safety Strategy (this document) is adopted and implemented
 - 5.2.2 That the Fire Safety Technical Standard is implemented
 - 5.2.3 That nominated appointed persons (see below) are available to undertake the statutory fire safety checks/ tests and the recording of all such actions as required in the Fire Safety Logbook/ Checklists for the building;
 - 5.2.4 That appointed persons receive training deemed necessary to ensure they are competent to carry out their duties with regard to fire safety;
 - 5.2.5 The correct implementation and monitoring of the fire safety management system for those buildings, including the Fire Risk Assessments and Weekly/ Monthly Fire Safety Checklist, and Evacuation Plans (where appropriate)
 - 5.2.6 That other Housing Service staff and contractors are trained and competent to carry out their duties with regard to fire safety
- 5.3 **The Competent Person:** The Maintenance Manager will act as the ‘competent person’, until the role a Building Safety and Compliance Manager is appointed, at which point they will become the ‘competent person’.
- 5.4 **Housing Managers:** Will be responsible for ensuring that this Strategy is known and acted upon by staff directly under their control. Fire safety can only be dealt with correctly when all stakeholders play their part, which includes tenants, housing services maintenance contractors and all Housing Services staff.
- 5.5 **The Fire Safety Management Plan** sets out detailed responsibilities for all Housing teams, it’s the Housing Managers’ responsibility to ensure their teams are compliant with these elements.
- 5.6 **Appointed Persons** will take ownership for the completion of relevant fire safety checks and management of the site, for which they are responsible.

- 5.7 **All Staff** shall ensure that they are aware of and follow recognised procedures for fire safety. They shall inform their manager or team leader of any concerns regarding fire safety and participate in fire safety training as agreed with their manager / team leader.

6 Fire Risk Assessments

- 6.1 The Housing Maintenance Service will implement a robust fire risk assessment-based regime, of communal areas and shared dwellings (excluding houses) that complies with relevant legislation and ensure relevant actions identified in those assessments are carried out to prevent future fires and protect against death and injury.
- 6.2 The Housing Service, so far as reasonably possible will ensure that routes to emergency exits from premises and the exits themselves are kept clear at all times. Residents should also ensure they do not leave items, which would impede emergency access routes.
- 6.3 Fire Risk Assessments will consider the structure of the premises for the spread of flames including fire resistance and compartmentation of fire between communal areas and residential accommodations.
- 6.4 East Suffolk Council housing properties are categorised as A, B, or C according to risk.
- 6.5 The properties, which require a Fire Risk Assessment are set out in Appendix B (This will be added in time for Cabinet!)
- 6.6 Risk is determined by examining the hazards and fire safety measures present on a particular site. Consideration is given to the complexity of the building (e.g. properties over 18m due to the number the storeys), the fire measures in place that require checking (e.g. alarm systems) and the profile of the residents (e.g. if there are a high number of residents with reduced mobility such as Retirement Living Schemes).
- 6.7 It must be remembered that categorisation remains fluid and can be changed due to the finding of an FRA itself or other changes to structure and occupancy.
- 6.8 Fire Risk Assessment Frequency:
- Category A – Annually
Category B – 2 Yearly
Category C – 3 Yearly
- 6.9 The review of the fire risk assessment will in most cases just require a simple assessment of the changes that have occurred to the building (if any), and how the building is used. If there have been no building changes, and the staffing working patterns and type of use has not changed then the FRA will remain fit for purpose. Where there are significant changes (to the building or occupant type), or if there is any reason to suspect that it is no longer valid it is likely that the completion of a new

FRA will be required. This will be organised by the current Housing Maintenance Manager until a new Building Safety and Compliance Manager is appointed.

- 6.10 The recommended actions identified in the fire risk assessment will be set out in an action plan listing physical and managerial measures necessary to ensure that fire risk is maintained at, or reduced to, an acceptable level.
- 6.11 The FRA will set out high, medium and low remedial actions with target completion times determined by the East Suffolk Council.
- 6.12 The recommended remedial works will be reviewed, actions raised, allocated and monitored, with evidence required by the Housing Maintenance Manager, and with the overview of the Housing Health and Safety Board.
- 6.13 We will use a dedicated system to monitor and track when FRA's are due, and all actions identified and whether they are complete. The system will provide a detailed audit trail, which enables us to clearly evidence where and when remedial works have taken place.
- 6.14 Any high or medium risk remedial works/ improvements detailed within the FRA remedial action plan relating to building structure, or detection and alarm systems will be implemented by the Housing Maintenance Team as part of a rolling programme of works.

7 Policy

Fire Management Plans

- 7.1 The Housing Service will establish and maintain plans as well as procedures to identify the potential for and responses to, fire incidents (including emergency situations) in order to prevent or mitigate the likely illness and injury that may be associated with fires.
- 7.2 The Council will prepare and publish a Fire Safety Management Plan for preventing or controlling the risk of fire within HRA properties for any sites with an increased risk of fire, including St Peters Court, Retirement Living Schemes and Temporary Accommodation Schemes, with communal areas.

Signage and Documentation

- 7.3 Directional signage for the fire and rescue service should be provided in blocks of flats with a top storey more than 11m above ground level, on each entrance to stairs and lifts.
- 7.4 Fire Safety notices are displayed in East Suffolk Council blocks, Retirement Living.
- 7.5 Schemes and Temporary Accommodation sites and Fire Exits are clearly signposted.

- 7.6 The Council will ensure that there is adequate illumination to communal, emergency escape routes.

Fire prevention works and surveys

- 7.7 In addition to carrying out Fire Assessment works, to keep homes safe, the Council will regularly carry out a range of works and surveys. These will be set out in the HRA Asset Maintenance and Compliance Strategy, which is currently being developed.
- 7.8 For blocks of flats over 11m and high risk buildings, we will arrange a Type 4 Fire Risk Assessment, which includes an intrusive inspection to confirm compartmentation and fire stopping.
- 7.9 The Void Standard includes consideration for means of escape, fire protection in the kitchen and will ensure a kitchen fire rated door is present or installed.

Tenants and Leaseholders

- 7.10 It is a Tenant's and Leaseholder's responsibility to be aware of possible fire hazards around their home and to take steps to protect their household from fire.
- 7.11 Fire safety awareness will be promoted to tenants and leaseholders using appropriate communication channels including but not exclusive to the Council website, Social Media, Tenants' Newsletters, information leaflets, and tenancy handbooks.
- 7.12 Housing Officers, Repairs and Maintenance Operatives and our contractors undertaking tenancy visits will report any unauthorised property alterations that may compromise fire safety and if remedial action is required, recharges for the tenant / leaseholder will be considered on a case-by-case basis. More information on recharges is set out in our Recharges Policy.
- 7.13 Tenants and leaseholders must request written permission from the Council before commencing any significant changes to their flat. Permission will not be granted if the fire integrity of the property is likely to be adversely affected. The reasons for refusal will be explained to the tenant / leaseholder, so they understand the risk posed by the alterations being carried out.
- 7.14 Tenants and Leaseholders are not permitted to BBQ in communal areas, such as communal walkways or balconies, or on private balconies and grassed areas.

Retirement Living Schemes

- 7.15 Every Retirement Living Scheme will have a specific Incident Management Plan that sets out the process in the event of a fire.

- 7.16 The Scheme Manager will be responsible for carrying out Health and Safety checks within the schemes including regularly testing scheme alarms such as pull cords and fire call points and recording these.
- 7.17 The Scheme Manager is responsible for ensuring residents are aware of the Incident Management Plan and if relevant, Stay Put Policy. This will be completed as part of the resident's scheme induction & at regular support review meetings.
- 7.18 Fire instructions are displayed on the inside of every resident's front door in each scheme and will be checked monthly by the Scheme Manager.
- 7.19 Each Scheme's Fire Risk Assessment is reviewed periodically by an external consultant. Resident's Personal Emergency Evacuation Plans (PEEPs) are reviewed regularly & if the resident's circumstances change.
- 7.20 The Scheme Manager will ensure Fire alarms are tested on a weekly basis, logged in the Fire Management Record Book and that residents and visitors will be pre-warned, before the test is undertaken.
- 7.21 Residents are not permitted to fit extra door locks or chains to their front door. In the event of an emergency, a Scheme Manager or emergency services may need to gain urgent access to the property. Adding additional locks to Fire Doors, may also compromise their integrity and reduce their effectiveness.
- 7.22 BBQ's are only permitted if a Scheme Manager is on site and a bucket of sand must be available, in the event of a fire.
- 7.23 A BBQ can be used if it is not gas and is a safe and reasonable distance away from the building.
- 7.24 Gas BBQ's are not permitted
- 7.25 BBQ's are not permitted if there is a planned Fire Strike.
- 7.26 The Scheme Manager ensures Health and Safety activities in relation to fire safety are carried out in line with the checklist detailed in the HRA Management of Fire Risk in Communal Areas Policy

Mobility Scooters

- 7.27 Council does not permit Mobility Scooters to be stored on site in communal areas.
- 7.28 Mobility Scooters are considered a health and safety risk and fire hazard in terms of either blocking or reducing the means of escape in the event of a fire or the scooters themselves causing the fire.

- 7.29 Suitable storage is provided for Mobility Scooters, in external stores. More information can be found in the Mobility Scooter Policy.

Storing goods in communal areas

- 7.30 The Council does not permit storage of any items in communal areas, they can increase the likelihood of fire spreading and hinder evacuation if required in the event of an emergency.

8 Housing Health and Safety Board

- 8.1 The Housing Health and Safety Board will monitor the effectiveness of this policy and in addition will seek residents' views, using the Tenant Involvement Framework.
- 8.2 The following comes under the remit of the Housing Health and Safety Board:
- 8.2.1 Review East Suffolk Council Fire Safety Strategy to ensure fit for purpose and future proofed
 - 8.2.2 Review the policies which are part of the Fire Safety Strategy
 - 8.2.3. Monitor progress of tasks on the Action Plan
 - 8.2.4 Monitor progress with FRA remedial works
 - 8.2.5 Identify funding/budget implications
 - 8.2.6 Monitor performance against the KPIs
 - 8.2.7 Delivery of the Resident Engagement Strategy elements related to Fire Safety
 - 8.2.8 Monitor fire related complaints
 - 8.2.9 Ensure competency/training standards are met

9 Monitoring, review and evaluation

- 9.1 This policy will be reviewed every 2 years or in line with legislative or regulatory changes.
- 9.2 Current Published Version: TBC
- 9.3 Next Review Due: TBC

Appendix A - Relevant Legislation, Regulation and Guidance

Regulatory Reform (Fire Safety Order) 2005

The main regulatory legislation which sets standards for the control measures to be taken for fire safety, including the need for all workplaces to have Fire Risk Assessments undertaken.

General measures include:

- a) Reduce the risk of fire occurring on the premises and the risk of fire spread
- b) Measures in relation to the means of escape from the premises
- c) Measures for assuring that, at all material times, the means of escape can be safely and effectively used
- d) Measures in relation to the means of fighting fires
- e) Measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises
- f) Instruction and training of employees and providing tenants with relevant information.

The Regulatory Reform (Fire Safety) Order 2005 came into effect 1st October 2006 and is enforced by the Suffolk Fire and Rescue Service (SFRS). The key actions of this Order are detailed below. This Order replaced all previous fire legislation, and gives Suffolk Fire and Rescue Service powers to visit and inspect for fire safety issues within any of East Suffolk Councils Housing Services schemes as part of normal routine, or where there is believed to be just cause, i.e. via a formal Complaint.

The key actions under the Regulatory Reform (Fire Safety) Order 2005 are:

- a) A Fire Risk Assessment is required for each place of work, with an action plan to manage any deficiencies/ recommendations identified by the assessment, undertaken by a 'competent' Fire Risk Assessor. As a Social Landlord East Suffolk Council is required to undertake a Fire Risk Assessment covering the communal areas of a property, and consider who may be harmed by a fire
- b) Fire Risk Assessments are reviewed regularly and revised when significant operational or property changes have occurred
- c) The appointed Fire Risk Assessor should have their competency assessed against relevant national standards (Ref. Fire Risk Assessment Competency Council: Guide to Choosing a Competent Fire Risk Assessor 29th April 2014)
- d) The 'Responsible Person' shall ensure there is an Appointed Person for each supported/ sheltered scheme site, and given suitable training and instruction, and sufficient time for the role
- e) Fire Awareness training is required for all staff, TBC.
- f) Additional fire extinguisher training will be provided as necessary
- g) Firefighting equipment, smoke/ heat detection and alarm systems must be tested and maintained
- h) An Evacuation Plan will be in place for relevant sites e.g., extra care schemes

- i) In house Fire Safety checks and monitoring should be detailed in the Fire Safety Logbook, via the Weekly/ Monthly Fire Safety Checklist. Items of non-compliance should be raised up the management chain for resolution

The Housing Act 2004

Part 1 – The Housing Health and Safety Rating System (HHSRS). There are 29 categories of potential hazard considered and number 24 is fire.

The HHSRS is the principal tool for assessing fire safety risk and regulating standards in all types and tenures of residential accommodation.

The underlying principle of the HHSRS is that any residential premises should provide a safe and healthy environment for any potential occupier or visitor.

The HHSRS provides a mean of assessing dwellings which reflects the risk from any hazard and allows a judgement to be made as to whether that risk, in those particular circumstances, is acceptable or not.

For these purposes, for example, it would consider the likelihood of an uncontrolled fire (and associated smoke) and the severity of the outcome (e.g. illness; injury; death; etc.).

The enforcing authority for the Housing Act 2004 is the local housing authority.

National Fire Chiefs Council (NFCC) - Fire Safety in Specialised Housing – May 2017

This guidance applies to Retired Living Schemes.

Regulations

Building Regulations

Guidance on compliance with Building regulations Part B: Fire Safety is given in Approved Document B 2010, 2019 edition. Functional requirements:

- a) Means of warning and escape
- b) Internal fire spread (linings)
- c) Internal fire spread (structure)
- d) External fire spread
- e) Access and facilities for the fire service

Furniture and Furnishings (Fire) (Safety) Regulations 2010

Electrical Equipment (Safety) Regulations 1994

Gas Safety (Installation and Use) Regulations 2018 (Landlord duties covered by regulation 36)

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 – apply from June 2020 to private rented tenures

Guidance, Standards and Codes – Including:

- Fire Safety in Purpose built blocks of flats – LGA – May 2012
- Housing – Fire Safety: Guidance on fire safety provisions in certain types of existing housing - Local Authorities Coordinators of Regulatory Services (LACoRS), in partnership with the Chief Fire Officers
- Association and the Chartered Institute of Environmental Health – July 2008

Recent Government Announcements

Fire Safety Bill – 19 March 2020

The bill will amend the Fire Safety Order 2005 to clarify that the responsible person or duty-holder for multi-occupied, residential buildings must manage and reduce the risk of fire for:

- The structure and external walls of the building, including cladding,
- balconies and windows
- Entrance doors to individual flats that open into common parts This clarification will empower fire and rescue services to take enforcement action and hold building owners to account if they are not compliant.
- The bill will provide a foundation for secondary legislation to take forward recommendations from the Grenfell Tower Inquiry phase one report, which stated that building owners and managers of high-rise and multi-occupied residential buildings should be responsible for a number of areas including:
- Regular inspections of lifts and the reporting of results to the local fire and rescue services
- Ensuring evacuation plans are reviewed and regularly updated and personal evacuation plans are in place for residents whose ability to evacuate may be compromised
- Ensuring fire safety instructions are provided to residents in a form that they can reasonably be expected to understand
- Ensuring individual flat entrance doors, where the external walls of the building have unsafe cladding, comply with current standards

Building Safety Bill - 20 January 2020

Provides clearer accountability and stronger duties on those responsible for high rise buildings. Measures include:

- New Building Safety Regulator within the Health and Safety Executive
- Clarified and consolidated advice for building owners, proposal to extend cladding ban, update on fire sprinklers



CABINET

Tuesday, 03 May 2022

Subject	Community Housing Fund Spend Policy
Report by	Councillor Richard Kerry, Cabinet Member with responsibility for Housing
Supporting Officer	Stephanie Baxter Housing Strategy and Enabling Manager Stephanie.baxter@eastsoffolk.gov.uk 01502 523462

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

Purpose and high-level overview

Purpose of Report:

The Community Housing Fund (CHF) Spend Policy provides a clear framework of the level of funding available, who can bid for it and how it is to be used. The CHF Spend Policy has been designed to ensure that a fair process for allocating funding, which will try and support as many Community Led Housing Schemes as possible.

Options:

There are two main options to consider. Firstly, we could continue 'as is', but this means there would be no policy in place and would prevent money being allocated in a fair and proportionate way to multiple CLH's and instead could be allocated purely on a first come first served basis. Alternatively, the second option would be to adopt this CHF Spend Policy, which provides a transparent and clear framework for the disposal of the grant to eligible applicants for ESC, Community Led Housing Groups and government.

A fair and transparent policy would ensure robust decisions are made and an equal consideration is given to all applications.

Recommendation/s:

1.1 That the Community Housing Spend Policy, as set out in Appendix A, is adopted.

1.2 That delegated responsibility is given to the Head of Housing in consultation with the Cabinet Member for Housing to award the Community Housing Fund (CHF) spend policy.

Corporate Impact Assessment

Governance:

Applications for funding will be agreed by the Housing and Enabling Manager, Head of Housing, Strategic Director with responsibility for Housing, and the Housing Cabinet Holder.

ESC policies and strategies that directly apply to the proposal:

The Community Housing Fund Spend Policy is closely linked with the Housing Enabling Strategy and the Housing Strategy. Both of these Strategies identify the benefits of supporting Community Led Housing.

Environmental:

There have been examples throughout the UK where CLH groups have delivered high energy efficient, low carbon schemes. These are exemplars based on sustainable principles. Through our work with CLH's, we will be encouraging the use of sustainable construction methods and energy efficient homes.

Equalities and Diversity:

The Equalities Impact Assessment is not required.

Access to the CHF grant is open to all groups and support can be given by Officers to groups who do not have experience of funding applications.
Financial: There are no additional costs to the Council. The CHF is a ring-fenced grant from government that the Council can distribute to deliver additional affordable housing.
Human Resources: There are no impacts.
ICT: Applications will be via writeable PDF's and then emailed to appropriate officer.
Legal: All grant agreements will form a legal agreement, which will be set out with the guidance of our in house legal team.
Risk: All decisions will be made in line with the policy and set out in a legal agreement. All funding decisions will be made once the Council has assurance that the CLH Group can afford to deliver their plans. This will reduce the risk of funding being awarded but a scheme not being deliverable.

External Consultees:	N/A
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Strategic Plan Priorities

Select the priorities of the Strategic Plan which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondary priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P02	Attract and stimulate inward investment	<input type="checkbox"/>	<input type="checkbox"/>
P03	Maximise and grow the unique selling points of East Suffolk	<input type="checkbox"/>	<input type="checkbox"/>
P04	Business partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P05	Support and deliver infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T02	Enabling our Communities		
P06	Community Partnerships	<input type="checkbox"/>	<input type="checkbox"/>
P07	Taking positive action on what matters most	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P08	Maximising health, well-being and safety in our District	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" type="checkbox"/>
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services	<input type="checkbox"/>	<input type="checkbox"/>

P11	Making best use of and investing in our assets	<input type="checkbox"/>	<input type="checkbox"/>
P12	Being commercially astute	<input type="checkbox"/>	<input type="checkbox"/>
P13	Optimising our financial investments and grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P14	Review service delivery with partners	<input type="checkbox"/>	<input type="checkbox"/>
T04	Delivering Digital Transformation		
P15	Digital by default	<input type="checkbox"/>	<input type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input type="checkbox"/>
P19	District-wide digital infrastructure	<input type="checkbox"/>	<input type="checkbox"/>
T05	Caring for our Environment		
P20	Lead by example	<input type="checkbox"/>	<input type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
XXX	Governance		
XXX	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<p>How does this proposal support the priorities selected?</p> <p>Priority 7.</p> <p>This priority delivers targeted, place-based initiatives to support life chances and reduce deprivation. This Community Housing Fund supports communities to enable or commission additional affordable housing in their areas that meet specific needs.</p> <p>Priority 8.</p> <p>Secure, high quality, affordable housing provides a stable base on which residents can flourish and remain healthy. The medium of housing acts as a catalyst to bring the wider community together, enabling them to learn from each other as well as new skills. It also changes derelict land into a positive place, reducing anti-social behaviour.</p> <p>Priority 9.</p> <p>Communities are brought together to support or lead on a housing project and can be a mechanism for inclusion and growth in life skills.</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	The Council received £2,209,957 from the Community Housing Fund in 2016 to help communities mitigate against the pressures caused by second and holiday accommodation.
1.2	To date, £752,375 has been spent to deliver 9 homes in Southwold and Bawdsey through supporting SouthGen and Peninsula Villages CLH groups.

1.3	To support the objectives of the Housing Enabling Strategy, (increasing the number of additional homes delivered via CLH models), a CHF spending policy is required. This will act as a tool to promote the model and engage with local communities and Parish Councils. Such a policy highlights the funding available, the support the Council is able to offer and how interested parties can apply for funding.
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2 Current position

2.1	Two CHF groups, PVCLT and SouthGen have received funding to deliver additional affordable housing. However, there is no current policy on how the funding should be used, which may cause confusion for local communities and Members alike.
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3 How to address current situation

3.1	A clear spending policy outlines the financial and practical support the Council can provide.
3.2	It also sets out the Councils requirements of CLH groups to be professional in outlook, governance and financial management.

4 Reason/s for recommendation

4.1	Transparency on how ESC utilises CHF grant within the frameworks of the Strategic Plan and Housing and Enabling Strategies
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Appendices

Appendices:

Appendix A	CHF Spending Policy
Appendix B	CHF letter from MHCLG, Dec 2016

Background reference papers:

None

Community Led Housing Fund Spend Policy 20.04.2022

1. Community Led Housing

Community Led Housing (CLH) is an umbrella term encompassing several non-profit models of housing delivery through localised organisations that have strong governance frameworks supported or instigated by local residents.

There are a range of ownership, management and occupancy models including, Community Land Trusts, Cooperative Housing Societies or Cohousing¹. These models can deliver a range of tenures for rent and ownership linked to local incomes. These are delivered by non-profit organisations with legal mechanisms (asset locks) that enable the land, homes and other community assets to be held and protected in perpetuity².

Community led housing has the following definitions: -

1. The local community must be integrally involved throughout the process in key decisions (what, where or who). They don't necessarily have to initiate and manage the development process or build the homes themselves, though some may do.
2. A presumption in favour that community groups will take a long-term formal role in either ownership, management, or stewardship of the homes; and
3. That the homes benefit the local area and /or a specified community with defined and legal protections in perpetuity.

Community Housing Fund

The Community Housing Fund, (2016) was funding from government (DCLG) to help communities mitigate against the economic market pressures of second and holiday homes. The Council received £2,209,957 in December 2016. A total of £752,375 has been spent by the Council to support local community led housing groups deliver homes for local residents across the district. This document sets out how the remaining funds will be spent across the district.

Aim of fund

The Council seeks to use this fund to deliver *additional* affordable housing in perpetuity, as well as enabling empty homes or buildings to be brought back into use for the community³.

The Council will allocate funding to:-

- i. Provide technical and enabling support
- ii. Provide revenue funding

¹ Cohousing is a hybrid model that can deliver affordable housing but its objectives are to deliver schemes based on shared values.

² This includes exemptions to the Right to Buy for CLTs and Cooperative homes.

³ To meet local housing need as affordable rented homes for upto 5 years, with management by an RP.

iii. Provide capital funding

The Council's overall strategy is to allocate the remaining £1,314,805 as grants or repayable loans to assist CLH groups in the following ways:

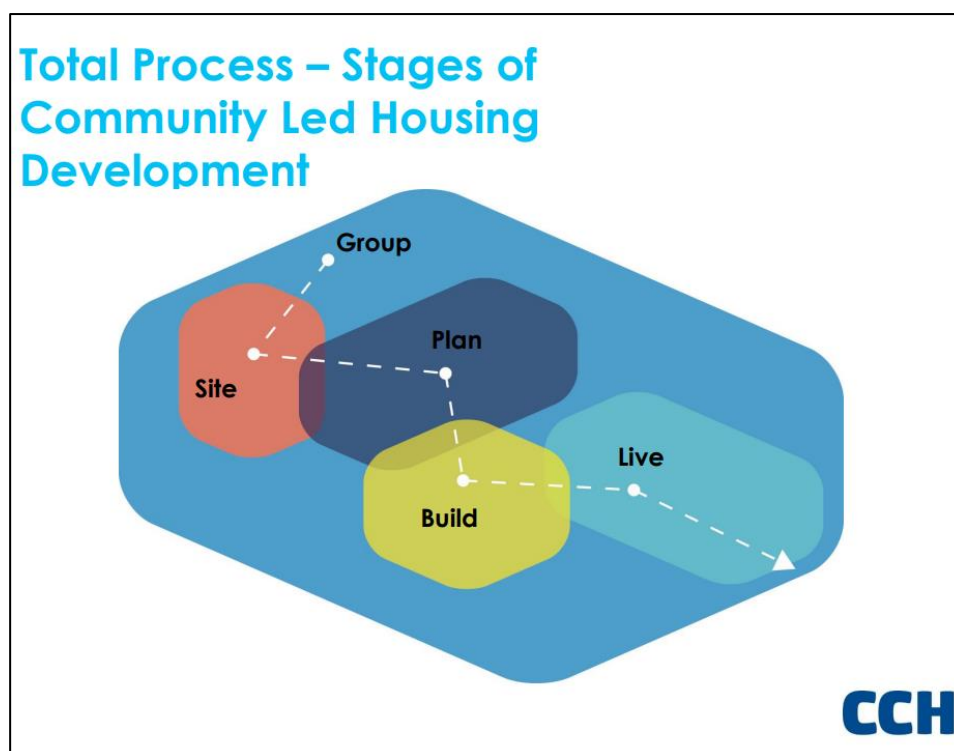
1. £262,961 (20%) will be reserved for technical support to assist communities reach the 'group stage':-
 - i. ESC Officer training and networking contracts (i.e. Eastern Community Homes, National Community Land Trust Network etc) .
 - ii. Enable technical support to local CLH groups to access policy guidance, deliver community engagement events or access funding.
2. £657,403 (50%) revenue funding to enable CLH groups to reach the plan and site stages:-
 - i. Complete legal incorporation
 - ii. Reach planning permission. Funding to attain planning permission will be allocated as a **repayable loan**, payable in full upon completion of the whole scheme. It will be converted to grant if planning permission is not awarded.
3. £394,441 (30%) will be allocated to provide capital funding, (up to 50% of total development costs), to help CLH groups reach the build and live stages, for the delivery of additional affordable housing development across the district. Funding for S106 properties will not be supported⁴.

From project inception to residents moving into their new homes, the process of delivering Community Led Homes has 5 overarching milestones,⁵ these are reflected throughout the allocation of funding.

⁴ This is to protect limited resources and prevent direct competition between Registered Providers and CLH groups.

⁵ See for details <https://www.cch.coop/wp-content/uploads/2020/08/b1-development-process.pdf>

Figure 1 Development Process



Source: Confederation Cooperative Housing (2018)

2. Who can access funding?

The Council will only allocate funding to community led housing groups who meet the definition in section 1 who will:

- i. Deliver **additional** affordable housing and it is the main objective of their scheme. The cost of new homes will be at least 50% of total cost of project. Some open market will be allowed to cross subsidise the scheme.
- ii. Protect homes and community assets in perpetuity through 'asset lock' in governance framework.

Community led housing organisations.

The allocated funding will be used to support community led housing schemes, including the following organisation types.

Community groups who are based in the area of the development and representative of the local community. Such groups will need to be legally constituted organisations to receive this funding. These may be an existing charitable or development trust, or a non-profit organisation set up specifically to meet a local housing need.

Registered Providers

Funding will be granted to **non-profit** Registered Providers (RP's) who are seeking to work with a local community group on a specific housing scheme. A signed formal funding

agreement between the Council and the RP would be required. The list of RP's operating within East Suffolk can be found [here](#).

Funding from the Community Led Housing Fund can be used alongside other funding streams including Homes England⁶ [Affordable Homes Programme 2021-2026](#) .The Council would expect to see evidence of partnership working between an RP and CLH group via a legal contract prior to any funds being transferred. Registered providers offer a wealth of experience and support and can help community groups in two ways.

- i. Provide guidance and technical expertise during the inception of a project
- ii. Design and build the scheme in partnership with the community led housing group, keeping them involved in key decisions.
- iii. Managing the homes once delivered in partnership with the community led housing group.

Development partners

These may include other specialist or technical organisations who can access or receive funding on behalf of the Community Led Housing group. Such organisations would need to meet the following criteria prior to receiving funding from the Council.

- i. Demonstration of strong governance arrangements by operating through open and accountable, cooperative processes, with strong performance and management systems.
- ii. Demonstrate clear, realistic financial plans for the management and development of the housing scheme where applicable
- iii. Demonstrate clear, realistic financial plans for the management and development of the housing scheme where applicable
- iv. Demonstrate community support for the proposals
- v. Be clear about how the organisation will comply with any relevant legislation and statutory requirements
- vi. Sign a funding agreement with evidence of how they meet the above criteria.
- vii. Sign a nominations agreement, protecting the homes for local residents to the Parish.

Community led housing group – governance requirements: -

- i. A legal entity or be part of a legally constituted consortia agreement.
- ii. Be appropriately constituted (examples might include; a registered charity, a community interest company or charitable incorporated organisation, non-profit company, Community Benefit Society or Industrial and Provident Society)
- iii. Have stated community benefit objectives

⁶ Homes England is a non-departmental public body who manage and allocate affordable housing fund.

- iv. Be non-profit, distributing any surpluses back into the organisation to further its social aims/community benefits

Criteria for funding

Priority will be given to schemes that meet the following criteria. See [Environmental Guidance Note](#) for guidance on measures to help meet reduced or zero carbon emissions.

- i. High energy efficient homes above building standards
- ii. High energy efficient homes above building standards and at National Described Space Standards.
- iii. High energy efficient homes above building standards and at National Described Space Standards with reduced or zero carbon emissions.

3. What can the funds be used for?

The funding can be used for the following: -

Community Development and engagement work (Group stage)

Funding to support community engagement and development. This includes the following: -

- i. Start-up guidance and workshops based on ideas, outcomes and objectives.
- ii. Fees for legal incorporation and governance framework.
- iii. Guidance on appropriate legal model from accredited legal and policy advisors.
- iv. Identifying skills and training needs of the community group
- v. Identifying other funding streams and assistance with bid writing
- vi. Business development and long-term support for the group.
- vii. Specialist support, i.e., green or digital technology

Initial Feasibility Work (Plan and Site stages)

This includes works to ensure the feasibility and viability of the project. Specific tasks include:-

- i. Feasibility study, including local housing needs survey
- ii. Commissioning planning or development professionals to assist with taking project to planning permission milestone, (including RP's)
- iii. Site assessment and appraisals
- iv. Project planning, including business plan, funding opportunities and bid writing.
- v. Securing advice via a pre planning application decision
- vi. Detailed schemes and plans to secure (full) planning permission.⁷
- vii. Survey and site and reports in preparation for the planning application.
- viii. Identification of site-specific costs or abnormalities such as contamination or tree protection orders.
- ix. Communication events/materials/platforms to wider community.

Project Management Costs. (Site stage)

⁷ A Full planning application gives the community confidence as all aspects of the project are detailed. A decision would be made at planning committee.

These include costs associated with a specific site prior to work commencing on the site. It could include the following:

- i. Professional design fees such as architect, quantity surveyor, archaeology or other site investigations as required as part of the planning permission.
- ii. Planning advice fees
- iii. Legal advice fees
- iv. Procurement costs
- v. Site management fees
- vi. Land acquisition
- vii. Additional costs for contamination or site clearance and security, etc

Construction costs (Site stage): All fees associated with delivering the project. This will include any off-site works.

Other costs: The Council will consider, where evidence is provided, to assist with funding to enable a project to be viable. The Head of Housing, Housing Portfolio Holder and Strategic Director will make these decisions.

Items the fund will not cover.

The Community Housing Fund will not be used for the following:-

- i. Housing developments that do not meet the basic principles for community led housing as stated above.
- ii. Any organisation that does not include an asset lock or meets the listed criteria as above.
- iii. Housing development that has already been started.
- iv. Costs that the CLH has incurred retrospectively. All costs and estimates must be agreed prior with evidence⁸.

4. How much Community Housing Fund can CLH apply for?

Stage 1: Community Development/Set up fund: Each community can apply for a grant of up to £5000 to support the CLH groups development. For groups who are not yet constituted, the Council will hold the funding and pay fees for start-up and legal costs. Groups that are legally constituted will receive the funding direct. Funding for such start-up costs will be allocated out of the revenue pot of £657,402

Stage 2: Feasibility Fund: Funding of up to £40,000 per community group will be provided to enable initial feasibility works to be completed. Funding for such costs will be allocated out of the capital pot of £394,441

⁸ Evidence of fees should include quotes from qualified professionals. CLH groups are responsible for their own due diligence, governance and project management.

Depending on the amount agreed, funding for feasibility works will only be granted to RP's or other community organisations or development partners whose organisational and financial capacity meets the Councils procurement requirements.

Groups will be required to raise match funding of 20% from other sources. This is to demonstrate that groups have the organisational skills to raise funding from other sources. This will give the local community confidence in the group's skills, knowledge and commitment. It will also provide the local community an opportunity to be directly involved in the project as well as raise funding for other objectives such as work or growing space.

Stage 3: Development Fund: Up to 50% of total capital and project management costs will be provided and awarded directly to Registered Providers, other development partners or community organisations. Such organisations should meet the Councils' procurement criteria on financial and organisational processes. Additional funding can be secured from Homes England, grants, mortgage or community shares⁹.

Community Housing Fund will only be granted up to 50% of the total project cost. Therefore, CLH groups are required to seek additional funding from other sources or enter into a partnership with an RP, or a quantified development or community organisation who have been approved by the Council. Community groups may seek other funding streams as below.

Loans. Loans can be taken against existing assets which will act as collateral. Long term loans from private or charitable sources could be repaid via the rental income from housing. Registered Providers take this approach, usually with grant from Homes England. For Community Led Housing Groups working in partnership with a Registered Provider, this is a lower risk option, especially if the RP is acting as the development partner.

Grants. Community Led Housing Groups can access grant funding streams not available to RP's or local authorities. A list of funders can be found [here](#). Advice on accessing grants and bid writing is available from East Suffolk Councils Housing Enabling Team or technical advisors¹⁰.

Value for money.

Applications for funding must show they provide value for money for the quality they are providing via evidenced quotes from qualified professionals.

Application process: Interested groups are encouraged to meet with the Councils Housing Enabling Team to discuss their ideas and desired objectives.

Grants: CLH groups will be required to complete an application form. The decision process will be as follows: -

⁹ Only Community Benefit Societies can raise community shares.

¹⁰ Organisations such as Locality, Community Action Suffolk, Eastern Community Homes, National Community Land Trust or Community Led Housing can assist.

Stage 1. Community development/start-up costs of up to £5,000 will be decided by the Housing Enabling Manager and Head of Housing, Housing Portfolio Holder, and Strategic Director

Stage 2. Feasibility funding will be decided by Housing Enabling Manager, Head of Housing and Housing Portfolio holder and Strategic Director.

The outcomes of the feasibility report will guide whether the project can proceed in its current form. A full copy would be required to enable the Council to decide whether to continue supporting the project further.

Stage 3 funding. Access to funding for the development of the project will require a more detailed analysis of the following, with evidence of how the community group has followed due diligent practices, to ensure the project is: -

- i. Deliverable
- ii. Value for money (not inflated costs)
- iii. How the project meets the criteria in sections 1 and 3.
- iv. An allocations policy¹¹ (to be negotiated and documented via a nominations agreement)
- v. A signed agreement with Gateway to Homechoice to enable all affordable rented homes to be advertised on the system.
- vi. Future scheme management and maintenance programmes (a full repairs framework would be prudent)
- vii. Business model and financial viability appraisal
- viii. Evidence of funds raised from external sources

A more detailed development appraisal form will be required at this stage in conjunction with the community groups development partner, RP, planning agent or technical advisor.

This will be assessed by the Councils Housing Enabling Team, Development Manager, Head of Housing, Housing Portfolio Holder and Strategic Director.

5. Payment of grant

Stage 1. Community development start up fund: Payment of grant will be made on receipt of a grant claim form and invoices of work undertaken. Community Led Housing Groups who are not legally incorporated at this time, will have funds held by the Council and paid directly to invoiced third partners.

Stage 2. Feasibility Fund: Payment of grant will be made on receipt of a grant claim form and invoices of work undertaken.

Stage 3. Development Fund: Payments will be made in two stages:

- 50% to be paid on start of site providing the CLH group has other sources of funding

¹¹ Please note, receipt of this Fund will require ESC to have 100% nominations to affordable rented homes.

- 50% paid upon completion.

In the event community groups seek a one-off payment for site acquisition, site clearance or viability gap funding, payment will be made upon receipt of works completed.

Alternative arrangements will be agreed in writing for schemes that have cashflow issues, although CLH groups are expected to have sufficient finance to complete their project. Such agreements will be made by the Housing Enabling Team, Head of Housing, Housing Portfolio Holder and Strategic Director. Overspends: Additional funding for overspends will only be considered in exceptional circumstances that could not be foreseen, i.e., global pandemic, where all other options have been considered. The Head of Housing, Housing Portfolio Holder and Strategic Director will make such decisions.

6. Funding agreement

The council will require all recipients of grant or loans to sign a binding, non-negotiable funding agreement. Specific requirements will be made, including: -

Governance and due diligence: The Council will require evidence of relevant insurance and clear governance framework, which can be verified.

Monitoring arrangements: The Council requires quarterly reports with detailed financial spending (in spreadsheet format) send to the Housing Enabling Team on the 1st date of each quarter, (1st April, 1st July, 1st October, 1st January).

Grant usage and works to be completed: The agreement will set out clearly what the grant or loan is to be used for, including detailed breakdown of tasks.

Non-payment or withholding of funds: The Council reserves the right to withhold funding or refuse payment in the event the CLH does not comply with the Funding Agreement or fails in areas of due diligence or operates outside the law.

Community led housing groups seeking to apply for grant ([hyper link to application form](#)) or requiring more information should email the Housing Enabling Team at CommunityLedHousing@eastsoffolk.gov.uk



Housing Supply Director
Department for Communities and Local
Government

3rd Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Tel: 0303 444 4053

housingsupplydirectors@communities.gsi.gov.uk

www.gov.uk/dclg

23 December 2016

Dear Chief Executive

Community Housing Fund

You may recall that, at Budget 2016, a £60 million fund was announced to support community-led housing developments in areas where the impact of second homes is particularly acute. As part of this commitment, I am pleased to inform you that your local authority has been allocated funding for 2016/17 financial year, as shown in the Annex below.

The fund will enable local community groups deliver affordable housing units of mixed tenure on sites which are likely to be of little interest to mainstream housebuilders and will thereby contribute to the overall national effort to boost housing supply. The fund will also help build collaboration, skills and supply chains at a local level to promote the sustainability of this approach to housebuilding. The fund will enable capital investment, **technical support and revenue to be provided to make more schemes viable and significantly increase community groups' current delivery pipelines**. The funding is allocated between local authorities proportionate to the number of holiday homes in the local area and taking account of the affordability of housing to local people.

In bringing this fund forward, the Department has worked closely with the National Community Land Trust Network and other members of the community-led housing sector. These organisations are well placed to offer advice on how the funds may be most effectively deployed (including, potentially, through registered providers of affordable housing) and are likely to get in touch with you to discuss the opportunities. The sector stakeholder groups have produced guidance to local authorities explaining what community-led housing is and how the grant funding may be used. This guidance is attached separately.

Payments of funding will be made in two tranches; the first being paid now. The second tranche will follow in early 2017 subject to your authority providing satisfactory evidence that the money is being spent in accordance with the objectives outlined in the Budget announcement. Similarly, from 2017/18 onwards, allocations will depend in part on how the 2016/17 allocation has been spent.

The Chancellor has asked that we review the outcomes achieved from the fund and the community-led housing delivery model at a later date. We would be grateful for your co-operation in helping us with that review.

Should you have any questions about this funding, please contact Nigel Kersey at: Nigel.Kersey@communities.gsi.gov.uk.

Two handwritten signatures in blue ink. The first signature on the left is 'Isobel Stephen' and the second signature on the right is 'Emma Lindsell'.

Isobel Stephen and Emma Lindsell
Director, Housing Supply Directorate

Enc

ANNEX**Community Housing Fund - Grant Allocations to Local Authorities, 2016/17**

No.	Local Authority	Amount (£)
1	Adur	£48,819
2	Allerdale	£772,554
3	Arun	£706,119
4	Babergh	£189,741
5	Barnet	£89,083
6	Bournemouth UA	£744,369
7	Breckland	£181,689
8	Brent	£53,349
9	Brentwood	£8,053
10	Brighton and Hove	£464,539
11	Bromley	£62,408
12	Broxbourne	£7,046
13	Cambridge	£52,342
14	Camden	£134,379
15	Canterbury	£442,394
16	Castle Point	£20,132
17	Chelmsford	£20,635
18	Chichester	£1,386,067
19	Chiltern	£25,668
20	Christchurch	£417,229
21	City of London	£40,767
22	Copeland	£193,768
23	Cornwall UA	£5,117,980

24	Cotswold	£882,272
25	Craven	£605,964
26	Croydon	£43,283
27	Dacorum	£27,178
28	Derbyshire Dales	£383,509
29	Dover	£508,829
30	Ealing	£59,892
31	East Devon	£1,210,418
32	East Dorset	£158,034
33	East Hampshire	£99,652
34	East Hertfordshire	£36,237
35	East Lindsey	£2,250,723
36	East Riding of Yorkshire UA	£2,042,864
37	Eastbourne	£365,894
38	Eden	£938,640
39	Elmbridge	£44,793
40	Enfield	£29,191
41	Epping Forest	£32,211
42	Epsom and Ewell	£17,615
43	Forest of Dean	£111,228
44	Fylde	£440,381
45	Great Yarmouth	£652,770
46	Greenwich	£57,375
47	Guildford	£70,461
48	Hackney	£36,740
49	Hambleton	£195,277

50	Hammersmith & Fulham	£90,089
51	Haringey	£58,382
52	Harrogate	£585,832
53	Harrow	£37,747
54	Hart	£24,661
55	Hastings	£244,097
56	Havant	£264,228
57	Havering	£21,642
58	Herefordshire UA	£502,789
59	Hertsmere	£21,138
60	Hillingdon	£43,786
61	Horsham	£144,948
62	Hounslow	£57,375
63	Isle of Wight UA	£1,567,252
64	Isles of Scilly	£49,826
65	Islington	£74,991
66	Kensington & Chelsea	£225,978
67	Kings Lynn & West Norfolk	£1,781,152
68	Kingston upon Thames	£32,211
69	Lambeth	£87,573
70	Lancaster	£707,629
71	Lewes	£180,179
72	Lewisham	£37,747
73	Maldon	£190,748
74	Malvern Hills	£168,100
75	Merton	£39,257

76	Mid Devon	£131,359
77	Mid Suffolk	£225,475
78	Mid Sussex	£46,806
79	Mole Valley	£39,257
80	New Forest	£976,387
81	Newham	£35,230
82	North Devon	£667,869
83	North Dorset	£238,057
84	North East Lincolnshire UA	£203,833
85	North Norfolk	£2,436,942
86	Northumberland UA	£1,314,600
87	Oxford	£54,859
88	Poole UA	£765,508
89	Purbeck	£910,456
90	Redbridge	£42,780
91	Ribble Valley	£157,531
92	Richmond upon Thames	£77,507
93	Richmondshire	£493,730
94	Rochford	£16,105
95	Rother	£748,899
96	Rutland UA	£57,375
97	Ryedale	£431,322
98	Scarborough	£1,860,672
99	Sedgemoor	£485,174
100	Sevenoaks	£51,839
101	Shepway	£437,361

102	Shropshire UA	£580,296
103	South Bucks	£29,191
104	South Cambridgeshire	£50,329
105	South Hams	£1,881,307
106	South Lakeland	£2,357,421
107	South Oxfordshire	£139,915
108	South Somerset	£263,222
109	Southwark	£120,790
110	St Albans	£28,688
111	Stratford-on-Avon	£215,409
112	Stroud	£149,478
113	Suffolk Coastal	£1,524,473
114	Surrey Heath	£17,112
115	Sutton	£29,694
116	Swale	£341,232
117	Tandridge	£29,694
118	Teignbridge	£581,303
119	Tendring	£706,622
120	Thanet	£598,918
121	Three Rivers	£14,595
122	Tonbridge & Malling	£23,655
123	Torbay UA	£643,208
124	Torridge	£448,434
125	Tower Hamlets	£86,063
126	Tunbridge Wells	£66,938
127	Uttlesford	£34,224

128	Waltham Forest	£36,740
129	Wandsworth	£121,293
130	Watford	£6,040
131	Waveney	£685,484
132	Waverley	£75,997
133	Wealden	£301,472
134	West Devon	£247,620
135	West Dorset	£1,365,432
136	West Oxfordshire	£376,966
137	West Somerset	£574,760
138	Westminster	£343,245
139	Weymouth & Portland	£430,315
140	Wiltshire UA	£650,254
141	Winchester	£90,089
142	Windsor & Maidenhead UA	£103,175
143	Woking	£15,099
144	Wokingham UA	£49,826
145	Wychavon	£252,653
146	Wycombe	£115,254
147	Wyre	£377,973
148	Wyre Forest	£191,251
ENGLAND		£60,000,000