



SCRUTINY COMMITTEE

Thursday, 19 October 2023

Subject	Review of Affordable Housing Planning Requirements
Cabinet Member	Councillor Kay Yule, Cabinet Member with responsibility for Planning and Coastal Management
Report Author(s)	<p>Ben Woolnough Planning Manager (Development Management, Major Sites and Infrastructure) ben.woolnough@eastsoffolk.gov.uk 07833 406681</p> <p>Andrea McMillan Planning Manager (Policy, Delivery and Specialist Services) andrea.mcmillan@eastsoffolk.gov.uk 01394 444567</p> <p>Adam Nicholls Principal Planner (Policy and Delivery) adam.nicholls@eastsoffolk.gov.uk 07881 005429</p>
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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:

Scrutiny Committee has requested a review of affordable housing requirements required/secured through the planning process. The 'lines of enquiry' form the basis of the report and each are responded to within the report.

Options:

None. The scope has been defined and the report provides information in relation to this.

Recommendation/s:

That Scrutiny Committee considers the contents of the report.

Corporate Impact Assessment

Governance:

No impacts.

ESC policies and strategies that directly apply to the proposal:

Relevant policies are explained in responding the lines of enquiry set out in the Scope.

Environmental:

No impacts.

Equalities and Diversity:

Not applicable – but equalities impacts have been considered in the preparation and adoption of Local Plan policies and the Affordable Housing Supplementary Planning Document.

Financial:

No impacts.

Human Resources:

No impacts.

ICT:

No impacts.

Legal:

No impacts.

Risk:

None identified.

External Consultees:

Written information from three representatives of the development sector is attached at Appendix B.

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 checked="" 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 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?			
Affordable housing contributes to the overall supply of housing needed to maintain and grow a vibrant and sustainable economy, and to ensure we have the right supply of housing in the right places (P01). Delivery of affordable housing contributes towards maximising health and wellbeing in the district (P08) and to addressing deprivation (P07).			

Background and Justification for Recommendation

1 Background facts	
1.1	The scope of the Scrutiny Committee’s queries in respect of affordable housing planning requirements are addressed by reference to each specific question throughout this report. This report considers each of the questions and presents information in respect of these for Scrutiny Committee to consider. This report precedes a report that will be brought to Scrutiny Committee in November led by the Housing Service on ‘Review of the Provision of Social Housing in East Suffolk’; the two should be viewed collectively in demonstrating the Council’s role in the delivery and provision of affordable housing.
1.2	The Council adopted the East Suffolk Affordable Housing Supplementary Planning Document in May 2022 (attached at Appendix B), to provide additional guidance on implementing the affordable housing Local Plan policies. This contains much of the information related to the scope of this report and will be referred to throughout the report. The SPD is a material consideration in determining applications for planning permission.
1.3	Members received training on affordable housing and viability on 2 nd October 2023. The content of the training covered much of the scope of this report and it is recommended that the recording of this training is watched by all members of the Scrutiny Committee to accompany this report.
1.4	Written information on the topic has been received from three representatives of the development sector and is incorporated in Appendix B.

2 Current position	
	What legislation and national guidance relates to this?
2.1	<p>The current (September 2023 version) National Planning Policy Framework (NPPF) sets out national planning policies on affordable housing. Chapter 5 of the NPPF ‘Delivering a Sufficient Supply of Homes’ includes policy on how Local Plans are expected to identify needs for affordable housing and incorporate planning policies to deliver affordable housing. The Affordable Housing SPD contains references to relevant parts of the NPPF.</p> <p>In terms of affordable housing, key parts of the NPPF are:</p> <p><u>Paragraph 62</u> – sets out that the needs for affordable housing should be assessed and reflected in planning policies (amongst needs for other types of housing).</p> <p><u>Paragraph 63</u> – sets out that planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or a financial contribution in lieu can be robustly justified and that this contributes to the objective of creating mixed and balanced communities.</p> <p><u>Paragraph 64</u> – sets out that provision of affordable housing should not be sought for residential developments that are not major developments (other than in</p>

	<p>designated rural areas where policies may set out a lower threshold of 5 units or fewer).</p> <p>The NPPF sets out the tests of soundness against which Local Plans are examined (paragraph 35) including that Local Plans are “justified” and “effective”. In this regard, viability assessment is an important part of Local Plan preparation. Paragraph 58 of the NPPF sets out that where up-to-date policies have set out the contributions expected from development (which would include affordable housing) planning applications that comply with them should be assumed to be viable, and that it will be up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the planning application stage.</p>
2.2	<p>The Suffolk Coastal Local Plan was prepared and examined against the 2018 iteration of the NPPF (which was largely similar to the current 2023 NPPF in terms of setting Local Plan policies for affordable housing) and the Waveney Local Plan was prepared and examined against the original 2012 NPPF. Any nuances or differences resulting are identified in this report.</p>
2.3	<p>The NPPF is supported by the Planning Practice Guidance (PPG), which sets out further guidance on a number of topics including on ‘Housing needs of different groups’, ‘Build to Rent’ and ‘First Homes’, which include guidance on affordable housing, and on Viability. The Affordable Housing SPD contains reference to relevant guidance contained in the PPG.</p>
2.4	<p>In terms of securing affordable housing through planning permissions, Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended) sets out that planning obligations (which is how affordable housing is secured – it cannot usually be via a planning condition) must only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.
	<p>What are the requirements that developers must provide (including the provision of affordable housing) and in what situation?</p>
2.5	<p>The Council’s two Local Plans, Suffolk Coastal Local Plan (2020) and Waveney Local Plan (2019) set out numerous policies which include requirements that developments are expected to provide. This ranges from elements such as on site infrastructure such as schools and community centres, off site infrastructure funding, open space, to provision of access, to infrastructure to facilitate cycling and walking. In addition, most housing developments pay Community Infrastructure Levy (CIL) which is used to deliver the essential infrastructure for developments. One key requirement of policy is the provision of affordable housing which is the focus of this report. Full details of all of the policy expectations on development are set out in the Local Plans. ‘Made’ Neighbourhood Plans, which are also part of the development plan along with the Local Plans, also contain local policies.</p>
2.6	<p>Affordable housing is delivered through planning policies primarily through one of two ways:</p>

	<p>1) through policies that require a proportion of affordable housing as part of certain market housing developments and</p> <p>2) through policies that provide support for affordable housing schemes to come forward in certain circumstances as an exception to planning policies for housing (known as ‘exception sites’).</p> <p>Affordable housing is also delivered on schemes brought forward for entirely affordable housing (including – but not limited to – exception sites), or for a proportion larger than policy thresholds, usually by Registered Providers.</p>												
2.7	<p>East Suffolk Council has two Local Plans, the Suffolk Coastal Local Plan (adopted in September 2020) and the Waveney Local Plan (adopted in March 2019). The Local Plans form part of the development plan, along with any made Neighbourhood Plans and the Minerals and Waste plans, and under section 38(6) of the Planning and Compulsory Purchase Act 2004 decisions should be taken in accordance with the development plan unless material considerations indicate otherwise.</p>												
2.8	<p>The key Local Plan policies related to affordable housing are:</p> <p>The Suffolk Coastal Local Plan -</p> <p>SCLP 5.10: Affordable Housing on Residential Developments</p> <p>SCLP5.11: Affordable Housing on Exception Sites.</p> <p>The Waveney Local Plan -</p> <p>WLP8.2: Affordable Housing</p> <p>WLP8.6: Affordable Housing in the Countryside.</p>												
2.9	<p>The Affordable Housing Supplementary Planning Document (May 2022) (Appendix A of this report) contains guidance to assist in the implementation of the policies contained in East Suffolk Council’s Local Plans regarding affordable housing. The Local Plan requirements in relation to when and how much affordable housing should be provided are summarised on page 13 of the SPD, and set out in the table below:</p> <table border="1"> <thead> <tr> <th></th> <th>Threshold</th> <th>Requirement</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>Suffolk Coastal Local Plan (SCLP5.10)</td> <td>10 dwellings or more and/or sites of 0.5ha or more</td> <td>1 in 3 – applies to whole plan area. No affordable housing is required on 100% flatted developments on brownfield sites.</td> <td>50% affordable rent / social rent 25% shared ownership 25% discounted home ownership</td> </tr> <tr> <td>Waveney Local Plan (WLP8.2)</td> <td>11 dwellings or more</td> <td>20% in Lowestoft and Kessingland (excluding Corton) 40% in Southwold and Reydon 30% elsewhere</td> <td>50% affordable rent</td> </tr> </tbody> </table>		Threshold	Requirement	Tenure	Suffolk Coastal Local Plan (SCLP5.10)	10 dwellings or more and/or sites of 0.5ha or more	1 in 3 – applies to whole plan area. No affordable housing is required on 100% flatted developments on brownfield sites.	50% affordable rent / social rent 25% shared ownership 25% discounted home ownership	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
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	<p>In the Suffolk Coastal Local Plan area, the exception to the requirement is on brownfield flatted sites, where through the Local Plan Examination the Inspector concluded that for viability reasons affordable housing should not be required.</p> <p>Residential developments below the thresholds cannot be required to provide affordable housing.</p> <p>The differences in thresholds between Suffolk Coastal and Waveney are explained in paragraphs 2.15 – 2.17 below.</p>
2.10	<p>The artificial sub-division of a site to try to evade affordable housing requirements is not acceptable. As an example, if part of a greenfield site with a total capacity for about 18 dwellings comes forward in the Suffolk Coastal area as a nine-dwelling scheme (without good reason), with the likelihood of a second phase of nine coming forwards later, the full affordable housing requirement will be sought (i.e. three units, with six market units). The SPD sets out that sites should not be divided in this way (see paragraph 7.48).</p>
2.11	<p>The needs for affordable housing, and for different tenures, was assessed through the Strategic Housing Market Assessment (SHMA) Part 2 which underpins the affordable housing policies contained in the Local Plans. For the Suffolk Coastal Local Plan area, reference should also be made to the SHMA Part 2 Partial Update of January 2019, which reflected the change in overall housing requirement during preparation of the Plan. The tenure mix conclusions of the SHMA, set out in the conclusions in Chapter 7 of the respective SHMA documents, have informed the affordable housing tenure split in the Local Plan policies.</p>
2.12	<p>The Strategic Housing Market Assessment was prepared in accordance with guidance contained in the NPPF and PPG in place at the time. The Strategic Housing Market Assessment identified that in the Suffolk Coastal Local Plan area there is a net need for affordable housing for 94 households per year and in the Waveney Local Plan area a net need for affordable housing for 208 households per year, over the Plan period to 2036. For the Waveney Local Plan, given the level of need, consideration was given to whether higher requirements for affordable housing could be achieved. Paragraph 8.11 of the Waveney Local Plan explains that this need of 208 amounts to 55% of the total annual need for housing and that the Whole Plan Viability Assessment demonstrates that this level of affordable housing would make housing developments financially unviable. The Whole Plan Viability Assessment has informed the requirements set out in the table in paragraph 2.9 above, as explained in paragraph 8.14 of the Waveney Local Plan. The Waveney Local Plan over-allocates sites for housing development to specifically help to address the need for affordable housing.</p>
2.13	<p>The Local Plans were subject to a rigorous process of preparation, including three rounds of public consultation each prior to submission for Examination (plus a further round of consultation on ‘main modifications’ during the Examination). The independent Inspectors who examined the Local Plans considered the evidence, representations made to the Plan and national policy and guidance in reaching their conclusions on the Plans. The Suffolk Coastal Local Plan Inspector’s Report shows the Inspector’s consideration of Policy SCLP5.10 (paragraphs 91 – 94 in particular). The Waveney Local Plan Inspector’s Report also shows the careful consideration given to provision for affordable housing and policy WLP8.2 by the Inspector (paragraphs 25 and 147 – 149 in particular).</p>

	In planning terms, what is the definition of “affordable housing”?
2.14	Affordable housing is defined in the glossary (Annex 2) of the NPPF and can broadly be split into two groups – affordable housing for rent and affordable housing for purchase. First Homes were also introduced in 2021 (through the First Homes PPG) as a new tenure of Affordable Housing; however, the Annex to the NPPF has not yet been updated to reflect this. Chapter 2 of the Affordable Housing SPD explains the types of Affordable Housing in detail, including ‘affordable rent and social rent’, ‘shared ownership’, ‘shared equity’, ‘discount home ownership’ ‘starter homes’, ‘rent to buy’ and ‘First Homes’.
	How does the Council determine the thresholds for requiring affordable housing?
2.15	The thresholds were determined through the Local Plans, that were prepared to be in compliance with the policy in the NPPF in place at the time.
2.16	The Waveney Local Plan was prepared and examined against the 2012 NPPF. Whilst the 2012 NPPF did not itself include thresholds, a Written Ministerial Statement was published in 2014 which set out that for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought. A lower threshold of 5 dwellings or fewer could be applied in designated rural areas. This was subsequently incorporated into Planning Practice Guidance. Paragraph 8.13 of the Waveney Local Plan explains this position.
2.17	The Suffolk Coastal Local Plan was prepared and examined under the 2018 NPPF which set out that affordable housing can be required on “major” developments (paragraph 63 of the 2018 NPPF was the same as paragraph 64 of the 2023 NPPF - see paragraph 2.1 above). Major developments are defined in the NPPF, for housing, as development of 10 or more homes or where the site area is 0.5 hectares or more. There is therefore a difference between the thresholds in the two Local Plans.
2.18	The Local Plans were subject to viability testing and to consultation during their preparation. The Local Plans were subject to independent examination, under which the respective Inspectors assessed whether the plans were ‘consistent with national policy’ (amongst other ‘tests of soundness’). As explained in paragraph 2.13 above, the Inspector for each Local Plan carefully considered the affordable housing approach and policies in the Local Plans in reaching their conclusions on the plans.
	Are thresholds different in similar and neighbouring authorities (provide a chart)?
2.19	<p>Thresholds in other authorities’ Plans will be largely dependent on the age of the relevant policies and the national policy in place at the time.</p> <p>The local planning authorities adjoining East Suffolk are: Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council, South Norfolk District Council, Great Yarmouth Borough Council and the Broads Authority. Some of these authorities also show similar characteristics with East Suffolk, noting that Babergh and Mid Suffolk were classified as similar to the former Suffolk Coastal area in the ONS area classifications.</p>

The information below has been taken from the latest adopted Local Plans for those local authorities; however, it needs to be treated with a degree of caution noting the age of some of the plans which will have preceded current national policy which will now inform what is being sought on developments. Policies in emerging Local Plans are also included in the table where they are well advanced in preparation.

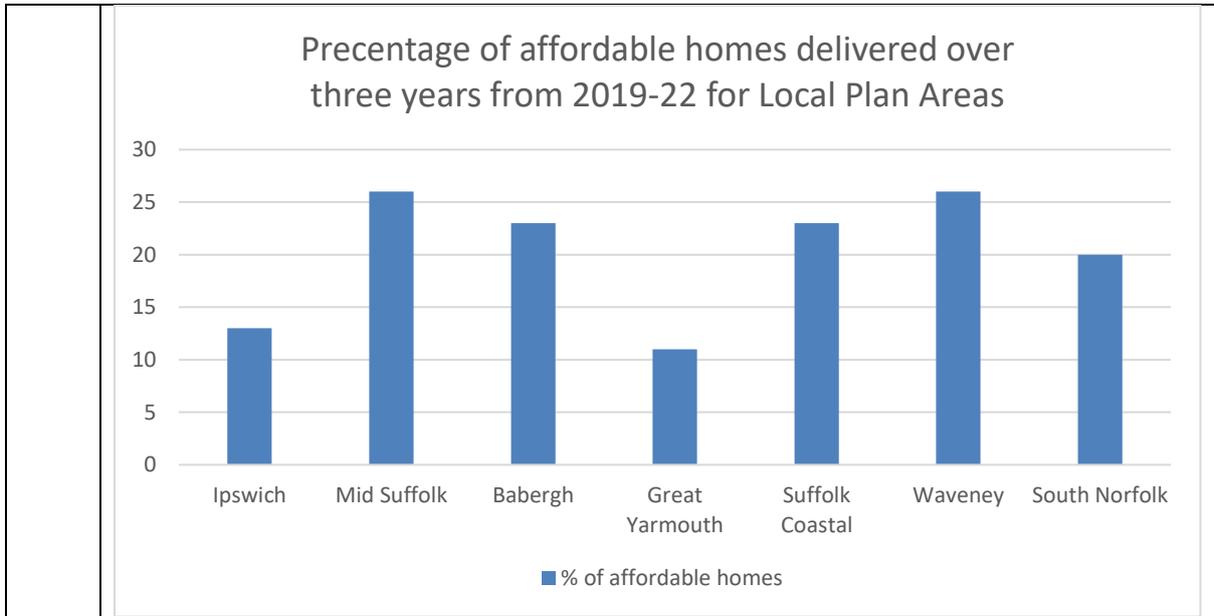
Authority/Local Plan	Threshold	Requirement	Source
Babergh and Mid Suffolk emerging Joint Local Plan (Inspector's Report received September 2023, Plan anticipated to be adopted in late November 2023)	Sites of 10 or more dwellings or 0.5ha or more	35% on greenfield sites; 25% on brownfield sites	https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/k01-bmsdc-jlp-final-report-and-schedule (policy SP02)
Mid Suffolk Local Plan First Alteration (July 2006) (will be superseded by policy SP02 on adoption of the new Joint Local Plan, above)	Sites of 15 dwellings or more, or sites of 0.5 hectares in Stowmarket and Needham Market, and sites of 5 dwellings for more, or sites of 0.17 hectares in the remainder of Mid Suffolk <i>(note - national policy changes update what is asked for)</i>	Up to 35%	https://www.midsuffolk.gov.uk/documents/d/mid-suffolk/msdc-affordable-altered-h4-policy-pdf (policy H4)
Babergh Core Strategy (2014) (will be superseded by policies SP02 and LP07 on adoption of the new Joint Local Plan, above)	All residential development <i>(note - national policy changes update what is asked for)</i>	35%	https://www.babergh.gov.uk/documents/d/babergh/core-strategy-and-policies-final-feb-2014 (policy CS19)
Ipswich Borough Local Plan (2022)	15 dwellings or more or sites of 0.5ha or more (outside of Ipswich Garden Suburb and northern end of Humber Doucy Lane).	15%	www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_development_erratum_with_plans_0.pdf (policy CS12)

	Does not apply to development of 65% or more flats on brownfield sites.		
	Allocated site at northern end of Humber Doucy Lane	30%	www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_development_erratum_with_plans_0.pdf (policy ISPA4)
	Ipswich Garden Suburb	31%	www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_development_erratum_with_plans_0.pdf (policy CS10)
Great Yarmouth Local Plan Part 2 (2021)	Caister-on-Sea, Gorleston, Great Yarmouth North and Northern Rural – 10 dwellings or site area of 0.5ha or more	20%	www.great-yarmouth.gov.uk/media/6579/Adopted-Local-Plan-Part-2-2021/pdf/Adopted-Local-Plan-Part-2-2021.pdf?m=637746476248570000 (policy UCS4)
	Bradwell, Great Yarmouth South and South Quay, Gorleston West and South West Rural – 10 dwellings or site area of 0.5ha or more	10%	www.great-yarmouth.gov.uk/media/6579/Adopted-Local-Plan-Part-2-2021/pdf/Adopted-Local-Plan-Part-2-2021.pdf?m=637746476248570000 (policy UCS4)
	Great Yarmouth Town Centre – 15 dwellings or site area of 0.5ha or more	10%	www.great-yarmouth.gov.uk/media/6579/Adopted-Local-Plan-Part-2-2021/pdf/Adopted-Local-Plan-Part-2-2021.pdf?m=637746476248570000 (policy UCS4)
South Norfolk (Joint Core Strategy)	5-9 dwellings <i>(note: this has not</i>	20%	www.gnlp.org.uk/sites/gnlp/files/2021-

for Broadland, Norwich and South Norfolk 2011)	<i>been applied since November 2014, when a national threshold of 10 dwellings was introduced)</i>		01/JCS-adopted-doc-2014.pdf (policy 4)
	10-15 dwellings	30%	www.gnlp.org.uk/sites/gnlp/files/2021-01/JCS-adopted-doc-2014.pdf (policy 4)
	16+ dwellings	33%	www.gnlp.org.uk/sites/gnlp/files/2021-01/JCS-adopted-doc-2014.pdf (policy 4)
South Norfolk (Greater Norwich Local Plan) (Submission version 2021))	10+ dwellings	At least 33% (at least 28% in Norwich City)	www.gnlp.org.uk/sites/gnlp/files/2021-10/Reg%2019%20final%20formatted_0.pdf (policy 5)
Broads Local Plan (2019)	Developments of 10 or more dwellings to provide affordable housing in accordance with the policies of the relevant district Council. Off site contributions sought for schemes of 6-9 dwellings.	As per Waveney Local Plan	www.broads-authority.gov.uk/data/assets/pdf_file/0036/259596/Local-Plan-for-the-Broads.pdf (policy DM34)

Affordable housing delivered 2019/20-2021/22:

- Ipswich (116 of 913 homes affordable) = 13% affordable housing
- Mid Suffolk (517 of 1,985 homes affordable) =26% affordable housing
- Babergh (333 of 1,453 homes affordable) = 23% affordable housing
- Great Yarmouth (135 of 1,180 homes affordable) = 11% affordable housing
- Suffolk Coastal Local Plan area (401 of 1,670 homes affordable) = 23% affordable housing
- Waveney Local Plan area (178 of 680 homes affordable) = 26% affordable housing
- South Norfolk (539 of 2,703 homes affordable) = 20% affordable housing



It should be noted that total completions will include all housing completions, including those on smaller sites where no affordable housing is required.

What are viability assessments and what is best practice guidance in relation to what should be contained in the viability assessments?

2.20 Chapter 9 of the [Affordable Housing SPD](#) sets out guidance on viability assessments at the planning application stage, emphasising that the Council will only support a reduction in affordable housing provision in exceptional circumstances and where demonstrated by a viability assessment, which the authority would need to be satisfied with. Reflecting the needs for affordable housing in the Waveney area, the Waveney Local Plan also sets out under Policy WLP8.2, that 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. Detailed guidance on viability assessments is included in Appendix G of the Suffolk Coastal Local Plan and Appendix 5 of the Waveney Local Plan – these are not repeated in the SPD.

How do we work with developers who feel that a development would not be viable if affordable housing was required? How often does this situation tend to happen?

2.21 As mentioned in paragraph 2.20 above, there is detailed guidance on the viability appraisal process in the two Local Plans, which must be followed. It is not that uncommon for applicants (or potential applicants) to try to claim that sites are not viable for the full complement of affordable housing, especially given that there has been a significant increase in development costs over the past few years, (driven largely by the material cost rises and effects of Covid and the Ukraine war). However, officers will always scrutinise such claims carefully and, in at least some cases, not all assumptions are found to be fully justified or evidenced. Where

	<p>agreement cannot be reached on the conclusions of the applicant’s Viability Appraisal, then the Council will, at the applicant’s cost, commission an independent review by an external professional, with a revised Viability Appraisal normally produced.</p> <p>In certain circumstances, where it is accepted there is a genuine viability case, then a lower proportion of affordable housing and/or a different tenure mix of affordable housing, will be agreed, as allowed for in the two Local Plan Affordable Housing policies. Where this is agreed, an “overage” clause must be included in the S106 planning obligation, so that if sales values/profits increase later on (beyond projected values), thereby improving the viability, the “surplus” will be recouped by the Council (up to the level that would originally have been secured had a full complement of affordable housing been achieved originally).</p> <p>In the past two years there have been eight planning applications which have sought to reduce or remove affordable housing on viability grounds. In four of these a reduction or complete loss was agreed, four are under consideration.</p>
	<p>How does Planning encourage developers to provide more affordable housing than just the minimum requirements?</p>
<p>2.22</p>	<p>As affordable housing is a planning policy requirement with a fixed percentage to achieve, there is no planning justification for the Local Planning Authority to ask for any affordable housing over and above the policy requirement. Affordable housing is usually secured as an obligation in a Section 106 Agreement. In securing a Section 106 obligation there are three legal tests to apply. Any obligation must be:</p> <ul style="list-style-type: none"> a. necessary to make the development acceptable in planning terms b. directly related to the development; and c. fairly and reasonably related in scale and kind to the development. <p>If the policy seeks 30% affordable housing, then a Section 106 obligation for e.g. 40% affordable housing would fail tests a) and b) above. An over-provision which is also relied upon as a material consideration in a planning application therefore needs to be approached carefully to avoid being of excessive influence on decision making, which could result in a decision being unlawful.</p> <p>Therefore, when a development is seeking to deliver more than the policy amount of affordable housing, it is usually the case that the ‘extra’ affordable housing is not secured by the Section 106 Agreement. It becomes a voluntary proposal from the applicant and, in turn, the benefit of that extra affordable housing may not be a material planning consideration in the determination of the planning application.</p> <p>The exception to this is where the development is an affordable housing ‘Exception Site’, where the policy allows for development where housing would otherwise not be permitted (outside of a Settlement Boundary) and the policy justifies the development on the basis of 100% (or the majority) of the development being affordable housing.</p>

	Therefore, as East Suffolk has up-to-date Local Plan policies to secure affordable housing, officers should not and do not ask for developers to deliver more than the policy-compliant level of affordable housing. Asking for such an over-provision might have consequences in respect of other policy requirements such as self-build housing, quality of design and open space provision.
	Do we ever incentivise developers to meet our affordable housing policy requirements e.g. a fast track scheme?
2.23	No, we do not. We have to treat all applications equally in terms of the service provided and we have no policy to allow for 'fast-tracking' of certain applications. Applications for even 100% affordable housing have to pay the same planning application fee and require essentially the same planning considerations, supporting documents and determination timeframe as any other development. As the expectation is that affordable housing policy requirements will be met, unless it can be satisfactorily demonstrated that this is not viable, there is no role for providing incentives to meet these requirements. If a site cannot viably deliver the policy compliant affordable housing, fast tracking a planning application will not alter this position.
	How and when do we engage with local developers? Do we hold regular forums to understand their needs and for us to outline our priorities such as the provision of affordable housing?
2.24	Developers and landowners were engaged through the preparation of both Local Plans, including through three rounds of consultation prior to Submission, and a further consultation on 'main modifications' during the Examinations. Developers (including land owners, agents etc) were also engaged in the preparation of the Strategic Housing Market Assessment (SHMA) in relation to the methodology for calculating affordable needs (as detailed in Appendix A1 of the SHMA).
2.25	During the preparation of the Affordable Housing SPD, in addition to the two rounds of consultation, two (virtual) round table events were held with developer representatives in relation to the Section 106 model heads of terms that are incorporated into the SPD (Appendix 2). Details of this engagement is set out in the Consultation Statement that is published alongside the SPD. This engagement was important in ensuring that guidance is informed by a detailed understanding of the development sector, with the aim of providing guidance that is appropriately applied by all.
2.26	We have in the past held regular Developer Forums and have recently re-established these. This provides an opportunity to directly engage on implementation of our Local Plan policies and guidance (not just in relation to affordable housing).
2.27	The Council encourages developers to seek pre-application advice and this is also encouraged by the NPPF. In doing so, this often presents an opportunity to inform the housing mix of development proposals, including the mix of affordable properties influenced by information on local housing needs. Pre-application advice in respect of development design can ensure that a greater quality of affordable housing is achieved, particularly in respect of its location within developments and its design, which should be 'tenure blind' (meaning that it is indistinguishable from open market housing). The Council also encourages pre-application engagement with communities and the Statement of Community

	Involvement advises in this respect Statement-of-Community-Involvement.pdf (eastsuffolk.gov.uk) . This can ensure that communities are familiar with proposals early and so that the benefits of the affordable housing can be communicated.
	Why do developers want to commute instead of providing affordable housing?
2.28	<p>Chapter 5 of the Affordable Housing SPD explains ‘Financial Contributions’, generally known as ‘Commuted Sums’. It explains the circumstances where a commuted sum maybe accepted in place of on-site affordable housing. When collecting commuted sums, these are calculated on a per dwelling basis and the amounts are published annually on the website and vary depending on the property values of the area East-Suffolk-Affordable-Housing-Commuted-Payment-Schedule.pdf (eastsuffolk.gov.uk). Any commuted sum is secured by a planning obligation in a Section 106 agreement. Usually that contribution will have to be spent within 10 years of receipt, or it is returned to the developer.</p> <p>Generally, developers do not want to pay commuted sums instead of providing affordable housing and they are not encouraged to do this by the Council. In many major sites, the early investment from Registered Providers through the purchase of Section 106 affordable properties is valuable to developers, compared instead with a significant early financial contribution as an added cost at an early stage. However, some circumstances – such as flatted development mixed with open market housing or a very small affordable provision (e.g. two units) – might dictate that interest in the affordable housing by Registered Providers to take on that affordable housing is very low or even non-existent (due to significant management difficulties and therefore costs).</p> <p>Commuted sums in place of affordable housing are therefore not presently very common in East Suffolk, with the only normal exception being the collection of commuted sums for partial dwelling calculations. This is where the affordable housing requirement of a development does not calculate as a full number so for example a development of 12 dwellings requiring 30% affordable housing would result in 3.6 dwellings. The policy is to secure a commuted sum for the 0.6 of a dwelling and 3 on site dwellings, rather than rounding the total up or down. The SPD explains this.</p>
	When and with whom is it negotiated if they want to commute? Are Councillors involved or informed?
2.29	<p>If it is determined within an application that a commuted sum is appropriate, then this is established during the planning application process. This will be through consultation with the Housing team and it may have been influenced through specialist expert development viability advice, usually through an external consultant. The affordable housing mix which would be required as an on-site provision would guide an equivalent calculation based on this annually updated information on commuted sum rates www.eastsuffolk.gov.uk/assets/Planning/Section-106/East-Suffolk-Affordable-Housing-Commuted-Payment-Schedule.pdf.</p> <p>In some cases, a development viability process may reach a point of disagreement over the viability of a development between the Council (via an expert consultant) and the applicant. There have been instances where a judgement needs to be</p>

	<p>made on whether the strength of disagreement warrants refusal of an application (or the maintenance of a reason for refusal in an appeal). If there is a risk that a refusal could result in losing an appeal, with a risk of costs being awarded against the Council and potential no affordable contribution at all, then negotiation may influence a conclusion. This may include settling the viability disagreement over the amount of on-site affordable housing by instead agreeing to a commuted sum secured by a planning obligation in a Section 106 agreement. That commuted sum would be established based on a level of viability which may be established as potentially remaining in the development. For example, if it is agreed that the development can achieve a surplus (after profit) of £100,000, then that is the sum collected. Alternatively, the applicant may settle the disagreement through committing to a commuted sum to the equivalent value of X no. affordable homes and the amount calculated accordingly.</p> <p>There have been two cases of this in recent years. Both involved retirement/older living developments being considered at the same time in Halesworth, securing a total of £870,000. One of those applications went to appeal. In both applications it was agreed that the policy amount of affordable housing could not be secured but it was negotiated through evidence that there was some viability surplus which could enable a commuted sum. Considerable officer and consultant time went into establishing that position.</p>
	<p>Can we say no - that they must provide the housing? If so, does it have to be within a policy or can it be determined on an individual basis dependent on local circumstances?</p>
2.30	<p>The policies in the Local Plans set out that the Council will only support a reduction in affordable housing provision in exceptional circumstances and where demonstrated by a viability assessment (see paragraph 2.18 above).</p> <p>The Council can only require affordable housing provision in accordance with the thresholds and amounts set out in policies SCLP5.10 and WLP8.2 (see paragraph 2.8 above). It is important that such requirements are set in policies, not only to accord with the policy in the NPPF (see paragraph 2.1) but also to ensure that developers are aware of requirements up front as this will affect viability considerations from the outset. The affordable housing policies also informed the recent preparation (and, from 1st August 2023, adoption) of the East Suffolk CIL Charging Schedule, enabling consideration to be given to the viable amount of CIL in the knowledge of affordable housing requirements in any given location throughout the district.</p>
	<p>What happens to the sums of money if commuted?</p>
2.31	<p>Historically commuted sums were collected across both Suffolk Coastal and Waveney Districts to be spent in a small geographical area. In some cases, the S106 Agreement collecting the sum has restricted the spending to within the same parish or town. In other cases it has been a wider area extending to a whole ward or multiple wards. Others have extended it to the whole of the former District areas.</p> <p>This has created some past and current difficulties in being able to spend commuted sums within the stipulated geographical area (generally, the smaller</p>

the area, the greater the difficulty). Often the biggest challenge is finding and acquiring land to spend the sum. If the sum also isn't large enough, then it would depend upon combining it with other sums. That process can be a significant burden on the Council without significant housing gain.

Normal practice now is to collect commuted sums which can be spent across the whole of East Suffolk. This means that collected sums can be pooled and spent on larger projects where the Council already has development land or planned affordable housing projects. Recently the Council has committed £540k of commuted sums collected from past developments consented in 2013 and 2015 to the Deben Fields development in Felixstowe.

The Council can also transfer commuted sums to Registered Providers for their own affordable housing projects. In 2022 The Council transferred £60k to Orwell Housing towards an affordable development in Parham.

Committed sums can only be spent on the creation of new and additional affordable housing and they usually have to be spent within 10 years of receipt or are returned to the developer. They should not be spent on purchasing affordable housing on another site which is already secured by a section 106 – e.g. the Council buys a pair of affordable homes being delivered by another developer as part of their policy requirement housing mix. The Council or RP could buy open market plots on new developments, or even existing homes with commuted sums and convert them to affordable housing – however, this is not always the best value for money as the property would be purchased at an open market price, where new affordable homes would generally sell for significantly less. This option is only used where it is not possible to purchase or build new affordable homes within the spending parameters of the S106.

How many affordable housing properties were built in East Suffolk within the last three years?

2.32 22% of all housing completed across East Suffolk between 2020/21-2022/23 is affordable housing (512 of 2,346 homes).

Data on affordable housing completions is published annually in the [Authority Monitoring Report](#) and is available to view on the Planning Policy [Open Data Portal](#).

It should be noted that total completions includes all housing completions, including those on smaller sites where no affordable housing is required.

Net Housing and Affordable housing completion figures for East Suffolk 2022/23

Indicator	Suffolk Coastal Local Plan area	Waveney Local Plan area	East Suffolk
Net additional homes completed	452	360	812

Affordable homes completed (subset of net additional homes completed)	113	42	155
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Suffolk Coastal Local Plan area housing and affordable housing completions over the plan period to date 2018/19-22/23

	2018 /19	2019 /20	2020 /21	2021 /22	2022 /23
Net additional homes completed	588	660	511	499	452
Affordable homes completed (subset of net additional homes completed)	125	197	90	114	113

24% of all housing completed between 2018-22 are affordable homes (639 of 2,710 new homes).

Waveney Local Plan area housing and affordable housing completions over the plan period to date 2014/15-22/23

	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	2022 /23
Net additional homes completed	136	135	264	284	297	156	201	323	360
Affordable homes completed (subset of net additional homes completed)	24	13	88	120	89	25	42	111	42

26% of all housing completed between 2014-22 were affordable housing (554 of 2,156 new homes).

How many times were developers allowed to commute within the last three years? How does this compare to similar and neighbouring authorities?

2.33 The table below sets out each contribution agreed in lieu of on-site affordable housing in S106 Agreements completed from 2020-21 to date in East Suffolk and the reason for the contribution in each instance:

Year of S106	Planning reference	Amount	Reason
2020-21	DC/19/2513/FUL	£375,000	Development site of 11 dwellings
	DC/20/1352/FUL	£50,000	Vacant Building Credit applied and flatted development (on site not appropriate)

	DC/19/3289/OUT	TBC (outline scheme)	Proportionate contribution
2021-22	DC/20/5224/FUL	£37,785	Proportionate contribution
	DC/20/3070/FUL	£13,425	Proportionate contribution
	DC/20/1001/OUT	TBC (outline scheme)	Proportionate contribution
2022-23	DC/21/3016/FUL	£639,952 minimum	Assisted living development and viability (subject to further viability review to determine if additional contribution payable)
2023-24 to date	DC/22/2831/OUT	TBC (outline scheme)	Proportionate contribution
	DC/22/2831/OUT	TBC (outline scheme)	Proportionate contribution
	DC/22/0998/FUL	£85,800	Proportionate contribution
	DC/21/4501/FUL	£230,000	Viability

This information is not readily available in relation to all authorities. In Great Yarmouth, there was one instance in the last three years. Direct comparisons should be treated cautiously due to differences between authorities e.g. numbers of planning applications being determined.

The House Builders' Federation has published research relating to unspent S106 contributions for affordable housing (www.hbf.co.uk/documents/12809/HBF_Unspent_Developer_Contributions_Report_2023.pdf). This shows the local planning authorities with the largest unspent amounts as currently holding between £9.8m and £20.4m, and demonstrates that receipt of commuted sums is a practice that does take place across the country.

Can the Council impose a condition prioritising who receives the affordable housing on a development?

2.34 A planning obligation (Section 106 agreement) will accompany a planning permission involving affordable housing. The Affordable Housing SPD includes model Heads of Terms for S106 agreements, in Appendix 2, and accompanying guidance in Chapter 4. The S106 agreement must follow the Local Connections Cascade. The Local Connections Cascade, set out in Appendix 2 of the SPD, provides a mechanism for allocating affordable housing to people who have a strong local and/or work connection. Note that there is a cascade for rental affordable dwellings and a cascade for affordable dwellings for sale. This will be applied, as appropriate, to affordable housing delivered through a planning obligation. The S106 agreement does not normally prioritise the affordable housing to specific individual(s) but it can be possible to commit certain affordable housing to Key Workers.

A recent example of a Local Connections Cascade in Trimley St Martin is included below. This is typical of cascades used where a local connection to the immediate area is appropriate:

1.1 Affordable Dwellings for Rent

1.1.1 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

- (a) Has continuously lived in Trimley St Martin for the preceding 5 years, OR
- (b) Has continuously had a principal place of work in Trimley St Martin for the preceding 5 years, OR
- (c) Has parents or close family (i.e. mother, father, son or daughter) who are over 18 and who have lived in Trimley St Martin for the preceding 5 years.

1.1.2 If there are no persons who qualify under paragraph 1.1.1 above the Affordable Dwelling shall be allocated to person nominated by the Council who

- (a) Has continuously lived within 10 miles of the Site for the preceding 5 years, OR
- (b) Has continuously had a place of work within 10 miles of the Site for the preceding 5 years, OR
- (c) Has parents or close family (i.e. mother, father, son or daughter) who are over 18 and who have lived within 10 miles of the Site for the preceding 5 years.

1.1.3 If there are no persons who qualify under paragraph 1.1.1 and 1.1.2 above the Affordable Dwelling shall be re-advertised to the district of East Suffolk 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

1.1.4 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 paragraph 1.1.1 or 1.1.2 or 1.1.3 above

1.2 Affordable Dwellings for sale

1.2.1 On advertising the first Disposal of a Shared Ownership Dwelling or First Home the Dwelling shall be marketed for sale for the first 3 months to persons who:

- (a) Have continuously lived within Trimley St Martin for the preceding 5 years, OR
- (b) Have continuously had a principal place of work within Trimley St Martin 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 Trimley St Martin the preceding 5 years.

	<p>1.2.2 PROVIDED THAT if after 2 months of market, no offer has been received from persons who meet the criteria in 1.2.1, then the Dwelling may be Disposed to persons who meet the criteria in 1.2.2.</p> <p>1.2.3 On subsequent Disposals of a Shared Ownership Dwelling or First Home, it shall be marketed for sale for the first 3 months to persons who:</p> <ul style="list-style-type: none"> (a) Have continuously lived within the District of East Suffolk for the preceding 5 years, OR (b) Have continuously had a principal place of work within the District of East Suffolk 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 District of East Suffolk for the preceding 5 years. <p>1.2.4 If there are no purchasers who qualify under paragraph 1.2.1 or 1.2.2 above within 3 months of marketing the Affordable Dwelling it may be sold free of Local Connections restrictions.</p>
	<p>Does East Suffolk work jointly with neighbouring authorities to share skills, exchange information, commission research etc? If not, would there be any benefit in doing so?</p>
2.35	<p>The Strategic Housing Market Assessment was prepared jointly for the Ipswich Housing Market Area which comprises the former Suffolk Coastal district along with Babergh District Council, Mid Suffolk District Council and Ipswich Borough Council. Waveney is its own Housing Market Area; however, the area was also covered as part of the joint commission. This provided a common methodology for the SHMA as well as economies of scale in procuring evidence jointly and for stakeholder engagement.</p>
2.36	<p>The former Suffolk Coastal area is part of the Ipswich Strategic Planning Area (ISPA) (along with Babergh District Council, Mid Suffolk District Council and Ipswich Borough Council). Regular engagement took place through the preparation of the Local Plans of these authorities, including through the ISPA Board who developed and agreed a Statement of Common Ground to set out common approaches to strategic planning matters including housing provision. Continual regular engagement takes place between officers, not only in the ISPA area but also with neighbouring authorities to the north of the district and with authorities across Suffolk and Norfolk, and sometimes wider depending on the issues, on a range of planning matters (not just housing).</p>
	<p>Would it help to develop regional policies such as a spatial plan or a viability protocol?</p>
2.37	<p>Policies related to affordable housing provision are informed by evidence of need and viability within the local area, within the context of the policy set out in the NPPF. As set out in paragraph 2.35 above, the Strategic Housing Market Assessment was prepared jointly for the Housing Market Areas, although identified need figures at each individual local authority level that could be taken forward in respective local plans. ‘Regional’ (e.g. joint) policies on specific affordable housing requirements may not have the same ability to reflect local circumstances (for example, noting the differences set out in paragraph 2.19).</p>

	Any 'regional' protocol on viability may not add anything to the detailed guidance set out in the Local Plans and the Affordable Housing SPD on viability considerations. However, regular engagement with other local planning authorities enables any common matters to be considered, and any potential benefits of joint working to be identified.
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3 How to address current situation

3.1	The Council has up-to-date Local Plan policies and a very recent Affordable Housing SPD, which are performing effectively to achieve good levels of affordable housing delivery. Delivery of affordable housing is kept under regular review and is monitored quarterly through the Council's KPI reporting and also reported annually through the Authority Monitoring Report. Training on affordable housing and viability has recently been provided for Members (in particular of importance for Planning Committee members) to ensure good knowledge and understanding of the policy requirements and how these are implemented, and viability considerations.
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4 Reason/s for recommendation

4.1	This report provides detailed responses and provides evidence in relation to the matters raised in the Scrutiny Committee's questions.
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Appendices

Appendices:

Appendix A	Affordable Housing Supplementary Planning Document (May 2022)
Appendix B	Summary of Developer Responses to Scrutiny Review Consultation

Background reference papers:

Date	Type	Available From
2019	East Suffolk Council – Waveney Local Plan	www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf
2020	East Suffolk Council – Suffolk Coastal Local Plan	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
2019	Waveney Local Plan Inspector's Report	www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Inspectors-Report-and-Schedule-of-Modifications.pdf
2020	Suffolk Coastal Local Plan Inspector's Report	www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Suffolk-Coastal-Local-Plan-Inspectors-Report.pdf

2023	National Planning Policy Framework	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF Sept 23.pdf
2018	National Planning Policy Framework (Superseded)	https://webarchive.nationalarchives.gov.uk/ukgwa/20181210013535mp_/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National Planning Policy Framework web accessible version.pdf
2012	National Planning Policy Framework (Superseded)	https://webarchive.nationalarchives.gov.uk/ukgwa/20180610005038mp_/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
2021 (last updated)	Planning Practice Guidance – Housing Needs of Different Groups	www.gov.uk/guidance/housing-needs-of-different-groups
2018 (last updated)	Planning Practice Guidance – Build to Rent	www.gov.uk/guidance/build-to-rent
2021 (last updated)	Planning Practice Guidance – First Homes	www.gov.uk/guidance/first-homes
2019 (last updated)	Planning Practice Guidance – Viability	www.gov.uk/guidance/viability
2017	Ipswich and Waveney Housing Market Areas – Strategic Housing Market Assessment (Volume 2)	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
2019	Ipswich and Waveney Housing Market Areas – Strategic Housing Market Assessment (Volume 2 – Partial Update)	www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/SHMA-Part-2-update-2019.pdf
2022	Affordable Housing Supplementary Planning Document – Consultation Statement	www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Affordable-Housing/Consultation-Statement-April-2022.pdf
2021	East Suffolk Statement of Community Involvement	www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf
2023	East Suffolk Affordable Housing Commuted Payment Schedule	www.eastsuffolk.gov.uk/assets/Planning/Section-106/East-Suffolk-Affordable-Housing-Commuted-Payment-Schedule.pdf
2023	East Suffolk Community Infrastructure Levy Charging Schedule	www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-rates/approved-cil-rates-for-the-east-suffolk-area/

2022	East Suffolk Authority Monitoring Report	www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/
Various	East Suffolk Planning Policy Open Data Portal	https://data-eastsuffolk.opendata.arcgis.com/
2023	Section 106 Agreements and unspent developer contributions in England and Wales (Home Builders Federation)	www.hbf.co.uk/documents/12809/HBF_Unspent_Developer_Contributions_Report_2023.pdf
2021	Ipswich Strategic Planning Area – Statement of Common Ground (Version 7)	www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ispa_statement_of_common_ground_v7_march_2021_final_signed.pdf