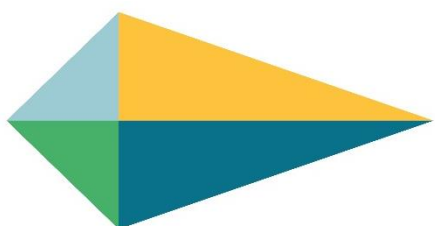


Consultation Statement

Custom and Self-build Housing
Supplementary Planning Document

May 2024



EASTSUFFOLK
COUNCIL

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1 Introduction

The Custom and Self-Build Housing Supplementary Planning Document (SPD) explains what custom and self-build housing is and importantly what it isn't, as well as demonstrates the range of delivery models that meet the legal definition of custom and self-build housing. This will help support policies in our existing Local Plans.

This Consultation Statement was produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and outlines the responses submitted to the initial consultation (held between 1 February and 16 March 2023) and the formal consultation (held between 6 September and 18 October 2023) undertaken to inform the preparation of the SPD.

The Council's approach to engagement in the preparation of a Supplementary Planning Document is set out in the Statement of Community Involvement¹.

Consultation on the Custom and Self-build Housing SPD was split into two stages: an initial stage that informed the scope and content of the SPD, and a formal stage of consultation that sought views on the draft SPD.

Initial consultation

The initial consultation sought views on the broad scope and content of the SPD, and comprised a short initial consultation document with links to an online questionnaire, which included the following questions:

- 1) Do you consider the proposed content of the SPD to be appropriate?
- 2) Are there any specific elements of the Local Plan policies that you consider require additional guidance in the SPD?
- 3) Are there any elements of national policy on custom and self-build housing that you consider require additional guidance in the SPD?
- 4) Are you aware of any good practice in existing SPDs from elsewhere that could be applied in East Suffolk?
- 5) Are you aware of any good custom and self-build housing developments?
- 6) Do you have any other comments for us to consider in drafting the SPD?

In addition to the questionnaire, six workshops were held. The purpose of the workshops was to enable a conversation and dialogue between those interested in custom and self-build housing and the Council, as well as to help inform consultation responses. Three

¹ How to get Involved in Local Planning – Statement of Community Involvement (April 2021)

workshops were held for individuals and groups signed up to the Council’s Custom and Self-Build Housing Register, and three were for architects, developers, planning consultants, and registered providers. The workshops were split between these groups due to the different information that such groups might be seeking and the times of day that they may be available to attend workshops. Those signed up to the register may only be able to attend workshops outside of standard working hours. For this reason, the three workshops for custom and self-build registrants were held at the following times:

- Tuesday 7 March 2023, 12:30-13:30
- Tuesday 7 March 2023, 17:00-18:00
- Thursday 9 March 2023, 17:00-18:00

Workshops for architects, developers, planning consultants, and registered providers were held during standard working hours:

- Tuesday 28 February 2023, 09:30-10:30
- Thursday 2 March 2023, 15:00-16:00
- Thursday 9 March 2023, 14:00-15:00

The workshops were held virtually using MS Teams and lasted an hour. The workshops were structured around a presentation about custom and self-build housing and the proposed supplementary planning document, followed by questions and answers in a round table format.

The workshops were positively received and considered useful for the Council and participants. A summary of the comments received during the workshops, and the ESC response to the comments is below.

Summary of main issues	Council response
Guidance regarding the appropriate format of planning applications for, and with an element of, custom and self-build housing would be helpful. Design codes and plot passports should be a reserved matter and not sought to be addressed at the outline application stage.	The draft SPD includes an appendix detailing the recommended format of planning applications for different types of custom and self-build housing delivery models.
It would be useful if the Council’s custom and self-build register could be highlighted in the document to increase awareness.	The Council’s Custom and Self-build Housing Register is referenced in the draft SPD, with a link to further information held on the Council’s website.

<p>Case studies of successful custom and self-build developments would help developers understand how best to plan for custom and self-build housing.</p>	<p>Case studies have been included in the draft SPD.</p>
<p>Custom and self-build on larger developer sites can take longer to deliver than the developer's own housing due to the individual nature of the design process and less experienced individuals carrying out the design, planning, and build processes. 2-3 years is not enough time. Delivery timescales set out in planning conditions need to reflect this.</p>	<p>The longer delivery timescales for custom and self-build housing compared to other forms of housing is recognised in the draft SPD through the inclusion of model conditions and s106 agreements.</p>
<p>Careful consideration is required of health and safety issues in relation to custom and self-builders and contractors on the same site as other market housebuilders and contractors. Custom and self-build elements on a larger developer site should be identified as a distinct phase, and located on the edge of developments to help prevent health and safety issues. However, it was noted that custom and self-build on the edge of developments could be challenging to secure due to potential impacts of innovative house designs on adjoining development and/or countryside.</p>	<p>The Council acknowledges the health and safety challenges of different organisations and self-builders interacting on the same site in a health and safety complaint manner. The draft SPD provides potential solutions to deal with health and safety matters from a design and planning perspective.</p>
<p>Guidance regarding what is and what is not custom and self-build housing would be useful, particularly in relation to kit and modular homes.</p>	<p>The draft SPD includes guidance on the custom and self-build housing legal definition and the various delivery models.</p>
<p>Guidance regarding the phasing of custom and self-build on larger developer sites would be useful, noting the number of market homes delivered before serviced custom and self-build plots become available.</p>	<p>Phasing and trigger points are addressed in the draft SPD.</p>

<p>Completion notices should be included within the SPD to help avoid overly prolonged delivery, and plots lying vacant.</p>	<p>The Council expects custom and self-builders to take longer than developers to build homes, however due to the significant financial outlay involved custom and self-builders will no doubt be keen to complete the build as soon as possible.</p>
<p>Guidance on appropriate layout of custom and self-build homes on larger developer sites would be useful.</p>	<p>The draft SPD addresses design, including layout.</p>
<p>During construction, guidance on self-builders living in caravans and other similar structures on custom and self-build plots would be useful.</p>	<p>It would be expected that design codes address the acceptability of caravans and other similar living accommodation sited on plot during construction.</p>
<p>Custom and self-build housing should be more affordable than market housing, e.g. through a variety of plot sizes including some smaller plots at lower prices.</p>	<p>The draft SPD expects a variety of plot sizes to be provided to meet the needs of a range of households with a range of budgets.</p>
<p>It was suggested that the SPD address community/group approaches to custom and self-build housing, and the possibility of helping to facilitate group self-build projects.</p>	<p>The draft SPD addresses group custom and self-build housing.</p>
<p>It was suggested that the SPD include guidance to encourage developers to share their evidence based documents and plans with custom and self-builders to avoid unnecessary duplication of assessments, and to ensure potential purchasers have all the relevant information available before purchasing a serviced plot.</p>	<p>The draft SPD includes an expectation that surveys conducted by the site wide applicant should be made available to plot purchasers. Information about accessing such surveys will be expected to be provided on the plot passport.</p>
<p>Guidance on the consideration of energy efficiency and renewable energy measures (e.g. solar panels) in design codes would be useful.</p>	<p>The draft SPD doesn't provide guidance on renewable energy measures. The design code prepared for a custom and self-build development should consider providing design parameters on renewable energy. The draft SPD also includes a link to the Council's adopted Sustainable Construction SPD.</p>

<p>Clear illustrations relating to design consideration would be helpful.</p>	<p>The draft SPD includes a number of clear illustrations to aid understanding, and design codes prepared for custom and self-build housing should also provide clear illustrations.</p>
<p>It will be important for potential plot purchasers to have certainty as to what they can and cannot do with a plot before purchase.</p>	<p>It will be essential that potential plot purchasers understand what they can and cannot build on a given plot. The draft SPD sets clear expectation as to what design codes and plot passports should include.</p>

A summary of the main issues raised through the questionnaire responses during the initial consultation:

- Custom and self-build housing should be clearly defined.
- Health and safety, and construction management must be carefully managed.
- Innovative and modern custom and self-build housing design should be supported.
- There is a common desire for custom and self-build housing to achieve high environmental standards.
- Custom and self-build housing should be supported on a wider range of sites than as a percentage of large developer sites.
- The self-build Community Infrastructure Levy exemption process should be clearly explained.
- A range of custom and self-build developments were proposed as good practice.

The Council’s response to each questionnaire response submitted through the initial consultation, alongside details of how such responses informed the preparation of the SPD are provided in Appendix 1.

Formal consultation

After consideration of each of the consultation responses submitted through the initial consultation, the Council prepared the draft SPD. Responses to the SPD through the formal consultation could be made online, by email, or by post.

A summary of the main issues raised through the formal consultation:

- Some confusion over the origin of the self-build exemption from Community Infrastructure Levy (CIL).
- Responses highlighted a spectrum of views on the design freedom afforded to initial occupants. Some suggest design freedom should be limited, others suggest it should be maximised.
- Useful clarification of desired approach to affordable housing.

- Developers sought for the marketing arrangements to be applied flexibly (e.g. commencement of minimum 12-month marketing period, number of plots within a cluster).
- Support for the model conditions and s106 obligations, however the consistency of expectations between conditions and s106 obligations should be reviewed.

The Council's response to each consultation response submitted through the formal consultation, alongside details of how such responses resulted in changes to the SPD, are provided in Appendix 6.

2. Who was consulted?

Consultation on the Custom and Self-build Housing SPD was split into two stages: an initial stage that informed the scope and content of the SPD, and a formal stage of consultation that sought views on the draft SPD.

The groups and organisations consulted as part of the initial consultation are set out in Appendix 2, and those consulted as part of the formal consultation are set out in Appendix 4.

Both the initial and formal consultations were also made available to the public on the Council's website.

3. How were they consulted?

Initial consultation

The initial consultation ran from 1st February to 16th March 2023 and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/CSBSPDINT>

The consultation was advertised on the Council's website, as well as on social media (see Appendix 3). 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.

In total 40 individuals and organisations responded to the consultation. Between them they made 144 comments.

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

<https://eastsuffolk.inconsult.uk/CSBSPDINT/listRespondents>

Formal consultation

The formal consultation ran from 6th September to 18th October 2023 and the consultation documents were made available on the East Suffolk Council website via the pages below:

<https://eastsuffolk.inconsult.uk/CSB0823DRAFT/consultationHome>

The consultation was advertised on the Council's website, as well as on social media (see Appendix 5). The organisations referred to above were notified directly by email or post.

Hard copies of the document were also made available for inspection at all libraries in the district and the Council's Customer Service Centres at The Marine Centre, Lowestoft, and in the Felixstowe and Woodbridge libraries.

In total 21 individuals and organisations responded to the consultation. Between them they made 71 comments.

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

<https://eastsuffolk.inconsult.uk/CSB0823DRAFT/listRespondents>

Appendix 1: Initial Consultation Responses

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

Question 1 Do you consider the proposed content of the SPD to be appropriate?

Respondent Name	Comment ID	Comment	Council Response	Change Made
Marinus Scheijde	1136750	Yes The whole idea is totally impractical. There’s no way that this can be managed from a health & safety point of view on a fast moving development. From my experience of self build projects, most of them run on for years and it would just leave a blot on the landscape, where all other properties would be finished off in the street around it. In my opinion the only sensible approach would be to have the developer/ builder have a system which could offer alternative internal layout options within the footprint. This would at least allow safe management of the build, including external finishes such as drainage/ driveway, at which time the project could possibly be handed over and be finished by a purchaser internally.	Custom and self-build homes on larger residential and mixed-use developments is a nationally practiced approach consistent with adopted development plan policies that identify a percentage of dwellings for custom and self-build housing. Such approaches have been successfully delivered across the country. However, health and safety must be effectively managed.	The draft SPD addresses construction management and health and safety through careful consideration of layout, access, and phasing.
Andrew Brown	1136754	No	Comment noted	No change
John Bailey	1136756	Yes	Comment noted	No change
Stephen Holliday	1136779	Yes	Comment noted	No change
Coyne Environmental (Kenneth Coyne)	1136805	Yes	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
John Self	1136815	No I registered my interest with you shortly after the introduction of the Self-Build and Custom Housebuilding Act 2015. You have occasionally sent me 'opportunities' which have almost exclusively been for tracts of land already with planning permission by the usual major players in housebuilding. I recently tried to get planning permission on a vacant plot owned by ESC that was refused on various grounds: too modern, inappropriate construction method (!) for the site, etc. It's a widespread view that planning departments are intransigent or just obstructive - it's so easy to say no. Open up the scope for modern designs otherwise if you always do what you've always done, you'll always get the same turgid designs. The Planning Department has allowed the SOS, same old stuff, to be built over the years - see any Hopkins Homes, Badger Homes houses. You should be demanding innovation; I see none.	Given that one of the primary reasons individuals seek to build or commission their own home is that it provides them with an opportunity to design a home that is perhaps not readily available on the open market, it is important that custom and self-build housing proposals are able to design modern or innovative homes.	The draft SPD seeks to facilitate as much design freedom as reasonably possible. The draft SPD sets out that design codes should only restrict design freedom where demonstrably necessary. Determining whether it will be demonstrably necessary to restrict design freedom will often depend on the site context.
Keith Pierce	1136831	No It is not ambitious enough. There is good demand for "Off Grid" living and the SPD does not seem to address this aspect. One Planet Development projects, with the support of the Welsh government, have proven this approach to be hugely successful and Suffolk should consider becoming the first county in England to take on this approach. The SPD also only seems to be considering single self build opportunities, it should consider provision for groups wishing to self build within a rural setting, sustainably off grid.	The draft SPD addresses the whole spectrum of possible custom and self-build housing projects, including single self-build projects through to larger group custom and self-build projects. The draft SPD does not address off grid living, although does link to the Council's adopted Sustainable Construction SPD.	No change
David Barefoot	1136925	Yes	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Bromeswell Parish Council (Verity Brown)	1137136	Yes	Comment noted	No change
Thomas Bury	1137961	Yes	Comment noted	No change
Neil Brooks	1138112	<p>Don't Know</p> <p>It would be useful to have a section detailing the attitude of the Local Authority to the provision of Solar panels on new buildings - in my view it should be encouraged, and no obstacles put in place on account of aesthetics. Nationally provision of solar panels on new building should be made mandatory as far as is possible.</p> <p>IT would also be useful to have a section dealing with the attitude of the local authority to both air source and ground source heat pumps for heating new builds.</p>	<p>The draft SPD does not include guidance regarding the suitability of solar panels, heat pumps, or any other form of energy generation technology. The Council's adopted Sustainable Construction SPD provides useful guidance and has been referenced within the draft SPD.</p> <p>However, the draft SPD seeks to facilitate as much design freedom as reasonably possible. The draft SPD sets out that design codes should only restrict design freedom where demonstrably necessary. Determining whether it will be demonstrably necessary to restrict design freedom will often depend on the site context.</p>	No change
Fiona Ryder	1138775	No I appreciate that most of the comments below relate to a potential change in policy for Self Build and Custom	As noted at the beginning of the respondent's comment, these matters relate to policy changes, which cannot be addressed	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>Housing, but this seemed like the best place to include them.</p> <ol style="list-style-type: none"> 1. To include exception sites within the scope of the SPD for self builders- as long as these are well located to existing settlements and have easy access to services. 2. If point 1 above is adopted there should be a requirement that self builders retain ownership/ remain resident in the properties they design and build for a minimum period. This would help ensure that any sites that secure planning for a self build project are only used for that purpose. 3. I appreciate that there is some scope to allow affordable self build homes, but this is not well defined within the SPD or indeed the local plan and is restrictive in its current drafting. Most self builders want to build a better or more appropriate house than they could afford to buy. By their very nature, self build projects provide more affordable homes for those that undertake the projects, This is not about owner/ occupiers developing and selling on for profit within a short time scale. This is definitely about enabling people to build homes for themselves and their families. 4. I believe that challenging sites in close proximity to existing settlements could be used for self-build projects. Most self builders would undertake to incorporate mitigants into any self build design scheme to enable under utilised land to be used for building single homes. This might include small areas of brownfield land - perhaps land 	<p>through the Supplementary Planning Document. These matters however can be considered through the review of the Local Plans for East Suffolk.</p> <p>In relation to point 3 concerning affordable housing, the draft SPD provides guidance about affordable custom and self-build housing and ways in which market custom and self-build housing can be made more affordable, through for example providing a range of plot sizes to meet the needs of a range of households.</p> <p>The point that custom and self-build homes can also potentially be a less expensive form of housing through sweat equity is also reflected in the draft SPD.</p> <p>In relation to point 5, there will be those that do not want a serviced plot on a larger housing development. However, there will be others that will be perfectly content with such a plot. Through the Local Plan policies it is the Council's</p>	

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>that a developer would avoid or land which may be subject to zone 2 flood risk, which might be useable if the building was elevated. It seems to me that we don't champion self builders sufficiently to help use land that is otherwise 'wasted' Given the housing crisis and the acute shortage of affordable land for self builders, this seems to me to be a very logical suggestion.</p> <p>5. I don't believe that including plots for self build development within housing 'estates' is a helpful addendum to your self-build policy. The size of these plots fall well below what most self builders are looking for. Developers are only focused on profit - whereas self builders focus on building appropriate homes within existing communities for themselves and their families. There is a conflict between these two groups of people.</p>	intention to support custom and self-build housing in a range of delivery models, including on larger residential or mixed use sites.	
Caroline Kilbride	1138794	Don't Know	Comment noted	No change
Melton Parish Council (Pip Alder)	1139199	<p>No</p> <p>It would be very useful to include a clear definition of what constitutes custom and self build. Applications for self build that we have seen are invariably from builders rather than individuals and seen as a way to avoid paying any CIL.</p>	The draft SPD includes guidance as to the various different custom and self-build housing delivery models that meet the custom and self-build housing legal definition.	No change
Felixstowe Town Council (Ash Tadjrishi)	1139646	<p>Yes</p> <p>The Town Council welcomed the Initial Consultation on the Custom and Self-Build Housing Supplementary Planning Document and felt the scope to be thorough and comprehensive. That it was easy to read and most importantly covers all possible areas that a potential reader would expect to see. The Town Council very much</p>	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		welcomed the potential SPD as it deals with an important aspect of the Local Plan.		
Mr Farrow	1139763	Don't Know	Comment noted	No change
LIVEDIN (Charlie de Bono)	1141264	<p>Don't Know</p> <p>"its very geared to self build as delivered on Percentage Policy sites.</p> <p>Self build is its own sector and is supposed to be a diversification of the housing market so procuring via strategic sites is the opposite of the intention and the opposite of what self builders are looking for.</p> <p>This collision of 2 different approaches on one site creates lots of problems in terms of planning, demand, delivery and marketing.</p> <p>The SPD can try address these but conceptually it would be better to make % policy an opt in policy rather than obligatory. and then developer who want to do self build will include and probably have a successful delivery route.</p> <p>Those that don't want to should not be forced as reluctant developers are unlikely to create positive results."</p>	The SPD cannot amend or revoke the planning policies adopted in the Council's two local plans.	No change
Amy Felton	1142133	<p>No</p> <p>The SPD doesn't really show any information for people who wish to build a small off grid home on land they already own. It seems to be aimed at companies who want to build multiple homes for selling on.</p>	The draft SPD provides guidance relevant to single self-build developments as well as large multi plot custom and self-build developments.	No change
Charsfield Parish Council (Pamela Hembra)	1142465	Yes	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Karen King	1142639	Yes	Comment noted	No change
julia denny	1143363	No i think most people who want to self-build would not want to be part of a large development, so an allocation in developments greater than 100 houses would not be very appealing to most. The reasons for self build include having a plot that is larger than most standard housing developments would offer, having a certain amount of freedom with the design and layout, being able to design for individual needs eg. an accessible home or including a granny annex, etc. Also most people would hope to save money by not having to pay the developer's profit. It would be better to have a greater allocation of plots for self or custom build within smaller developments and groups of house.	Those wishing to build or commission their own home will want to maximise the level of design customisation available to them, including through the size of plots. The Council requires that proposals for five or more custom and self-build dwellings be accompanied by a design code. The draft SPD expects design codes to provide a range of plot sizes to meet a range of needs and demands. The 5% custom and self-build dwelling policy is set out in the Council's two adopted Local Plans, and cannot be amended or revoked by the SPD. The Council will consider how best to support custom and self-build housing through a review of the two Local Plans.	The draft SPD expects design codes to provide a range of plot sizes to meet a range of needs and demands.
Bromeswell Parish Council (Verity Brown)	1143375	Yes	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Alan Ambrose	1143679	No "I have found it difficult to answer this 'consultation' as it's not obvious what your objectives are here: to help self-builders? (it doesn't really), to fill a paperwork requirement for a 'consultation' on 'self-build policy'? (probably anything will do)."	Comment noted	No change
Pigeon Investment Management Ltd (Fillmore, Andrew)	1143979	Yes Yes, we consider the content of the SPD appropriate.	Comment noted	No change
Hopkins Homes	1144071	Whilst the elements proposed to be covered by the SPD appear appropriate, more consideration needs to be given to the proposed timescales for the delivery of and subsequent construction upon any self-build plots proposed as part of a larger development, given the practical, legal and health and safety implications involved.	The draft SPD recognises that custom and self-build housing usually takes longer to deliver than developer homes. The draft SPD also sets out ways of addressing health and safety on larger developer sites through careful consideration of layout and access in particular.	The draft SPD sets out ways of addressing health and safety on larger developer sites through careful consideration of layout and access in particular.
Clayland Architects (Victoria Corbett)	1144081	Yes	Comment noted	No change

Question 2 Are there any specific elements of the Local Plan policies that you consider require additional guidance in the SPD?

Respondent Name	Comment ID	Comment	Council Response	Change Made
Marinus Scheijde	1136750	Yes Where and how to find suitable plots before developers do.	When custom and self-build plots are available to purchase they are published on the Council website (https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/self-build-and-custom-build/). This information is publicly available, but those registered on the Council's Custom and Self-Build Housing register also receive a notification whenever the webpage is updated with new opportunities.	No change
Andrew Brown	1136754	Yes Further public consultations	After analysing the consultation responses and drafting the draft SPD, the further consultation takes place seeking feedback on the content of the draft SPD.	No change
John Bailey	1136756	Yes There is no mention in the SPD of the sizing of self-build plots. It is likely that a range of sizes will be desired by self-builders, and probable that some self-build plots will need to be significantly larger than custom-build plots. As you've reported in your own document, most self-builders want to live in the countryside or small villages - the 5% custom-build model within developments of 100+ units won't be of interest to the majority of those people.	Those wishing to build or commission their own home will want to maximise the level of design customisation available to them, including through the size of plots. The Council requires that proposals for five or more custom and self-build dwellings be accompanied by a design code. The draft SPD expects a variety of plot sizes to be provided to help meet a range of needs and demands. The 5% custom and self-build dwelling policy is set out in the Council's two adopted Local Plans, and cannot be amended or revoked by the SPD. The Council will consider how best to support custom and self-build housing through a review of the two Local Plans.	The draft SPD expects a variety of plot sizes to be provided to help meet a range of needs and demands.
Stephen Holliday	1136779	Yes Give greater encouragement - and prioritise - self builds which meet high environmental/sustainability standards.	There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of enabling design freedom and only restricting design freedom where demonstrably necessary. The draft SPD includes	The draft SPD highlights the importance of enabling design freedom and only

Respondent Name	Comment ID	Comment	Council Response	Change Made
			reference to the Council’s adopted Sustainable Construction SPD.	restricting design freedom where demonstrably necessary. The draft SPD includes reference to the Council’s adopted Sustainable Construction SPD.
Coyne Environmental (Kenneth Coyne)	1136805	Yes Any proposals should be of sustainable design taking into account the environment and produce a benefit to the local ecology and improved biodiversity for wildlife	There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of enabling design freedom and only restricting design freedom where demonstrably necessary. The draft SPD includes reference to the Council’s adopted Sustainable Construction SPD.	The draft SPD highlights the importance of enabling design freedom and only restricting design freedom where demonstrably necessary. The draft SPD includes reference to the Council’s adopted Sustainable Construction SPD.
John Self	1136815	Yes Strict review of major housebuilders designs to reject normal conveyor belt houses. Insist on innovation.	Of paramount importance in the provision of custom and self-build housing is that initial occupants have a primary input into the design and layout of the home. The draft SPD highlights the importance of enabling design freedom and only restricting design freedom where demonstrably necessary. The draft SPD includes reference to the Council’s adopted Sustainable Construction SPD.	The draft SPD highlights the importance of enabling design freedom and only restricting design freedom where demonstrably

Respondent Name	Comment ID	Comment	Council Response	Change Made
				necessary. The draft SPD includes reference to the Council's adopted Sustainable Construction SPD.
Keith Pierce	1136831	Yes Provision for greenfield sites to be made available for individuals and groups wishing to start new communities.	Our Local Plan policies on custom and self-build housing support and encourage the provision of custom and self-build housing on standalone sites and as part of larger mixed use and residential developments.	No change
David Barefoot	1136925	No	Comment noted	No change
Bromeswell Parish Council (Verity Brown)	1137136	No	Comment noted	No change
Suffolk County Council Archaeological Service (Rachael Abraham)	1137459	Yes In relation to question 2, we would however suggest that the section on Phasing (addressing where custom and self-build housing comprises part of a major development site) flags that these types of development need to take place in line with the wider archaeological strategies for the projects in question/the relevant Local Plan policies relating to archaeology.	The draft SPD makes clear that site wide requirements (e.g. archaeology, drainage, access) are dealt with on a site wide basis and not left to individual plot purchasers to resolve.	The draft SPD makes clear that site wide requirements (e.g. archaeology, drainage, access) are dealt with on a site wide basis and not left to individual plot purchasers to resolve.
Thomas Bury	1137961	No	Comment noted	No change
Neil Brooks	1138112	Yes See above	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Fiona Ryder	1138775	<p>Yes</p> <p>Please see the comments above, especially in relation to affordable self build. I disagree with the statement that "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)".</p> <p>If under utilised 'exception sites' were included in your local plan, the cost of the land purchase would be reduced, thereby achieving improved 'affordability' for custom / self builders as long as there is a commitment to occupy the house for a minimum period of time.</p>	<p>Affordable housing is defined in the National Planning Policy Framework (2021, Glossary). This must be understood as distinctly separate to making savings through for example sweat equity. The draft SPD makes clear however that sweat equity can provide an important mechanism for households to save money. Custom and self-build housing can play a role in both legally defined affordable housing and making market housing more affordable.</p> <p>The SPD cannot amend Local Plan policy. As and when a Local Plan review is undertaken, consideration will be given to how best to support custom and self-build housing.</p>	The draft SPD addresses both policy defined (NPPF) affordable housing, and forms of custom and self-build housing where money can be saved (e.g. sweat equity).
Caroline Kilbride	1138794	Don't Know	Comment noted	No change
Melton Parish Council (Pip Alder)	1139199	No	Comment noted	No change
Mr Farrow	1139763	<p>Yes</p> <p>Should favour people with a local connection and perhaps even have a clause about selling to people with a local connection for say the first 20years. This is to avoid outside wealth taking</p>	The SPD cannot introduce a local connection test in relation to the sale of land for custom and self-build housing.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		opportunities from locals and help keep the cost of land down.		
LIVEDIN (Charlie de Bono)	1141264	<p>Yes</p> <p>"Large sites: Self build needs separate policies - rather than being procured via large developer sites.</p> <p>Very small sites: (3-5) WLP8.7 and SCLP5.4 are positive - though not specifically for CSB.</p> <p>Other than these - how else can self build be brought forward? 100% CSB allocations? how about sites of 5-10?"</p>	The SPD cannot amend or revoke the planning policies adopted in the Council's two local plans.	No change
Amy Felton	1142133	<p>Yes</p> <p>Guidance on self builds for individuals who want to build and live in an off grid, eco friendly home. Homes that will be low impact on the environment and use green energy and water capture.</p>	There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.	The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.

Respondent Name	Comment ID	Comment	Council Response	Change Made
Charsfield Parish Council (Pamela Hembra)	1142465	No	Comment noted	No change
Karen King	1142639	No	Comment noted	No change
julia denny	1143363	smaller groups of houses may also allow more shop for individual style and design, most large housing developments just seem to have half a dozen or so different house types, so a few token self builds may either be very restricted in design or look out of place within the uniformity of the development. The design guidance could be more flexible in smaller clusters.	Those wishing to build or commission their own home will want to maximise the level of design customisation available to them. The draft SPD makes clear that design freedom should only be restricted where demonstrably necessary. The intention is to support innovative, modern, and sustainable design choices.	No change
Bromeswell Parish Council (Verity Brown)	1143375	No	Comment noted	No change
Alan Ambrose	1143679	No	Comment noted	No change
Pigeon Investment Management Ltd (Fillmore, Andrew)	1143979	No No, as set out above the content of the SPD is considered appropriate and no additional guidance is necessary.	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Hopkins Homes	1144071	<p>As indicated above, more consideration needs to be given to the proposed timescales for the delivery of and subsequent construction upon any self-build plots, given the practical, legal and health and safety implications involved.</p> <p>Whilst Policies SCLP5.9/ WLP8.3 suggest the requirement for a 12-month marketing period from the time the Plots are serviced, we consider this timescale to be wholly excessive. Such a long timeframe for marketing, followed by any formal submission and subsequent approval of Reserved Matters applications for individual self-build plots, is likely to result in substantial elements of the main development being completed, sold and occupied.</p> <p>The timescales being suggested would cause additional inconvenience for any new residents and also will delay the formal adoption process for roads, footways, etc. which cannot be completed until at least a year after the whole of the development is fully completed.</p> <p>The New Homes Quality Code requires all major developers to provide new home buyers pre-purchase information including</p>	<p>The draft SPD recognises that custom and self-build housing usually takes longer to deliver than developer homes. The model conditions provided reflect this. The draft SPD also sets out ways of addressing health and safety on larger developer sites through careful consideration of layout and access in particular.</p> <p>The required 12-month marketing period is a minimum period consistent with the Council’s marketing guidance set out in Appendices E and 4 of the Suffolk Coastal and Waveney Local Plans, respectively. The Council’s sees no compelling reason for a different minimum marketing period. Developers can mitigate any issues by bringing forward the servicing and marketing of plots in their phasing plans. Plots could of course be marketed before they are available for immediate purchase, however this would not alter the minimum 12-month period.</p> <p>The inconvenience to residents of ongoing construction works would be no different to a development on the edge of an existing settlement.</p> <p>The New Homes Quality Code (December 2021) requires information is provided to the potential home purchaser about the home which is being purchased (e.g. section</p>	<p>The draft SPD sets out ways of addressing health and safety on larger developer sites through careful consideration of layout and access in particular.</p>

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>certainly about the finished development, street scene and external visual appearance of dwellings. Upon handover of a dwelling, the new home buyer has to be advised of any outstanding works to other areas of development in the vicinity of their new property and a timescale for when the work is expected to be completed. Clearly any elongated timescales for the known delivery of any such neighbouring self-build plots will make compliance with the Code requirements difficult, if not impossible to achieve.</p> <p>In order to try and address such issues, it is suggested that self-build plots should be able to be marketed 'Off-Plan' for a period of at least 6 months before the plots will physically become available, in order to provide sufficient time for any such self-build plot purchasers to draw up detailed dwelling designs and subsequently submit Reserved Matters applications, such that once the plots are physically delivered, the respective self-build development could then start ?</p> <p>Alongside such practical timing issues, the overall health & safety issue of a number of different contractors working on the</p>	<p>2.2h)). It does not require detailed information about the external appearance of any other homes on the development. Notwithstanding this, the design code would provide a degree of certainty about the design of each custom and self-build home.</p> <p>In relation to delivery timescales, it is clear from section 2.6iv) of the New Homes Quality Code that details of future phases of development in the vicinity of the home are only required to be provided where such information is available. Such information would be available from the relevant reserved matters permission for each plot. Prior to reserved matters permissions on relevant plots the developer could provide indicative timescales aligned with the model conditions for the commencement of custom and self-build homes set out in the draft SPD. Section 2.12 of the New Homes Quality Code specifies that timescales for any future phases could be indicative. In order to provide more certainty to home buyers developers may decide to bring custom and self-build elements of the development earlier in the phasing. Servicing and marketing earlier in the process would provide more certainty for home buyers as to the likely design of custom and self-build homes.</p> <p>It is of course possible for custom and self-build plots to be marketed before they are available for immediate purchase, and this will no doubt speed up delivery. However, this will not trigger the minimum 12-month marketing period.</p>	

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>site, on behalf of different clients, requires careful practical and legal consideration.</p> <p>Under normal circumstances, the main Developer of any major residential development site will have sought approval for a detailed Construction Management Plan, which would detail the proposed working & delivery hours, build-out programmes, contractor parking arrangements, construction traffic routes, noise & dust control measures, etc. Such details would also be provided to the Health & Safety Executive.</p> <p>Clearly, the involvement of a number of additional, third-party contractors will result in a higher degree of general health & safety risk, particularly when timescales and legal responsibilities for their actions and involvements remain unknown at the outset.</p>	<p>The health and safety of everyone on site is of course of paramount importance, and must be robustly addressed. The draft SPD sets out how health and safety can be addressed, with particular attention paid to layout and access from the outset.</p>	
Clayland Architects (Victoria Corbett)	1144081	No	Comment noted	No change

Question 3 Are there any elements of national policy on custom and self-build housing that you consider require additional guidance in the SPD?

Respondent Name	Comment ID	Comment	Council Response	Change Made
Marinus Scheijde	1136750	No	Comment noted	No change
Andrew Brown	1136754	Yes As previously mentioned	Comment noted	No change
John Bailey	1136756	Don't Know	Comment noted	No change
Stephen Holliday	1136779	Don't Know	Comment noted	No change
Coyne Environmental (Kenneth Coyne)	1136805	Yes A high proportion of the population is retired and require suitable housing in the form of single storey dwellings but as part of mixed community living , not all together bungalows	Our Local Plan policies seek to achieve a range of plot/dwelling sizes to help meet the needs of the whole population. Bungalows and accessible dwellings are an important part of the wider mix, and as is noted by the respondent, must be designed as part of a wider community that helps maximise incidental social interaction.	No change
John Self	1136815	Yes Open up more plots for interested custom builders, serviced or not.	Our Local Plan policies seek to support the delivery of custom and self-build plots. The SPD cannot create, amend, or revoke planning policies, that is the role of the development plan.	No change
Keith Pierce	1136831	Yes Work in conjunction with specialist SIPs house builders to provide self build kits for affordable, self build housing schemes.	The draft SPD does not prescribe construction techniques or materials, and so Structural Insulated Panels (SIPs) may be acceptable on a case by case basis.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
David Barefoot	1136925	Yes Energy saving and solar energy	There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.	The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.
Bromeswell Parish Council (Verity Brown)	1137136	No	Comment noted	No change
Thomas Bury	1137961	No	Comment noted	No change
Neil Brooks	1138112	Don't Know	Comment noted	No change
Fiona Ryder	1138775	Don't Know See comments above	Comment noted	No change
Caroline Kilbride	1138794	Don't Know	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Melton Parish Council (Pip Alder)	1139199	Yes Why self build is exempt from any CIL charges. Any development brings an impact on infrastructure so therefore a contribution should be made.	The Council will provide guidance on the self-build exemption from Community Infrastructure Levy (CIL). While it is correct that all residential development will have an impact on infrastructure, the Council cannot revoke the CIL exemption as it is set out in law.	The draft SPD provides guidance on the implementation of the self-build CIL exemption.
Mr Farrow	1139763	Again there should be an incentive for smaller family homes rather than larger indulgent home. I wouldn't want to stop oversized houses but there should be a mechanism to make such a choice less desirable.	Custom and self-build housing developments are subject to the same housing mix policies as other residential development proposals. These housing mix policies have been evidenced by Strategic Housing Market Assessments, which quantify the need for different sizes of homes. The housing mix policies are therefore a reflection of the need for different sizes of homes. The draft SPD identifies the expectation that custom and self-build housing developments provide a range of plot sizes to meet a range of needs and demands.	No change
LIVEDIN (Charlie de Bono)	1141264	Yes "Affordable housing self build From our experience RPs are reluctant to work on small sites (less than 4 affordable dwellings) They also usually rely on a developer to build. On self build serviced plot site this is not possible. So another route is needed:	The draft SPD provides guidance relating to affordable housing to ensure custom and self-build housing developments provide affordable housing in accordance with the Council's evidenced need.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>1. Off-site contributions for CSB (custom self build) ideally CSB delivers our own affordable housing model but until there developed this is a option.</p> <p>2. Exempt tenure ratios for 100% CSB sites. The NPPF defines 4 types of affordable housing - only one is 'Affordable housing for rent'. There is no obligation for every site to have affordable rents - that is at the discretion of the LPA based on identified need and their assessment. There seems to be a strong logic to not impose tenure ratios on CSB sites but take a more programatic and flexible approach.</p> <p>the alternative = Discounted market plots (see Cornwall below)"</p>		
Amy Felton	1142133	<p>Yes</p> <p>With the cost of owning or renting a home so high it seems small self builds especially of a carbon neutral, eco friendly kind, should be easier to access for individuals looking for a simpler, more low cost (in all senses) way of life. Guidance on all aspects of building on currently owned land should be more understandable and easily accessible. Rules should be relaxed where circumstances allow.</p>	<p>There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.</p>	<p>The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.</p>
Charsfield Parish Council (Pamela Hembra)	1142465	No	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Karen King	1142639	No	Comment noted	No change
julia denny	1143363	Don't Know	Comment noted	No change
Bromeswell Parish Council (Verity Brown)	17343233	No	Comment noted	No change
Alan Ambrose	1143679	No	Comment noted	No change
Pigeon Investment Management Ltd (Fillmore, Andrew)	1143979	No No additional guidance is considered necessary.	Comment noted	No change
Hopkins Homes	1144071	As is alluded to within the Consultation Document, it will be important for the LPA to advise and agree at the outset the most expedient way in which to address the requirements of the CIL Regulations as part of any initial proposal for the development of a major site upon which self-build dwellings are proposed to be delivered. It is understood that a 'Phased' development is likely to be required to be specified, in order to enable subsequent self-builders to be able to benefit from CIL Relief.	The draft SPD provides guidance on the self-build CIL exemption.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Clayland Architects (Victoria Corbett)	1144081	Don't Know	Comment noted	No change

Question 4 Are you aware of any good practice in existing SPDs from elsewhere that could be applied in East Suffolk?

Respondent Name	Comment ID	Comment	Council Response	Change Made
Marinus Scheijde	1136750	Don't Know	Comment noted	No change
Andrew Brown	1136754	No	Comment noted	No change
John Bailey	1136756	No	Comment noted	No change
Stephen Holliday	1136779	No	Comment noted	No change
Coyne Environmental (Kenneth Coyne)	1136805	Yes Oxfordshire	The Council has considered planning guidance provided by local planning authorities in Oxfordshire.	No change
John Self	1136815	Yes Graven Hill, Bicester, Oxfordshire, where the council opened up a site for 'free range' development. Every builder could build what they wanted without design interference. This could happen here.	The Council is aware of the large Graven Hill custom and self-build housing development, and has provided a case study on Graven Hill in the draft SPD.	The Graven Hill development has been included in the draft SPD as a case study.
Keith Pierce	1136831	Yes The Welsh governments "One Planet Development" directive. This is a highly successful series of self build projects across Wales which allows people to build their own homes and generate an income on green field [agricultural] sites. Buildings are constructed to a nett Zero Carbon target and incorporate off grid energy production, water collection and waste disposal.	The Council has considered the guidance provided in relation to the identified Welsh government directive.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
David Barefoot	1136925	No	Comment noted	No change
Bromeswell Parish Council (Verity Brown)	1137136	No	Comment noted	No change
Thomas Bury	1137961	No	Comment noted	No change
Neil Brooks	1138112	No	Comment noted	No change
Fiona Ryder	1138775	No	Comment noted	No change
Caroline Kilbride	1138794	Don't Know	Comment noted	No change
Melton Parish Council (Pip Alder)	1139199	No	Comment noted	No change
Mr Farrow	1139763	Don't Know	Comment noted	No change
LIVEDIN (Charlie de Bono)	1141264	Yes "Cornwall p.33 re affordable housing https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/housing-	The Council has considered the affordable custom and self-build housing guidance provided in Cornwall Council's Housing Supplementary Planning Document.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		supplementary-planning-document-spd/"		
Amy Felton	1142133	No	Comment noted	No change
Charsfield Parish Council (Pamela Hembra)	1142465	No	Comment noted	No change
Karen King	1142639	Don't Know	Comment noted	No change
julia denny	1143363	Don't Know	Comment noted	No change
Bromeswell Parish Council (Verity Brown)	1143375	No	Comment noted	No change
Alan Ambrose	1143679	Yes Some of the detail from the community self-build projects could be usefully documented. 'There are now more than 170 CLTs in the UK.'	The Council has considered custom and self-build housing developments brought forward by community land trusts.	The draft SPD includes guidance for households, individuals, and community groups interested in community led housing.
Pigeon Investment Management Ltd (Fillmore, Andrew)	1143979	No	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Hopkins Homes	1144071	No	Comment noted	No change
Clayland Architects (Victoria Corbett)	1144081	Don't Know	Comment noted	No change

Question 5 Are you aware any good custom and self-build housing developments?

Respondent Name	Comment ID	Comment	Council Response	Change Made
Marinus Scheijde	1136750	No	Comment noted	No change
Andrew Brown	1136754	No	Comment noted	No change
John Bailey	1136756	Yes https://www.gravenhill.co.uk/ is a good example of how to operate a development, but personally I wouldn't want to live there because the plots are pitifully small.	The Council is aware of the large Graven Hill custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on Graven Hill.
Stephen Holliday	1136779	Yes Long Four Acres, Mulbarton, Norfolk.	The Council is aware of the Long Four Acres, Norfolk custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on the Long Four Acres development.
Coyne Environmental (Kenneth Coyne)	1136805	Yes Graven Hill	The Council is aware of the large Graven Hill custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on Graven Hill.

Respondent Name	Comment ID	Comment	Council Response	Change Made
John Self	1136815	Yes See 4 above.	The Council is aware of the large Graven Hill custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on Graven Hill.
Keith Pierce	1136831	Yes Google 'One Planer Development Council' Contact Pete Linnell or another member of the Council. Or Just search OPD homes Wales for numerous good examples.	The Council has considered the One Planet Council and examples of One Planet Developments in the preparation of the draft SPD.	No change
David Barefoot	1136925	No	Comment noted	No change
Bromeswell Parish Council (Verity Brown)	1137136	No	Comment noted	No change
Thomas Bury	1137961	No	Comment noted	No change
Neil Brooks	1138112	No	Comment noted	No change
Fiona Ryder	1138775	Don't Know	Comment noted	No change
Caroline Kilbride	1138794	No	Comment noted	No change
Melton Parish Council (Pip Alder)	1139199	No	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Mr Farrow	1139763	No	Comment noted	No change
LIVEDIN (Charlie de Bono)	1141264	<p>Yes</p> <p>Ingoldisthorpe (West Norfolk) https://livedincustombuild.co.uk/ingoldisthorpe/</p> <p>Site: The green field site is in a prominent location in the village of Ingoldisthorpe on the main link road from Kings Lynn to the North Norfolk coast. The scheme provides 12 serviced plots (2 affordable) around a new Village Green with installed services and roads ready for the homeowners to start building their houses (most now occupied)</p> <p>DESIGN CODE Serviced plots provided with a full planning permission that allows for customisation of materials, fenestration and layout.</p> <p>A hallmark of custom build is the choice it offers the homeowner. On sensitive sites (such as this) a balance needs to be struck between offering flexibility and protecting the amenity of neighbours as well as designing the overall appearance of development so that it works in its setting. So, at Ingoldisthorpe, the designs were agreed with the planners so that there is a cohesive appearance to the site, with a 'design code'. By pre-designing the houses and allowing the homeowners to build themselves with some flexibility - we get the best of both worlds - ie the houses will sit harmoniously next to each other and within their village setting, whilst allowing the homeowners to customise the houses to fit their individual needs.</p>	The Council has considered the Ingoldisthorpe development in the preparation of the draft SPD.	No change
Amy Felton	1142133	No	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Charsfield Parish Council (Pamela Hembra)	1142465	No	Comment noted	No change
Karen King	1142639	No	Comment noted	No change
julia denny	1143363	No	Comment noted	No change
Bromeswell Parish Council (Verity Brown)	1143375	No	Comment noted	No change
Alan Ambrose	1143679	No	Comment noted	No change
Pigeon Investment Management Ltd (Fillmore, Andrew)	1143979	As referenced in the introduction to this response the most successful examples are standalone sites which do not form part of a wider allocation. The 'Long Four Acres' scheme in Mulbarton (South Norfolk) is one such example.	The Council is aware of the Long Four Acres, South Norfolk custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on the Long Four Acres development.
Hopkins Homes	1144071	www.gravenhill.co.uk	The Council is aware of the large Graven Hill custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on the Graven Hill development.

Respondent Name	Comment ID	Comment	Council Response	Change Made
Clayland Architects (Victoria Corbett)	1144081	Yes Tadpole Garden Village in Swindon, the Potton area where they manages a part of that site was a good model. Also Graven Hill was a good model would love to see one of those in Suffolk.	The Council has considered the example given of the Tadpole Garden Village, Swindon. The Council is aware of the large Graven Hill custom and self-build housing development, and has considered it further in the preparation of the draft SPD.	The draft SPD includes a case study on the Graven Hill development.

Question 6 Do you have any other comments for us to consider in drafting the SPD?

Respondent Name	Comment ID	Comment	Council Response	Change Made
John Bailey	1136756	Single plot sites for self-build are extremely rare in Suffolk and supply of those needs to improve in order to broaden the options for the creation of diverse and efficient housing within the area. The UK's legacy housing stock is extremely inefficient from an energy perspective and it is apparent that the big housing developers won't improve their standards until forced by legislation. Self-builders tend to be "ahead of the curve" in that respect and will incorporate the latest techniques and technology in order to maximise the sustainability of their houses.	There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.	The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.
Stephen Holliday	1136779	Some guidance for land owners would be useful, particularly encouraging applications for outline planning consent. Building plots are very hard to find and the majority of individual plots that come on the market have detailed planning consent, which is not what a self-builder wants.	The draft SPD includes an appendix setting out the recommended format of planning applications. As is noted, often the best way to deliver serviced plots is by securing outline planning permission. Where design codes are required the expectation will be for design freedom to only be restricted where demonstrably necessary.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Coyne Environmental (Kenneth Coyne)	1136805	We have found a plot in East Suffolk which could potentially fit three self build houses but we would need to find two others to offer a joint bid to buy. Would be helpful to have a web site where people seeking a self build plot could contact others with similar needs to join forces as above.	The Council cannot provide guidance on the sale of land. The Council maintains a register of those interested in acquiring a custom and self-build plot.	No change
John Self	1136815	In The Netherlands, there are numerous sites, similar to Graven Hill, where the local council's site guidelines are applied (a passport?): all houses must adhere to the same build line (for multiple units), maximum height, etc, but choice of cladding, tiles, windows is up to the owner. This can happen here. See: https://www.theguardian.com/money/2011/nov/25/self-build-go-dutch	The Council is aware of the innovative and high quality custom and self-build housing provided in the Netherlands and the use of plot passports which is common in the Netherlands and the UK. The draft SPD provides guidance on the implementation of design codes and plot passports.	No change
Keith Pierce	1136831	The drive and momentum currently being generated around green buildings and construction methods offers a perfect opportunity for Suffolk to lead other Councils across England and the UK, perhaps following the Welsh governments example. One Planet Development principles also align perfectly with the Climate Emergency Policy adopted by Suffolk as it can help to address the affordable housing issues as well as sustainability, local food production, health and well being, local employment problems and much more. We are presently working on a range of pre approved SIPS building designs which home builders can select from, that are produced locally using local materials and workforce, that conform to building regulations and	There is a common desire to achieve high environmental performance amongst custom and self-builders. The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.	The draft SPD highlights the importance of orienting homes/plots to maximise passive solar gain. The draft SPD also highlights the Council's adopted Sustainable Construction SPD which provides further information about sustainable construction measures.

Respondent Name	Comment ID	Comment	Council Response	Change Made
		greatly simplify the approval process for planners and councillors during consultation.		
Bromeswell Parish Council (Verity Brown)	1137136	No, the document sets the relevant information out clearly and i have nothing to add.	Comment noted	No change
Fiona Ryder	1138775	See all the comments above.	Comment noted	No change
Melton Parish Council (Pip Alder)	1139199	Do self build developments include enough affordable units?	Custom and self-build developments would be subject to the Council's affordable housing policies in the same way as any other residential development.	No change
Mr Farrow	1139763	Just think about those with smaller budgets and local connections to the land. Perhaps increase the CIL for those that don't have a local connection. Look after the locals not encourage the wealthy to those wanting a second+ home	<p>The draft SPD provides guidance on affordable housing that meets the NPPF (2021 Glossary) definition, as well as making custom and self-build housing more affordable through the provision of a range of plot sizes.</p> <p>It will not be possible to reduce the Community Infrastructure Levy for those with a local connection. It is also worth noting that custom and self-build housing cannot be used as a second home, it must be the occupants' primary residence.</p>	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
Mutford Parish Council (Mrs Colbridge)	1142207	Mutford Parish Council suggests that the final supplementary planning document must provide a clear and precise definition of 'self-build' housing, to avoid any potential ambiguity or abuse of the planning rules	The draft SPD sets out that custom and self-build housing must satisfy the legal definition set out in the Self-build and Custom Housebuilding Act 2015.	No change
Nigel Herrod	1142481	<p>The Council is failing in it's obligation to permission Custom and Self Build Sites at the rate laid out in the legislation.</p> <p>The proposed SPD attacks the fundamental desire of house owners to create their own special dwellings by further increasing the rules around the design and build which limits individualism.</p> <p>The proposed SPD will not affect the lack of sites being permissioned.</p> <p>Instead of focusing on this document the council should re assess the fundamentals in the Local Plans to allow controlled but increased numbers of single and small sites to be permissioned.</p> <p>Currently the balance of housing town to countryside is disproportionate stifling the rural communities and cramming built up areas making them over developed and unpleasant.</p> <p>The NPPF states that new housing in the countryside should sited where houses already exist, i.e. serviced locations. The limitations imposed by SCLP5.4 (Housing in Clusters in the Countryside) and WLP8.7 (Small Scale</p>	<p>Those interested in custom and self-build housing will usually desire to design their own home with as much design freedom as possible. The draft SPD makes clear that design freedom should only be restricted where demonstrably necessary.</p> <p>The guidance should aid the delivery of custom and self-build housing and therefore the availability of custom and self-build housing plots.</p> <p>The Council will review the Local Plans and their housing policies, including policies relating to custom and self-build housing and specialist older persons housing with a view to increasing the number of custom and self-build homes and specialist older persons housing in East Suffolk.</p>	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>Residential Development in the Countryside) should be relaxed and be covered by an appropriate assessment.</p> <p>Furthermore the as laid out in the 2009 HAPPI Report, many older people in rural communities are living in larger inappropriate housing but have no desirable housing options to downsize into. Many wish to continue living in the countryside, where they have lived all their lives. Priority should be given to OAP housing through the ""exception site"" policy, this working in line with the ""Custom and Self Build"" policy would create flow in the rural housing market. Allowing smaller appropriate individual properties would be far more acceptable than large building sites stuck onto the edge of rural communities eg. Ringsfield WLP7.14.</p>		
Ipswich Borough Council (sally minns)	1142486	The only comment from Ipswich Borough Council has to make is that as the SPD develops, it needs to reflect the emerging agenda of the Levelling Up Bill which is providing a better link between the need to maintain a Register and new available self-build custom build sites which is being made much stronger rather than 'have regard to'.	The Council will continue to keep abreast of the Levelling Up and Regeneration Bill as it progresses to royal assent.	No change
Henstead with Hulver Street Parish Council (Colbridge)	1142930	Henstead with Hulver Street Parish Council have considered this consultation and have no issues with the proposals.	Comment noted	No change
Historic England (Marsh, Andrew)	1143659	Thank you for consulting us on the Council's Custom and Self-Build Housing Supplementary Planning Document – Initial Consultation Document. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on these proposals.</p> <p>I can confirm that while we do not have any specific comments to make at this stage, we will be interested in receiving subsequent consultations on this and related projects.</p>		
Norfolk County Council (Joe Wyatt)	1143660	Thank you for consulting Norfolk County Council on the above SPD initial consultation. We generally support the plans as set out in the SPD and have no objections at this stage.	Comment noted	No change
Saxtead Parish Council (Lydia Kirk)	1143661	<p>Saxtead Parish Council carefully considered the Supplementary Planning Document in a sincere attempt to discover its purpose. It was noted that an SPD cannot create new or amend existing planning policies nor can it prescribe that particular areas of land be developed for particular uses.</p> <p>We acknowledged that considerable time and effort had been put into its publication but bearing in mind the constricted parameters for application the SPD appears to have little value as its practical use seems arbitrary.</p> <p>The Parish Council is open to being persuaded otherwise.</p>	Comment noted	No change
Alan Ambrose	1143679	It would be more than useful to have a dedicated East Suffolk LPA contact point for self-builders for a more 'conversational' contact point as opposed to the 'web page submit document' style of contact point. It could be that some great local projects might be germinated that	The Council would like to be able to provide self-builders with more officer time, however the constraints on officer time simply do not allow this at present. The Council will seek to ensure	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		way. Perhaps associated with the 'Suffolk Design Review Panel'?	the guidance provided in the Supplementary Planning Document meets the needs of those interested in custom and self-build housing and reduces the need for officer time.	
Pigeon Investment Management Ltd (Fillmore, Andrew)	1143979	<p>Thank you for consulting Pigeon on the East Suffolk Custom and Self-Build SPD. We very much welcome the opportunity to participate in the current consultation. The following comments are submitted in the interests of facilitating the delivery of Custom and Self-Build Housing in the district, and ongoing collaborative working between Pigeon and East Suffolk Council.</p> <p>Whilst Pigeon recognises the purpose of the SPD is to provide guidance on the consideration of Custom and Self-Build proposals in respect of adopted policies in the Development Plan it is worth considering whether the approach adopted (5% of larger sites to be given over to Custom/Self-Build) delivers the number and type of accommodation which reflects the demand as set out on the Custom/Self-Build Register. Pigeon has previously advocated that the Council adopt an alternative strategy with a criteria based policy which supports small scale schemes coming forward on the edge of sustainable settlements. We encourage the Council to monitor the effectiveness of the current policy in the delivery of Custom/Self-Build housing and consider how this may need to be amended going forward to meet the identified demand.</p>	The Council will consider different and additional policy approaches to the delivery of custom and self-build housing as part of the review of the Local Plans. As is noted by the respondent, this cannot be addressed in the Supplementary Planning Document, which must not conflict with the development plan.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<ul style="list-style-type: none"> • Design Codes and Plots Passports – We recognise the benefits of Design Codes and Plot Passports in securing high-quality Custom/Self-Build schemes and consider these should be secured by way of condition as part of an outline planning permission. Having an outline planning permission provides the necessary certainty, and a clear planning framework to enable high quality design parameters to be established. It is recommended the SPD clearly sets out that the requirements for Design Codes and Plot Passports are only required to be brought forward alongside the first of any Reserved Matters applications, and can be secured by condition. <p>An example of where this has been achieved in East Suffolk relates to outline planning application DC/20/5279/OUT for 139 new homes at Land adjacent to Reeve Lodge, High Road, Trimley St Martin.</p> <ul style="list-style-type: none"> • Phasing – The delivery of the Custom/Self-Build plots as part of larger site raises issues in respect of site management, including traffic management, and health and safety considerations. To best address these we advocate an approach whereby the Custom/Self-Build Housing forms a distinct phase, and that the timing of the delivery of the phase is agreed with the Council on a site specific basis reflecting matters such as site access and provision of infrastructure to serve the Custom/Self-Build Homes. • Model Conditions - Custom/Self-Build schemes often take longer to come forward than typical schemes, which can raise issues in respect of the standard 3 and 2 year 	<p>The draft SPD provides guidance on the expectations in relation to design codes and plot passports. The draft SPD also includes an appendix which sets out the recommended format of planning applications for different forms of custom and self-build housing. In general, it will usually be acceptable to secure the design code and plot passports after outline consent. However, it will of course depend on the particular circumstances of each case.</p> <p>The draft SPD provides guidance on phasing, and includes a model phasing plan.</p> <p>The draft SPD includes an appendix with model conditions that can be used and tailored to each permission.</p>	

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>time limit conditions. We advocate the SPD supports the use of bespoke conditions on a site-by-site basis which allow a longer time period for the submission of Reserved Matters and implementation of Custom/Self-Build Housing applications.</p> <ul style="list-style-type: none"> • S106/CIL – Related to the comments made in respect of phasing it is important that the Council advocate an approach which includes the Custom/Self-Build Housing within its own specific phase of the site to enable a claim from CIL exemption to be made. <p>We trust that the above comments will assist the Council with its ongoing preparation of the Custom and Self-Build SPD, and look forward to working with officers on producing this guidance. In this regard we would welcome the opportunity to meet to run through the matters raised in this submission.</p>	<p>Recognised within the appendix is the need to allow custom and self-build housing longer in relation to time limited conditions.</p> <p>The draft SPD includes guidance relating to CIL, phasing, and model s106 clauses.</p>	
Martlesham Parish Council (Susan Robertson)	1143982	<p>Martlesham Council (MC) welcomes the further guidance in this supplementary planning document and was pleased to be able to send representatives to the consultation workshop in February. We found this very helpful.</p> <p>We suggest that the planning guidance provides reference to:</p> <ul style="list-style-type: none"> * The application process which needs to be followed in order to gain a self -build exemption from the community infrastructure levy; * Where to find more information on the role of the self -build and custom build register, and how to join; 	<p>The draft SPD includes guidance relating to the self-build Community Infrastructure Levy (CIL) exemption, custom and self-build register, and design considerations. The draft SPD does not prescribe particular design parameters for designated areas (e.g. AONB), as such design parameters will need to be determined based on the particular site context.</p>	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		* The specific design codes concerning individual Custom and Self-Builds within Special Landscape Areas and AONBs.		
Hopkins Homes	1144071	Whilst it is understood that the purpose of self-build development is to allow individuals to design the form, scale and appearance of the respective dwelling concerned, given that the only way seemingly being proposed for such delivery in East Suffolk is via a requirement to accommodate these as a % of a larger development, it will be important for adequate regard to be had to the corresponding form, scale and appearance of the permitted dwellings on the larger development in determining the appropriateness of the respective self-build dwellings being proposed.	The draft SPD makes clear that design codes will be expected to only restrict design freedom where demonstrably necessary. It is worth noting the economic evidence prepared by Chamberlain Walker Ltd for the Bacon Review (page 88), which found that the greater the variety in custom and self-build housing design compared to new build design, the more likely it is that custom and self-build sales won't be substituting for new build sales.	No change
Clayland Architects (Victoria Corbett)	1144081	I have worked as an architect with self-builders all my career; and you can see the personality, thought and effort put into one-off houses is significantly higher than when you give land to developers to 'fill' for max profit, developer models can often turn everywhere into the same style of house. I would like it if there was a target to hit for self building that was separate from the 5 year housing land supply. This would promote self building on smaller plots. you could also promote or give more tax breaks to self builders. You could make some kind of incentive to custom building?	The Self-build and Custom Housebuilding Act 2015 requires local authorities to hold a register of all those seeking a custom or self-build plot to build their own home on. This demand for custom and self-build housing must be met by the local authority by granting enough planning permissions. This requirement is separate to the five year housing land supply requirement. East Suffolk Council cannot alter taxes to incentivise custom and self-build	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>This is also seen in custom build developments, you get much happier house owners and a higher design quality, often as architects and designers are used rather than the cookie cutter model.</p> <p>As architects and developers in the area, we would love to be involved further in the SPD. Maybe if there was a register so self builders could find architects and developers that do custom build easily?</p>	<p>housing; this is a central government function.</p> <p>The idea of a custom and self-build register of architects, builders, and other consultants is an interesting idea. However, this cannot be addressed in the Supplementary Planning Document.</p>	
National Highways (Mark Norman)	1144083	<p>National Highways welcomes the opportunity to comment on the Custom and Self-Build Housing Supplementary Planning Document (SPD) to be prepared by the East Suffolk Council, which is proposed to be prepared in line with the Suffolk Coastal Local Plan (adopted September 2020) and the Waveney Local Plan (adopted March 2019).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this proposed SPD, our principal interest will include safeguarding the operation of the SRN routes within Suffolk, specifically within the east Suffolk area, these include A12 and A14, both of which run through</p>	Active travel and parking arrangements will be required of all forms of residential development in accordance with Local Plan policies.	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>the whole county and provide access to the largest settlements in the area.</p> <p>We understand that the SPD will be required to be in conformity with relevant national and county-wide planning and strategic policies which includes the Suffolk Coastal Local Plan (adopted September 2020), Waveney Local Plan (adopted March 2019), Town and Country Planning Regulations 2012 and the National Planning Policy Framework, to name a few.</p> <p>The proposed document is expected to set out the design guide to provide designers with a clear sense of priorities for the built environment to enable smooth progress through the planning process for high-quality and sustainable designs in Suffolk. The document will provide guidance in regard to Policy SCLP5.9 (Self Build and Custom Build Housing) and Policy WLP8.3 (Self Build and Custom Build).</p> <p>The key themes of interest for National Highways will include the importance of sustainability in promoting new schemes and housing design as well as maximising the effectiveness of sustainable strategies by applying them early in the development process. Similarly, focuses on the importance of reducing the amount of car parking spaces and integrating sustainable modes of travel better within new developments by promoting cycle parking and how developments should provide high-quality cycle parking which is at least in accordance with best practice guidance (key document including the London Cycling Design Standards 2014).</p>		

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>National Highways supports the promotion of sustainable modes of travel within new developments as it reduces the impact of new developments within the vicinity of the SRN to have a significant impact on the local SRN network. Similarly, we support the promotion of the user hierarchy and the importance of prioritising sustainable modes of travel at the very top and reducing the reliance on motor traffic with the key to permeability being achieved through new developments in a way to minimise the need to travel and encouraging sustainable modes of travel that are easily accessible.</p> <p>Furthermore, National Highways supports the promotion of mixed-use developments and developments close to existing facilities as it reduces the impact of new developments within the vicinity of the SRN to have a significant impact on the local SRN network by reducing the potential trip generation.</p> <p>We consider that this document will not have any significant impacts on the operation of the SRN in the area due to the type of document this is, it is considered that the designs which will be set out within the document will be unlikely to have an impact on the operation or capacity of the SRN as the main purpose of this document is to promote higher quality of homes and improve the efficiency of the building environment.</p> <p>However, we look forward to reviewing further progress on the SPD and hope the above comments provide useful information in the progression of the Custom and Self-Build Housing SPD for East Suffolk Council</p>		

Respondent Name	Comment ID	Comment	Council Response	Change Made
Suffolk County Council (Georgia Teague)	1145029	<p>Thank you for consulting Suffolk County Council (SCC) on the Custom and Self-Build Housing SPD.</p> <p>Health and Wellbeing</p> <p>SCC would suggest that this SPD encourages, where possible, the creation of open and/or green spaces as part of small-scale self-build development sites. Access to pleasant outdoor and open spaces can provide positive impacts to both mental and physical health and wellbeing.</p> <p>Self-build developments should consider access to the wider community, including to services and facilities such as shops, schools, and employment spaces. This SPD should encourage the means of active and sustainable travel, such as walking and cycling, to reach these services rather than the reliance on private vehicle usage. With fewer cars on the road networks, this can help to improve air quality, which can help to reduce health impacts as a result of pollution. Active travel encourages exercise, leading to improvements of physical health by reducing obesity.</p> <p>Self-build housing proposals should include adequate and secure cycle storage facilities.</p> <p>Self-build housing and small-scale development should have consideration for building dwellings to be adaptable and accessible, in order to meet the needs of an aging population.</p>	<p>Open space, active travel, accessible and adaptable homes, SuDS, and parking arrangements will be required of all forms of residential development in accordance with Local Plan policies.</p>	<p>No change</p>

Respondent Name	Comment ID	Comment	Council Response	Change Made
		<p>Whilst the WLP and SCLP each have percentages of M4(2) requirements in set out policy, the SPD could further encourage self-build and custom dwellings to be built to these standards.</p> <p>Strategic Infrastructure</p> <p>Self-build developments should consider access to facilities and services that can be achieved sustainably, such as through public transportation, walking, and cycling. The SPD should be made clear that any self-build development will need to be provided with necessary strategic infrastructure including SuDS and access to the existing road network and/or provision of on-site highways network with active travel routes, in accordance with the Suffolk Design: Streets Guide (or any successor documents). Consideration will need to be given, on a site-by-site basis, to who has responsibility for the provision and delivery of strategic infrastructure, its adoption and/or on-going maintenance, to ensure this is delivered to a high quality. Ideally, strategic infrastructure should be provided before the first parcel is even commenced.</p> <p>It is recommended that the SPD requires any self-build or custom housing to include residential parking standards as set out in the Suffolk Guidance for Parking (2019) or any successor documents. Cycle parking and storage should also adhere to this document.</p> <p>General</p>		

Respondent Name	Comment ID	Comment	Council Response	Change Made
		SCC supports the ambitions for inclusion of custom and self-build housing in neighbourhood plans, through community-led groups.		
Natural England	1146812	<p>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.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>Whilst we welcome this opportunity to give our views, the topic of 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>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation</p>	Comment noted	No change

Respondent Name	Comment ID	Comment	Council Response	Change Made
		Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.		

Appendix 2: Initial Consultation Bodies

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

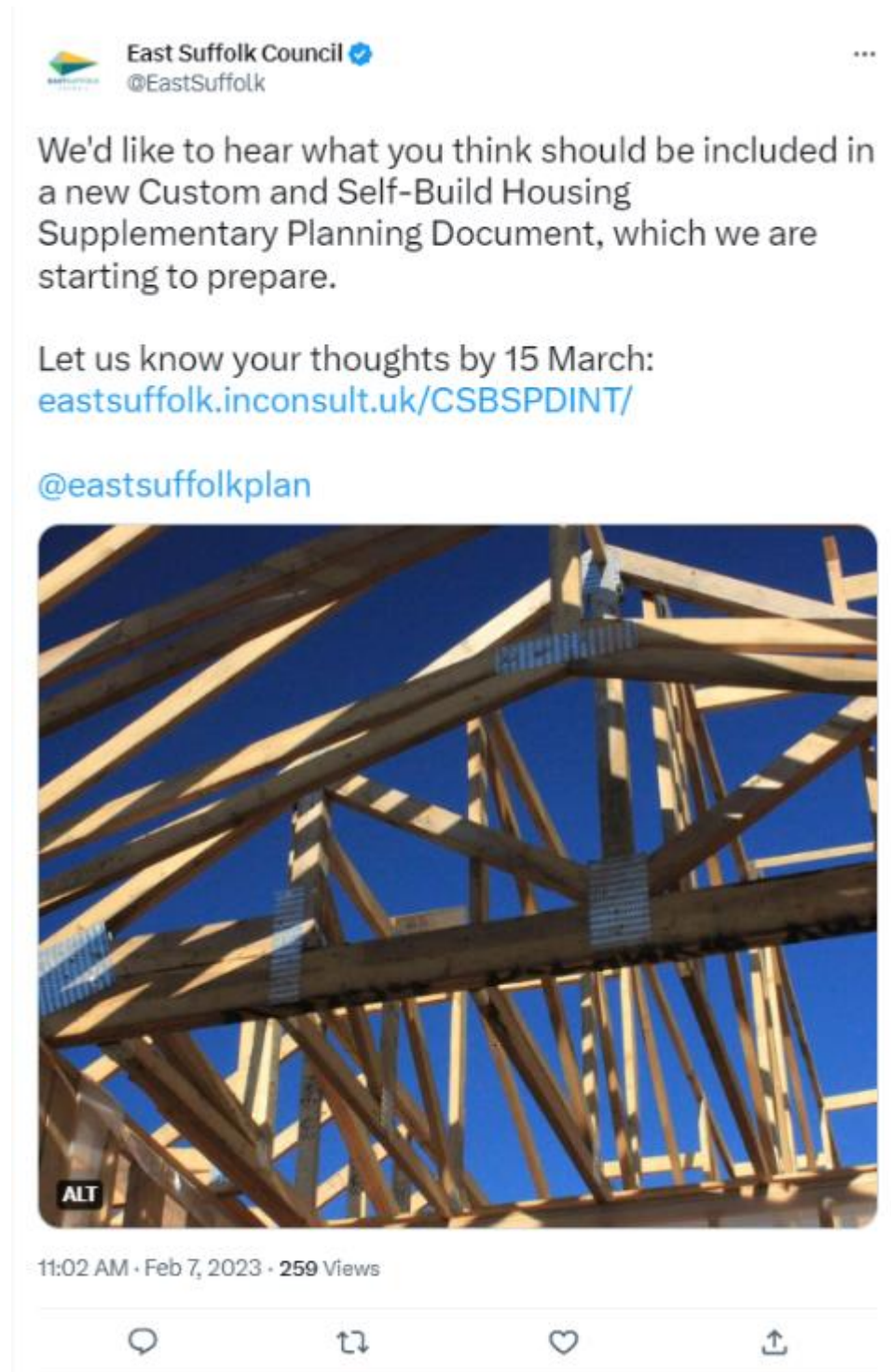
- Elected members
- Developers / landowners / agents
- Suffolk County Council
- Broads Authority
- Historic England
- Natural England
- Environment Agency
- Town and Parish Councils
- Individuals and groups on the custom and self-build register

Specific consultation bodies


Anglian Water
Babergh and Mid Suffolk District Councils
Broadland Housing Association
Community Action Suffolk
DEFRA
Department for Culture, Media and Sport
Department for Transport
EDF Energy Generation Ltd
English Heritage
Essex and Suffolk Water
Great Yarmouth Borough Council
Greater Norwich Local Plan Team
Home Builders Federation
Homes England
Ipswich Borough Council
Marine Management Organisation
National Grid
National Highways
National Trust
Network Rail
New Anglia Local Enterprise Partnership
NHS Property Services
Norfolk County Council
RSPB
South Norfolk District Council
Sport England
Suffolk Fire & Rescue Service
Suffolk Police
Suffolk Wildlife Trust
Sustrans
UK Power Networks
West Suffolk Council

Appendix 3: Initial Consultation Promotion Material

Twitter – 7th February 2023




The image is a screenshot of a Twitter post from East Suffolk Council. The post includes the council's profile picture and name, a text message inviting public input on a new housing document, a deadline of 15 March, a URL for the consultation, a mention of @eastsuffolkplan, a photograph of a wooden roof frame, and engagement icons at the bottom.

East Suffolk Council 
@EastSuffolk





We'd like to hear what you think should be included in a new Custom and Self-Build Housing Supplementary Planning Document, which we are starting to prepare.

Let us know your thoughts by 15 March:
eastsuffolk.inconsult.uk/CSBSPDINT/

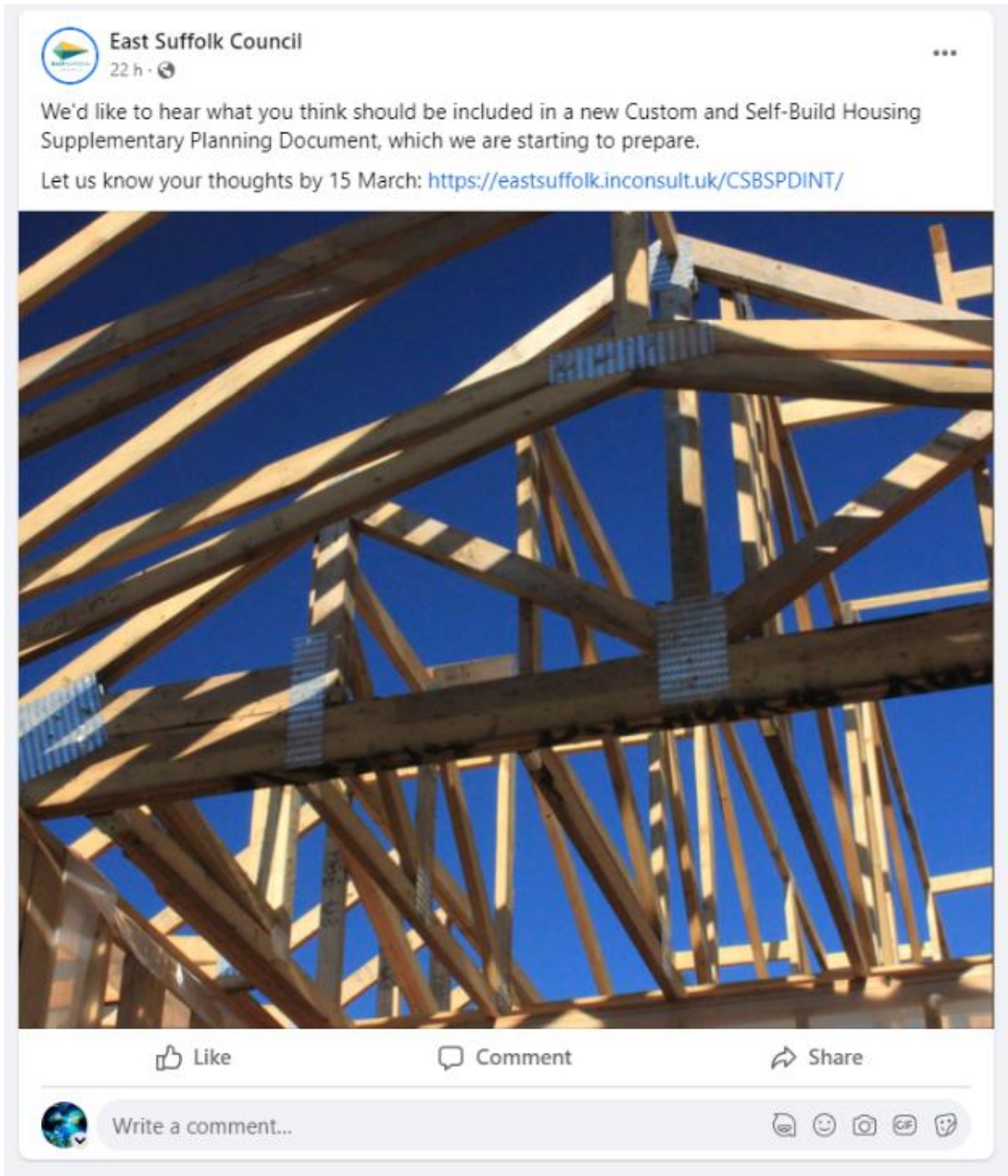
@eastsuffolkplan



11:02 AM · Feb 7, 2023 · 259 Views


Facebook – 7th February 2023




East Suffolk Council
22 h · 🌐

We'd like to hear what you think should be included in a new Custom and Self-Build Housing Supplementary Planning Document, which we are starting to prepare.

Let us know your thoughts by 15 March: <https://eastsuffolk.inconsult.uk/CSBSPDINT/>



👍 Like 💬 Comment ➦ Share

 Write a comment... 🗨️ 😊 📷 📧 🎭

Appendix 4: Draft 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
- Town and Parish Councils
- Individuals and groups on the custom and self-build register

Specific consultation bodies

Anglian Water
Babergh and Mid Suffolk District Councils
Broadland Housing Association
Community Action Suffolk
DEFRA
Department for Culture, Media and Sport
Department for Transport
EDF Energy Generation Ltd
English Heritage
Essex and Suffolk Water
Great Yarmouth Borough Council
Greater Norwich Local Plan Team
Home Builders Federation
Homes England
Ipswich Borough Council
Marine Management Organisation
National Grid
National Highways
National Trust
Network Rail
New Anglia Local Enterprise Partnership
NHS Property Services
Norfolk County Council
RSPB
South Norfolk District Council
Sport England
Suffolk Fire & Rescue Service
Suffolk Police
Suffolk Wildlife Trust
Sustrans
UK Power Networks
West Suffolk Council

Appendix 5: Draft Consultation Promotional Material

Twitter 6th September 2023

↻ East Suffolk Council Planning reposted

 **East Suffolk Council** @EastSuffolk

East Suffolk residents are invited to have their say on a new planning document covering custom and self-build housing: bit.ly/45AVbTB

[@eastsuffolkplan](https://twitter.com/eastsuffolkplan)



9:00 AM · Sep 6, 2023 · 653 Views

🗨️ ↻ 4 ❤️ 1 📌 ↗

Twitter – 11th October 2023

East Suffolk Council Planning reposted



East Suffolk Council
@EastSuffolk



There's still time to comment on a draft planning document which provides guidance on the development of custom and self-build housing: bit.ly/45AVbTB

Consultation closes on 18 October.




ALT

East Suffolk Council Planning

10:18 AM · Oct 11, 2023 · 569 Views




Facebook – 6th September 2023


 **East Suffolk Council**
6 September 2023 · 🌐



Have your say on a new planning document covering custom and self-build housing.

A consultation on the draft Custom and Self-build Housing Supplementary Planning Document, which provides guidance on the development of custom and self-build housing, is now open.

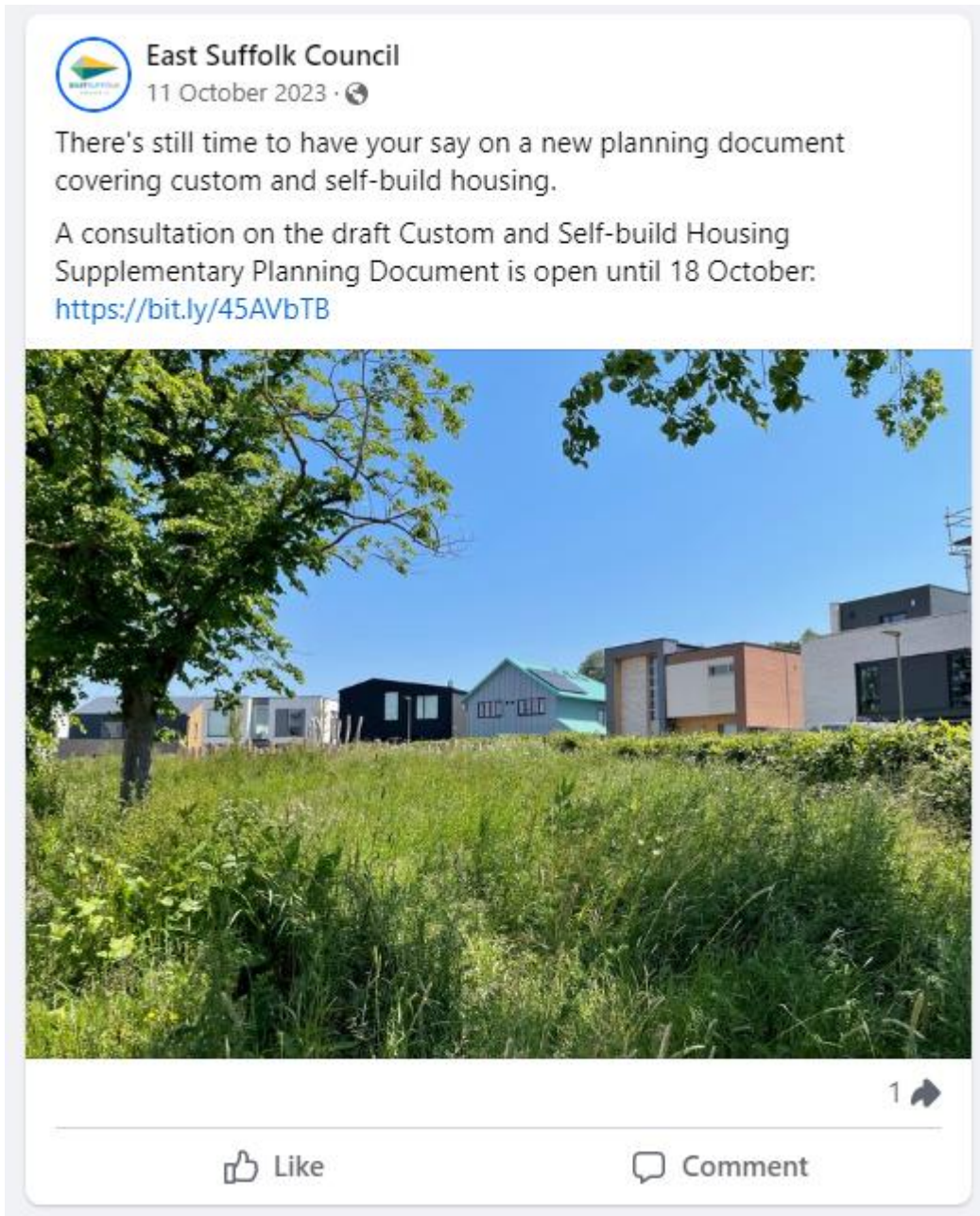
Find out more and comment at <https://bit.ly/45AVbTB>



 1

 Like  Comment

Facebook – 11th October 2023



The image shows a Facebook post from East Suffolk Council. At the top left is the council's logo, a circular emblem with a stylized landscape. To its right, the text reads "East Suffolk Council" in bold, followed by "11 October 2023" and a globe icon. The main text of the post says: "There's still time to have your say on a new planning document covering custom and self-build housing. A consultation on the draft Custom and Self-build Housing Supplementary Planning Document is open until 18 October: <https://bit.ly/45AVbTB>". Below the text is a photograph of a row of modern, colorful houses (white, black, and grey) with a green roof, situated behind a field of tall green grass. A large tree is on the left side of the photo. At the bottom of the post, there are icons for "Like" (thumbs up), "Comment" (speech bubble), and a share icon (arrow) with the number "1" next to it.

Press release – 5th September 2023

Have your say on a new planning document

Posted by on 5 September 2023 | Comments

East Suffolk residents are invited to have their say on a new planning document covering custom and self-build housing.

A consultation on the draft Custom and Self-build Housing Supplementary Planning Document (SPD), which provides guidance on the development of custom and self-build housing, begins on Wednesday 6 September.

The Suffolk Coastal Local Plan and the Waveney Local Plan each contain a policy which supports custom and self-build housing. The Custom and Self-build Housing SPD provides further guidance on the application of these policies:

- Policy SCLP5.9 Self Build and Custom Build Housing (Suffolk Coastal Local Plan, 2020)
- Policy WLP8.3 Self Build and Custom Build (Waveney Local Plan, 2019)

The draft SPD covers a range of topics including the types of housing that qualify as custom and self-build housing, an overview of the self-build exemption from Community Infrastructure Levy, consideration of design and the application of design codes, and guidance to help ensure custom and self-build housing is appropriately marketed.

Cllr Kay Yule, East Suffolk's cabinet member for Planning and Coastal Management said:

"Supplementary Planning Documents provide detailed guidance to developers and in this case, to people building their own properties. We welcome any feedback and all comments received will be taken into account when finalising the document."

Comments on the Draft Custom and Self-build Housing Supplementary Planning Document must be submitted by 5pm on Wednesday 18 October 2023.

From 6 September, [you can view the consultation and comment](#).

Comments can also be emailed to planningpolicy@eastsuffolk.gov.uk or sent to East Suffolk Council, Planning Policy and Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ.

Paper copies of the draft SPD and consultation statement have been made available for inspection at [all libraries in the district](#) and at the Council's [Marina Customer Services Centre](#) in Lowestoft.

All comments received will be considered when finalising the Custom and Self-build Housing SPD, which will be adopted in the winter of 2023/24. Once adopted, the SPD will be a material consideration in determining planning applications.



Poster – 6th September 2023



Consultation period
6th September to 18th October 2023

Public Consultation on a draft Supplementary Planning Document

Custom and Self-Build Housing

What are we doing?

East Suffolk Council is preparing a document to support planning policy which will provide guidance on the consideration of custom and self-build housing development proposals.

The draft document explains what custom and self-build housing is and importantly what it isn't, as well as demonstrates the range of delivery models that meet the legal definition of custom and self-build housing.

How can you get involved?



HIGHLIGHT ISSUES

Matters to highlight could relate to the design and delivery of self-build plots.



SUGGEST SOLUTIONS

Are there other ways the Council could support custom & self-build?

Find out more and give your views:

[www.eastsuffolk.gov.uk/
planningpolicy](http://www.eastsuffolk.gov.uk/planningpolicy)

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

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

Appendix 6: Draft Consultation Responses

The table below lists the comment summaries from the consultation responses, the Council’s response and how they informed the preparation of the document. The full consultation responses can be viewed here: <https://eastsoffolk.inconsult.uk/CSB0823DRAFT/listRespondents>

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
1. Introduction	Anonymous	1	The requirement for 5% of homes on developments of 100 or more homes to be custom and self-build homes is inadequate. Custom and self-build homes tend to deliver higher environmental standards than standard new build homes, and large scale developments do not pay adequate attention to the size of gardens and outdoor spaces, wildlife protection, quality of design and construction, sustainability. This is due to inherent nature of the profit-led development model.	The requirement for at least 5% of homes on developments of 100 or more homes to be custom and self-build homes is established in the Council’s two adopted local plans. Local Plan policies cannot be amended by a supplementary planning document.	No change
1. Introduction	Anonymous	3	Some of the custom and self-build houses at Corton, near the Rugby Club, lead to disasters due to the use of amateurs. With regard to the photograph in your advert, if that is the sort of design that we end up with, it will end in disaster. Can we be assured that the design will be in keeping with the area and is very carefully monitored, as to who the custom and self-builder employs to carry out the work.	Custom and self-build housing would need to meet the same design standards as any other form of housing, irrespective of who it is designed and/or constructed by. Self-build housing can be designed and built by the initial occupants, however a more common approach is for initial occupants to commission the design and construction of their homes.	No change

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
1. Introduction	Anonymous	4	You can't handle the back log of planning applications, so how do you think you can deal with any new applications?	Comment noted	No change
1. Introduction	Gibberd, Brenda	6	I fail to see why this consultation has been sent to me as I have no interest in custom and self-build housing. However, I have read through it and find it long winded and repetitive. Anyone contemplating custom and self-build housing is likely to be very confused by the time they have read the entire document.	Individuals and organisations signed up to the Council's planning policy mailing list and/or the custom and self-build register received notification of the consultation on the draft SPD. Whilst we have sought to keep the SPD as short as possible, there is a significant amount of detail that must be addressed.	No change
1. Introduction	Natural England	7	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites,	Comment noted	No change

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
			<p>they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk</p>		
1. Introduction	Leigh Cunningham	8	<p>Any custom and self-build housing policy should take into account the existing infrastructure, i.e. impact on the existing roads, the services available in that area for instance doctor's surgery, dentists, schools. Any new builds must be in keeping with the surrounding properties, for example not built to look like a futuristic block of cheese when the neighbouring houses look nothing like this.</p>	<p>New development, including custom and self-build homes, will be built in locations which accord with the spatial strategy contained in the district's local plans. The spatial strategies take into account infrastructure needs. Furthermore, impacts on existing infrastructure will be considered when determining planning applications for development, including those for custom and self-build housing.</p> <p>In respect of design and appearance, the nature of custom and self-build housing requires the initial</p>	No change

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
				occupant to have a primary input into the final design and layout of their home. As such, a degree of design freedom must be afforded to initial occupants. Design freedom will be constrained where demonstrably necessary.	
1. Introduction	Melton Parish Council (Pip Alder)	9	Overall, the Parish Council supports this guidance document however it remains concerned that National Policy still gives a zero rating for CIL for self-build housing.	Support welcomed. The exemption from the Community Infrastructure Levy is set out in legislation, which the Council has no powers to alter.	No change
1. Introduction	Felixstowe Town Council (Ash Tadjrishi)	13	Thank you for the opportunity to be consulted on this SPD. The Town Council's Planning & Environment Committee considered the document at its meeting yesterday and believe it to be a very thorough, comprehensive, and helpful document.	Support welcomed	No change
1. Introduction	Badger Building (E.Anglia)Ltd (Edward Gilder)	14	Those seeking to register should be "viability tested" to ensure that they have the means to see a project through, otherwise a false idea of demand is created by households with insufficient resources seeking registration. Registration should be allowable with only one council to avoid the double counting (or more), of demand. The allocation of sites should relate to the outcome of the above not some figure representing aspiration and	The Self-build and Custom Housebuilding Act 2015 does not restrict people from joining more than one register. The supplementary planning document will not consider the allocation of sites although this may form part of a future local plan review, taking appropriate	No change

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			expressions of demand lodged with more than one council.	account of indicators of demand.	
1. Introduction	National Highways (Sir/Madam)	31	<p>National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In relation to this proposed Custom and Self-Build Housing Supplementary Planning Document (SPD), our principal interest will include safeguarding the operation of the SRN routes within Suffolk, specifically within the East Suffolk area, these include A12 and A14, both of which run through the whole county and provide access to the largest settlements in the area.</p> <p>After completing the review of the supporting document related to this above-mentioned SPD. There would not have any predicted adverse impact on the Strategic Road Network (SRN).</p> <p>National Highways do not have any comment on this above-mentioned SPD.</p> <p>Standing advice to the local planning authority</p> <p>The Climate Change Committee’s 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise</p>	Comment noted	No change

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			<p>that appropriate opportunities to promote walking, cycling and public transport should be taken up.</p> <p>Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.</p> <p>These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.</p>		
1. Introduction	Parker Planning Services (Jason Parker)	32	<p>Unfortunately, the SPD relates to a policy which in essence states that the LPA will not approve self-build development unless it would have otherwise been approved for standard housing. As such the Council does not actually have a self-build policy which is capable of requiring any dwelling being restricted to self-build purposes, for the following reasons:</p> <ul style="list-style-type: none"> - Circular 11/95 sets out 6 tests for the imposition of planning conditions (Or proposals which are otherwise restricted by a unilateral agreement). Such tests include whether it is necessary or reasonable. If a proposal came forward for a dwelling which the applicant suggested would be for self-build, the council could not reasonably restrict it purely to self-build purposes because they will only approve self-build development if the development would have been otherwise approved as a standard dwelling anyway. As it 	The Council’s Local Plan policies regarding custom and self-build housing require 5% of homes on developments of 100 or more homes to be custom and self-build housing on serviced plots. The policy approach is similar to that of our affordable housing policy, which provides for a percentage of homes to be delivered as affordable housing. This approach was found to be sound and is commonly used in local plans nation-wide.	No change

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			<p>would 'restrict' the development the council cannot lawfully restrict the dwelling to self-build.</p> <ul style="list-style-type: none"> - Scenario 1. I apply for planning permission for one dwelling. The dwelling is for myself so will be self-build. However, as the council policy is that the application will only be approved if you would have approved it for a standard dwelling the council cannot impose planning conditions or a legal agreement to require the plot for self-build. As a planning condition would be a limiting condition there is no rationale for me to ask for it as a self-build dwelling. I may as well just say its a dwelling and then this leaves my options open to do a self-build or sell the dwelling to a house builder. - Scenario 2, Application for 5 plots. Schemes of this size are attractive to the self-build Scenario or to sell the entire site to a small builder. For the same reasons as Scenario 1 the council cannot require me to provide them for self-build. Also, there is no rationale or benefit for someone to state they will be self-build. As such it doesn't really matter whether the plots will eventually meet the definition for self-build or comply with the new SPD as there is no benefit or logical reason for anyone to comply with the Council's policy in relation to Self-build Plots. <p>For the reasons outlined above, the Council either needs to create a new self-build policy or guidance in relation to the fact that they are effectively absent or silent on the</p>	<p>In addition to the above, the Council's two Local Plans include policies which give support to the development of custom and self-build housing. The two Local Plans are therefore not silent on the matter of custom and self-build housing.</p>	

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
			<p>matter of the provision of self-build plots, as they have no real policies in relation to the specific provision of self-build, for the reasons expressed above.</p> <p>Without this the SPD is only useful for the situation whereby the Council is considered to be 'absent or silent' on the provision of self-build or are failing to meet their self-build 'duties'. In that situation this would mean that paragraph 11 of the NPPF would come into play and an application coming forward for self-build development would be considered in line with the 'titled balance'. In that scenario it would be 'reasonable' for a dwelling to be restricted to self-build. It would then be important for the dwelling to meet the definition of self-build. However, there is ample government guidance on the definition of self-build dwellings.</p> <p>For the reasons outlined above it is clear that the Council has no control over the provision of self-build plots and has no real way of restricting any dwelling to be provided for self-build, unless it is confirmed that the LPA are either not meeting their self-build duties or are absent/silent on the matter of self-build policy. The SPD therefore has no real use.</p>		
1. Introduction	Kettleburgh Parish Council (Sonia Frost)	41	No comment	Comment noted	No change
1. Introduction	Kettleburgh Parish	42	No comment	Comment noted	No change

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
	Council (Sonia Frost)				
1. Introduction	Peter Raffell	49	<p>Although I am not currently resident within the East Suffolk boundary, I have strong ties to the area and have moved in the last few years from my own self build property in the East Suffolk district. As such I have experienced all the difficulties of finding an affordable plot on which to build, taking the project through to completion, and finally being able to enjoy living in the property. In my case 12 very enjoyable years.</p> <p>My comment is regarding Policy SCLP5.9: Self Build and Custom Build Housing</p> <p>I believe that simply requiring developers to market self-build plots for a period of 12 months will have little value to the policy. Potentially the developer could massively inflate the price of any plot in order to make the land unattractive and therefore available to themselves. This would enable the developer to subsequently build on the plot themselves.</p> <p>I would suggest that a greater incentive should be created. This could be by extending the marketing period to 12 months after completion or possibly, at least, the start of the last house on the development.</p> <p>This approach would increase the cost of holding the plot unsold and converting to a developer homes, and therefore encourage the developer to sell the plot at an</p>	<p>The price of a serviced plot is addressed via the marketing strategy and will be considered by the Council, and only accepted if deemed reasonable. This will help avoid artificially inflated pricing.</p> <p>The 12-month marketing period is a minimum period, and the Council encourages longer if sales are struggling. The minimum 12-month marketing period for each plot will only commence when the agreed marketing strategy is initiated, the plot has been serviced, has defined boundaries, and is available for immediate purchase. The Council will circulate marketing information about plots to those on the Council custom and self-build housing register.</p>	No change

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			<p>affordable price. There would then be no need for the developer to maintain an extended presence on the site.</p> <p>There might be alternative mechanisms to provide a similar incentive, but without such incentives I suspect the policy as is, will be circumvented and not achieve its potential. One only has to look at the poor provision of affordable housing under existing policies.</p>		
1. Introduction	North Cove Parish Council (Joan Pryce)	53	The Parish Council is concerned about the increased use of the private car if properties are situated further from shops, bus routes, schools, employment. Rural areas often lack internet deliveries. Accessing plots and sites can be dangerous with reduced visibility splays and light pollution as many houses seem to have huge windows and no blinds or curtains. Interruption of green corridors and hedge removal also.	All of the matters mentioned are material considerations to the determination of planning applications and would therefore be carefully considered. The local plans contain policies which set out where new development can take place and how it should be designed with respect to highway safety and biodiversity.	No change
1. Introduction	Martin Wenyon	56	To achieve its targets for custom and self-build planning permissions the Council seems to be relying on large developments of over 100 where 5 % must be custom or self-build. This is understandable if you are trying to meet a target, but it takes no account of the wishes of the majority of the individuals on the register who may not wish to be on a large housing development. It would be interesting to survey the register to find out exactly what they are looking for. As an individual on the register I would be interested in a single plot or with a small group of self-builders and in no way would I wish to be tucked	As noted by the respondent, the Council's policy approach to the delivery of custom and self-build housing is primarily through the delivery on developments of 100 or more homes of 5% of such homes to be custom and self-build housing on serviced plots. It is not possible to introduce policy in the SPD	No change

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			away in a large development. This may possibly be a common wish amongst self-builders.	that would conflict with the Local Plan policies, but the Council will of course review the implementation of planning policies through Local Plan reviews as appropriate.	
1. Introduction	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	58	<p>These representations have been prepared by DLP Planning Ltd (DLP) and Ingleton Wood LLP on behalf of their respective client's Larkfleet Group Ltd, Chenery's Farm Partnerships and the Beccles Townlands Trust in response to the Draft East Suffolk Custom and Self-Build Housing Supplementary Planning Document October 2023.</p> <p>This response is made jointly on behalf of the individual client interests in land comprising the Beccles and Worlingham Garden Neighbourhood. For clarity purposes, Larkfleet Group Ltd have an option on a substantial part of land comprising the Beccles and Worlingham Garden Neighbourhood (known as the 'eastern parcel') and the Chenery's Farm Partnerships and the Beccles Townlands Trust represent the interests of the 'western parcel'.</p> <p>These representations are made insofar as they relate to the development and delivery of the Beccles and Worlingham Garden Neighbourhood, a strategic allocation that was adopted under Policy WLP3.1 of the Waveney Local Plan (March 2019) for approximately 1,250 new dwellings. The delivery of the Garden</p>	Comment noted	No change

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			<p>Neighbourhood is subject to site specific requirements through the allocation policy, which were tested and examined through the evidence base that supported the production of the Local Plan.</p> <p>It is accepted by all parties that the Beccles and Worlingham Garden Neighbourhood will be required to make provision for self-build and custom houses within the development to make the delivery of the site acceptable in planning terms and in accordance with the adopted Waveney Plan Policy WLP8.3.</p>		
1. Introduction	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	68	<p>Our clients agree and support the requirement for the Beccles and Worlingham Garden Neighbourhood allocation to make provision for self-build or custom plots as outlined in Local Plan policy WLP8.3 (Self Build and Custom Build) of the Waveney Local Plan (adopted March 2019).</p> <p>Overall, our clients intend on delivering a development that provides a mix of housing for the local community which are high-quality and sustainable. The design of housing across the development will be controlled via a design code, which will be agreed with the council and will include both the developer led housing as well as self-build or custom plots to ensure the development is cohesive, attractive and complementary to the existing housing within Beccles and Worlingham.</p> <p>It is considered that the draft SPD could have implications relevant to the delivery of the Beccles and Worlingham Garden Neighbourhood and it is our clients' view that the</p>	<p>Custom and/or self-build homes must meet the definition in the legislation. The level of design freedom afforded to initial occupants will need to be substantial enough for the initial occupant to have a primary input into the final design and layout of their home.</p> <p>The preparation of design codes for custom and self-build housing will need to follow the principles set out in the SPD. The starting point will be to secure as much design freedom for initial occupants as possible and only fix design parameters</p>	No change

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			<p>12-month marketing period of self-build or custom plots should not be constrained by the need for plots to be serviced and available for immediate purchase. Whilst there will likely be a lower level of customisation available on the Beccles and Worlingham Garden Neighbourhood site, due to the scale of the development, there is a need to ensure that early marketing of custom and self-build housing across the site is completed before the site wide developer has moved off the site, in the event that plots are not sold within the marketing period and are amended to open market or affordable housing.</p>	<p>where demonstrably necessary. A site of the scale of the Beccles and Worlingham Garden Neighbourhood can comfortably accommodate areas for custom or self-build homes which allow greater design freedoms and do not need to be constrained by a whole-site design code.</p> <p>The minimum 12-month marketing period will only commence once the agreed marketing strategy has been initiated, plots are serviced, have defined boundaries, and are available for immediate purchase. This is consistent with the requirements of policies SCLP5.9 and WLP8.3. Marketing can begin beforehand, however this will not trigger the minimum 12-month marketing period on its own. Serviced plots for custom or self-build homes can be provided earlier in the build schedule if there are</p>	

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				concerns about the main developer moving off the site.	
1. Introduction	Suffolk County Council (Natalie Winspear)	71	<p>Flooding</p> <p>SCC, as the Lead Local Flood Authority (LLFA), has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. From an LLFA perspective, most of the development covered by this guidance will be below the criteria for assessment, but it is important that self-build plots are considered strategically by developers. SCC encourage self-builders to use SuDS principles to manage the runoff from their plots.</p> <p>Where self-build plots are proposed as part of a wider scheme, surface water should be managed as part of the site-wide surface water drainage strategy.</p> <p>SCC would recommend the insertion of the following text:</p> <p>“For self-build plots as part of wider developments: Strategic development should consider the potential impermeable area of self-build plots in the wider drainage strategy. This should be at least 60% impermeable area per plot. If infiltration is viable developers should consider the required size of plot soakaways and that the plot is suitably sized to allow soakaways clearance to buildings (5m).</p>	<p>Flooding</p> <p>The Council agrees that site wide infrastructure, including drainage infrastructure, must be dealt with in a strategic manner by the site wide developer and not left to individual custom and self-builders. This is set out in paragraph 7.11. The proposed text in relation drainage has been added to the SPD below paragraph 7.11.</p> <p>Health and wellbeing</p> <p>Table 2 provides examples of potential design parameters and is not an exhaustive list. M4(2) space standards are captured by building regulations and other Local Plan policies.</p> <p>Transport</p>	<p>Flooding</p> <p>The County Council’s proposed text in relation to drainage has been added below paragraph 7.11: “For custom and self-build plots as part of wider developments, the potential impermeable area of custom and self-build plots should be considered in the wider drainage strategy. This should be at least 60% impermeable area per plot. If infiltration is viable site wide developers should consider the required size of plot soakaways and that</p>

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			<p>For single plot self-build proposals: Design of self builds should consider SuDS principles in the management of surface water on-plot. This should include the use of pervious surfaces, raingardens, and other SuDS techniques where appropriate. Please see the Lead Local Flood Authority technical guidance¹.”</p> <p>Health and Wellbeing</p> <p>SCC would recommend inclusion of the following additions as part of Table 2 Design Parameter examples:</p> <p>“Creation of open/Green/recreational space (E.g. Size, shape, purpose) M4(2) provisions (E.g. Quantity of Custom and Self-build units built to M4(2) standards)”</p> <p>Transport</p> <p>For self-build plots that are provided as part of a wider development site, SCC would require that these dwellings are assessed as part of the wider scheme in terms of Transport assessment, and are well connected to services and facilities both within the site and beyond. As with all development, priority should be given to walking and cycling in line with Suffolk Design Streets Guide principles. All parking as part of the wider development should be provided in accordance with the Suffolk Guidance for Parking (2019) or any successor documents.</p>	<p>Reference to “or any successor document” in relation to the application of the County Council’s parking guidance has been added to paragraph 8.24.</p> <p>Reference to “accessible via an obstruction free and direct route”, in relation to cycle storage, has also been add to paragraph 8.24.</p> <p>Reference to “bin storage and presentation areas must be located outside the public highway” has been added to paragraph 8.25.</p> <p>General</p> <p>The NPPF was updated the day before the consultation commenced (5 September 2023) and it was therefore not possible to amend the draft SPD. However, the SPD has since been amended to refer to the 2023 NPPF.</p>	<p>the plot is suitably sized to allow soakaways clearance to buildings (5m).</p> <p>For single plot custom and self-build proposals, the design of custom and self-build homes should consider SuDS principles in the management of surface water on-plot. This should include the use of pervious surfaces, raingardens, and other SuDS techniques where appropriate. Please see the Lead Local Flood Authority technical guidance.¹</p> <p>1 https://www.suffolk.gov.uk/asset-library/2023-</p>

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			<p>For individual self-build plots, this type of development is likely to be in a fairly rural or village location, so intrinsically car dependant. For larger self-build-only schemes, Suffolk Design Streets Guide principles should still be applied, along with adherence to the Suffolk Guidance for Parking (2019) or any successor documents.</p> <p>Therefore, we would expect most in ESC to be fully compliant with the Suffolk Design: Streets Guide and SCC parking guidance.</p> <p>We note that the SPD has referred to the Suffolk Guidance for Parking, however SCC would suggest that the SPD also refer to “any successor document”, as previously recommended.</p> <p>Paragraph 8.24 sets out the need for considering the location of cycle storage – such storage needs to be accessible for users through the provision of an obstruction-free route to encourage take-up of cycling, by reducing the physical barriers to accessing a bicycle in its storage location.</p> <p>Paragraph 8.25 should specify that bin storage and presentation areas should be provided on-plot and outside of the public highway where they may present an obstruction to highway users.</p> <p>General</p>		<p>sf3967-scc-suffolk-flood-risk-appendix-a2.pdf</p> <p>Transport</p> <p>Paragraph 8.24 has been amended to include “or any successor document” in relation to the County Council’s parking guidance.</p> <p>Paragraph 8.24 has also been amended as follows: “Cycle storage must be covered, and secure, and <u>accessible via an obstruction free and direct route.</u>”</p> <p>The following sentence has been added to paragraph 8.25 “<u>Bin storage and presentation areas must be</u></p>

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			<p>A minor note is that the document refers to NPPF 2021.</p> <p>1 https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf</p>		<p><u>located outside the public highway.”</u></p> <p>General</p> <p>All references to the 2021 NPPF have been amended to the 2023 NPPF.</p>
2. What is Custom and Self-build Housing?	Anonymous	2	The draft SPD is very clear and easy to comprehend.	Comment noted	No change
2. What is Custom and Self-build Housing?	Badger Building (E.Anglia)Ltd (Edward Gilder)	15	The use of an example in the Netherlands may have relevance in the context of design, but the process of planning and delivery is not the same as in the UK and this should be noted, perhaps with a footnote.	While it is of course correct that the Netherlands operates a different planning system to our own, it is not considered necessary to explicitly point out.	No change
2. What is Custom and Self-build Housing?	Kettleburgh Parish Council (Sonia Frost)	43	The design of the build would need to be appropriate and match the local environment and existing housing, even if there is no completed Neighbourhood Plan.	A custom or self-build home must allow design freedom to the initial occupant, in accordance with the ethos of custom and self-build housing, and also consider the impacts of design on the character and appearance of the area, especially when within a heritage context. Design codes allow for	No change

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				controls over the design of the homes to be set where necessary.	
2. What is Custom and Self-build Housing?	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery’s Farm Partnerships, Beccles Townlands Trust and Allison Homes	59	<p>Whilst we have no objections in principle with the spectrum indicated in Figure 1 and the relevant descriptions provided in Table 1, noting that there is a lower degree of customisation available for larger scale developments delivered by volume housebuilders, the thresholds for each element of the spectrum have not been identified and clarity on this would be welcomed to provide guidance on the level of customisation expected at differing development scales.</p> <p>It is anticipated that the Beccles and Worlingham Garden Neighbourhood would offer a lower degree of customisation on the external built form of custom or self-build units due to the requirement for a complementary design code to be followed on site in order to ensure that housing is complementary to the wider development, this is discussed in Section 8 of the consultation document and below.</p>	<p>Custom and/or self-build homes must meet the definition in the legislation and development proposals must demonstrate how this is achieved. The Custom and Self-Build Delivery Statement in appendix 2 will assist with this. It is not appropriate to work back from a standard house type, adding minimal design freedom until a custom and self-build housing bar is met.</p> <p>The correct approach in preparing a design code for custom and self-build housing is, as set out in section 8 (Design codes), to secure as much design freedom as possible for initial occupants and only restrict design freedom where demonstrably necessary. However, to provide clarity on this matter paragraph 2.8 and table 1 have been</p>	<p>The following sentence has been added to paragraph 2.8: “In determining the appropriate degree of design freedom for initial occupants, consideration will need to be given to section 8 (Design Codes).”</p> <p>Table 1 has been amended in relation to the ‘How is it custom and self-build housing?’ column and ‘Choice of pre-approved designs’ row, as follows: “Initial occupants will usually not be involved in the preparation of the design code and</p>

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				<p>amended in relation to 'choice of pre-approved designs'.</p> <p>Large sites such as the Beccles and Worlingham Garden Neighbourhood can be comfortably laid out in such a way to accommodate areas of custom or self-build homes which are not of the same appearance as standard house types built elsewhere on the development. It is not accepted that large scale sites should provide a lower degree of customisation.</p>	<p>therefore will have no input into the house design options. It is therefore of critical importance that the <u>pre-approved designs</u> code offers a substantial degree of design and layout customisation for initial occupants. <u>The design options should demonstrate consideration as to how design freedom is offered to initial occupants over matters including, but not limited to, the:</u></p> <ul style="list-style-type: none"> - <u>Size and shape of the home, including outbuildings,</u> - <u>Position, size and shape of all windows and doors across every elevation,</u>

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					<ul style="list-style-type: none"> - <u>Materials across every elevation and roof,</u> - <u>Internal layout (e.g. location, size and shape of rooms),</u> - <u>Build specification (e.g. insulation, heating configuration, heat pumps),</u> - <u>Sustainability features (e.g. solar panels, solar hot water, triple glazing), and</u> - <u>Finishes (e.g. kitchen, bathroom, flooring, lighting)."</u>
3. Custom and Self-build Housing Data	Badger Building (E.Anglia)Ltd (Edward Gilder)	16	How many of the 580 on the East Suffolk register are registered elsewhere?	The Council does not have data on whether those signed up to our custom and self-build register are signed up to other local planning authority registers.	No change
3. Custom and Self-build Housing Data	Kettleburgh Parish Council (Sonia Frost)	44	<p>No comment to add regarding the presented data above.</p> <p>But does this take into account the historical plots that have footing commenced that have lapsed over several years?</p>	The data does not cover planning permissions or completions.	No change

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3. Custom and Self-build Housing Data	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	60	<p>Details provided on the Council's self-build and custom build register identifies that for Beccles and Worlingham there are a total of 71 individuals who are interested in a plot within these parishes¹.</p> <p>It is acknowledged that the evidence provided is based on an up-to-date register which is updated annually as required by the Self-build and Custom Housebuilding Act 2015. What is not clear however is whether these individuals have also registered an interest in plots within other parishes in the District.</p> <p>¹ https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/self-build-and-custom-build/key-statistics-from-the-self-build-and-custom-build-register/</p>	<p>Those that have registered an interest in a custom and self-build plot in Beccles and Worlingham may have registered an interest in other parishes within East Suffolk as well as other local authority registers.</p> <p>It is worth noting that, in addition to the 71 registrants for Beccles and Worlingham, a further 169 registrants identified that they are interested in a plot in any East Suffolk parish and around 50% would consider a plot outside of their preferred location(s).</p>	No change
4. Affordable Custom and Self-build Housing	Badger Building (E.Anglia)Ltd (Edward Gilder)	17	This is a useful explanation of the relationship of custom homes and self-build housing and affordable housing, and where it fits in to the planning and application process.	Support welcomed	No change
4. Affordable Custom and Self-build Housing	Pigeon Investment Management Ltd (William Page)	35	Section 4 sets out that solely custom and self-build housing developments should deliver a policy compliant affordable housing scheme. The SPD should make it clearer why it is in conflict with paragraph 65 (now 65) of the National Planning Policy Framework, which outlines	NPPF paragraph 66 (previously 65) does not set out that custom and self-build housing developments are exempt from affordable housing, simply that they are	Paragraph 4.6 has been amended as follows: "Where it is <u>proposed, and deemed</u>

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			<p>that custom and self-build is exempt from this requirement.</p> <p>Paragraph 4.5 of the draft SPD outlines the mechanisms for delivering affordable custom and self-build housing in a manner which meets both the affordable housing definition (NPPF glossary) and the custom and self-build housing definition (Self-build and Custom Housebuilding Act 2015). We suggest that in addition to the existing mechanisms listed, an option to provide commuted sums as off-site provision is also included. This offers more flexibility where the provision of affordable housing may not be achievable on site.</p> <p>Paragraph 4.6 stipulates that an affordable housing scheme should be submitted with the outline planning application to demonstrate several details. We suggest that there should also be an option that provision of these details can be conditioned or form part of a S106 agreement, as some of these details will not be known at outline stage.</p>	<p>exempt from the NPPF provision for 10% of affordable housing to be made available for affordable home ownership. Further clarity is provided in the NPPF Glossary which states that Self-build and custom-build housing can provide either market or affordable housing. The SPD is therefore not in conflict with paragraph 66 (previously 65) of the NPPF.</p> <p>Paragraph 4.5 sets out mechanisms that could potentially meet both the affordable housing and custom and self-build definitions.</p> <p>An affordable housing scheme could be submitted with an outline planning application, a reserved matters application, or prior to commencement. Paragraph 4.6 has been amended to clarify this position.</p>	<p><u>acceptable, that affordable housing is delivered as affordable custom and self-build housing, a</u>An affordable housing scheme should be submitted in accordance <u>with prior to or in conjunction with the submission of the first reserved matters</u> outline <u>planning application or prior to commencement (whichever is sooner). In addition to the provisions set out in the Council's Affordable Housing SPD, the affordable housing scheme will need to demonstrate."</u></p>

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4. Affordable Custom and Self-build Housing	Kettleburgh Parish Council (Sonia Frost)	45	With reference to infrastructure, transport, utilities and employment, Kettleburgh is completely lacking in these essential services. An obligation to provide the necessary services to make the development of custom and self-build housing sustainable should be captured within the register.	All planning applications for housing, irrespective of whether for custom and self-build housing or another form of housing, are subject to consideration of the sustainability of a given location, including with regard to local services and facilities.	No change
4. Affordable Custom and Self-build Housing	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	61	The draft SPD specifies that for developments of 100+ dwellings, the affordable housing dwellings to be delivered should be entirely within the developer-built element of the site and not delivered as affordable custom and self-build housing i.e. they should not form part of the 5% requirement. Our clients agree with this recommended approach for the delivery of affordable housing on sites such as the Beccles and Worlingham Garden Neighbourhood.	Comment noted.	No change
4. Affordable Custom and Self-build Housing	Caroline Price	69	Paragraph 4.1 sets out that 'Custom and self-build housing is not by definition affordable'. I have a big objection in principle. Surely the only housing we should be providing in the country is social housing. Even so-called 'affordable' housing is not easily affordable by local people on the average salary in the area.	The Council must plan for all forms of housing needed across East Suffolk. The local plans for the district contain policies for the delivery affordable housing and other forms of housing.	No change

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5. Serviced Plots	Badger Building (E.Anglia)Ltd (Edward Gilder)	18	<p>It is highly unlikely that developers with self and custom build plots on their sites will provide compounds, other than within the boundaries of the designated plots. Access to a developer's compound as a shared compound, is unlikely to be an insurable risk for a developer.</p> <p>The advice at section 5.4 is sound.</p>	Every custom and self-build plot will need access to a construction compound and material storage area. This will need to be set out in the design code and plot passport to provide certainty to potential plot purchasers.	No change
5. Serviced Plots	Anglian Water Services Ltd (Tessa Saunders)	34	<p>Anglian Water notes that serviced plots are most likely to be delivered as a proportion of a larger housing site, where the developer will have already engaged with us on connecting to our water and wastewater networks to ensure that the infrastructure can be delivered in a timely way for the whole site. However, there may also be circumstances where there might be a stand-alone site of serviced self-build plots coming forward, and in such cases we would encourage the applicant to engage with us as early on as possible to ensure the necessary infrastructure can be delivered to facilitate the marketing of serviced plots. There are some circumstances where delivery of certain infrastructure can have a significant delivery timescale such as communities with a vacuum sewer system for example. The SPD could helpfully reference the need for early engagement with infrastructure providers to ensure the messaging is clear.</p>	The Council agrees that early engagement with infrastructure providers should be encouraged to ensure timely delivery. As such, a new sentence below paragraph 5.2 has been added, which states "Early engagement with relevant infrastructure providers is recommended to ensure the timely delivery of infrastructure and other development."	A new sentence below paragraph 5.2 has been added, which states "Early engagement with infrastructure providers is recommended to ensure the timely delivery of infrastructure and other development."
5. Serviced Plots	Pigeon Investment Management Ltd (William Page)	36	<p>Paragraph 5.5 (now 5.6) suggests that there must be a minimum 12-month marketing period from when plots are serviced. The SPD should allow for greater flexibility as in some cases the outline planning permission may lapse before the marketing period is satisfied, depending on the site context. For example, plots may not naturally</p>	The 12-month marketing period is an absolute minimum, and will only commence once the agreed marketing strategy has been initiated, plots are serviced,	Paragraph 5.5 (now 5.6) has been amended as follows: "Custom and self-build housing can

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			<p>become available because of design considerations until the end of the scheme. If the 12 month period for marketing only began at this point, and plots were able to be marketed before, then the plots could have been available for a number of years.</p>	<p>have defined boundaries, and are available for immediate purchase. Paragraph 5.5 (now 5.6) has been amended to provide clarity as to the marketing requirements as set out in section 10 (Marketing Strategy). Marketing can begin beforehand, however it will not trigger the minimum 12-month marketing period. Furthermore, major development sites are of a scale which makes them capable of being laid out in a way that facilitates the early delivery of the serviced plots, thereby allowing them to be completed whilst the main developer is still on site. Additionally, the model conditions in appendix 3 recommend an extended period for reserved matters applications for custom and self-build plots.</p>	<p>be marketed before being serviced; however, the minimum 12-month marketing period will only commence when plots are serviced <u>the agreed marketing strategy has been initiated, the plot has been serviced, has defined boundaries, and is available for immediate purchase.</u>"</p>
5. Serviced Plots	Kettleburgh Parish	46	The definition of access and connectivity also should include a reference to effective and realistic transport.	The statutory definition of a serviced plot of land set out in the Self-build and Custom	No change

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	Council (Sonia Frost)			Housebuilding Act 2015 cannot be altered by East Suffolk Council. However, consideration of other matters such as public transport will of course be important in the determination of planning applications.	
5. Serviced Plots	Martin Wenyon	57	This restriction does not seem logical if it restricts the many small plots that are suitable and desirable for self-builders.	It is not clear what the comment relates to.	No change
5. Serviced Plots	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	62	<p>In accordance with the definition of a serviced plot of land, as provided in the Self-build and Custom Housebuilding Act 2015 (as amended), our clients agree with the requirement for plots to be serviced with electricity, water, and waste water and have access to a public highway.</p> <p>It is also accepted that the plots will require a construction compound/s and material storage area/s to allow for the construction of dwellings separate to the developer led housing.</p> <p>However, we disagree with the recommendation that the minimum 12-month marketing period will only commence when plots are serviced. We do not consider that the requirement for the marketing period to commence following servicing to be necessary to allow for the successful marketing of these plots, given that the</p>	<p>The minimum 12-month marketing period will only commence once the agreed marketing strategy has been initiated, plots are serviced, have defined boundaries, and are available for immediate purchase. Paragraph 5.6 has been amended to provide clarity as to the marketing requirements as set out in section 10 (Marketing Strategy). This is consistent with the requirements of policies SCLP5.9 and WLP8.3. Marketing and publicity can begin beforehand, however it will not trigger the</p>	<p>Paragraph 5.6 has been amended as follows: "Custom and self-build housing can be marketed before being serviced; however, the minimum 12-month marketing period will only commence when plots are serviced <u>the agreed marketing strategy has been initiated, the plot has been serviced, has defined boundaries, and is</u></p>

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			<p>sale of plots would not be complete until after servicing has been installed.</p> <p>From a practical perspective, it is considered that this requirement could cause unnecessary delay to the delivery of dwellings on site and could result in unnecessary costs and programming issues in relation to the phasing of the remainder of the development. This is noted in paragraph 5.4 (now 5.5) of the SPD which states that there is a need to ensure that custom and self-build housing is completed before the site wide developer has moved off the site and there is specifically a need to further ensure that the site wide developer has not moved off site in the event that the 12-month marketing period is completed without the plots being sold.</p>	<p>minimum 12-month marketing period. Furthermore, major development sites are of a scale which makes them capable of being laid out in a way that facilitates the early delivery of the serviced plots, thereby allowing them to be completed whilst the main developer is still on site.</p>	<p><u>available for immediate purchase.”</u></p>
6. CIL	Campsea Ashe PC (Klaus Fortmann)	11	<p>We would like to express concern regarding the CIL policy linked to self-build properties, as we have experienced avoidance of paying CIL by claiming self-build, yet the builder did actually not inhabit the property and sold it within 6 month of completion.</p> <p>We are not quite sure why such CIL policy is in place, as new properties regardless of who builds them will add to infrastructure impact of the area.</p>	<p>The CIL Regulations 2010 (as amended) established by central government provide for the CIL exemption for self-build housing. East Suffolk Council cannot amend or revoke this statutory provision.</p> <p>In situations where parties benefiting from CIL exemption have not complied with the relevant procedures ESC should be notified of the specific details of each case so that we can</p>	No change

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				<p>determine whether the relevant procedure has or has not been followed.</p> <p>District CIL can be spent across the East Suffolk area, including within zero-rated CIL areas. Priority is given to the critical and essential infrastructure needed to support delivery of the Local Plans. A commitment to spending CIL in areas where there are zero-rated strategic sites is documented in the CIL Spending Strategy. Parish Councils can also apply for Local CIL Funding (match funding up to a maximum of £50k) for smaller local projects such as new allotments, new play equipment, walking and cycling routes.</p>	
6. CIL	Badger Building (E.Anglia)Ltd (Edward Gilder)	19	<p>CIL is a complicated topic and the guidance here is really useful in charting the way through the pitfalls of the legislation.</p> <p>Getting this wrong can have huge ramifications for a developer's cash flow and it would be really helpful if this advice could be circulated independent of the rest of the</p>	<p>In addition to the guidance contained in the SPD the Council provides CIL guidance on the ESC website. There is also guidance provided by central government in the PPG. That</p>	No change

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			document. In the days of paper applications an additional sheet attached to the forms would have been the way forward. Is there some way that this advice can be attached to the downloadable CIL forms to remind people of the risks and issues?	said, the Council is open to making improvements in the dissemination of guidance relating to CIL.	
6. CIL	Kettleburgh Parish Council (Sonia Frost)	47	The Parish Council would be concerned if no CIL was applicable to housing in a village such as Kettleburgh, where only poor infrastructure is in place. Remote location needs significant upgrading.	The CIL Regulations 2010 (as amended) established by central government provide for the CIL exemption for self-build housing. East Suffolk Council cannot amend or revoke this statutory provision.	No change
6. CIL	Kettleburgh Parish Council (Sonia Frost)	48	No comment	Comment noted	No change
6. CIL	Kettleburgh Parish Council (Sonia Frost)	50	Any design codes should be appropriate to the local design existing in the village, and they should be appropriate to the scale of a very small settlement such as Kettleburgh.	The Design Code section of the SPD sets out that consideration of site context is of particular importance in determining the design parameters which should guide the design of custom and self-build housing.	No change
6. CIL	North Cove Parish Council (Joan Pryce)	54	Local facilities would be used but no infrastructure contribution.	The CIL Regulations 2010 (as amended) established by central government provide for the CIL exemption for self-build housing. East Suffolk Council cannot	No change

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				<p>amend or revoke this statutory provision.</p> <p>North Cove Parish Council is in receipt of Neighbourhood CIL contributions from developments approved and commenced in the area, that are liable to pay some CIL. East Suffolk Council is not able to divert from legislative requirements in terms of not granting self-build exemptions where applicants are eligible. Parish councils are able to apply for Local CIL up to a maximum of £50K match funded, towards infrastructure projects within their area.</p>	
6. CIL	Caroline Price	70	<p>Why should custom and self-build housing be exempt from CIL? In the town where I live, a development of at least 40 self-build homes has been proposed. Can you explain to me why such a development would not have any impact on the infrastructure of the town?</p>	<p>The CIL Regulations 2010 (as amended) established by central government provide for the CIL exemption for self-build housing. East Suffolk Council cannot amend or revoke this statutory provision.</p> <p>The majority of parish councils are in receipt of</p>	No change

Draft SPD Section	Respondent	Comment ID	Comment summary	Council Response	Change Made
				<p>Neighbourhood CIL contributions from developments approved and commenced in their area, that are liable to pay some CIL. Not all developments are self-build or have other exemptions applied (for example statutory affordable housing exemption). East Suffolk Council is not able to divert from legislative requirements in terms of not granting self-build exemptions or other exemptions where applicants are eligible. Parish Councils are able to apply for Local CIL up to a maximum of £50K match funded, towards infrastructure projects within their area.</p>	
7. Phasing	Badger Building (E.Anglia)Ltd (Edward Gilder)	20	<p>The need for a phasing plan to address both the policy, but more importantly the CIL issues, is crucial and again needs to be flagged up at the pre-application stage in some way if possible. Perhaps this topic, linked to CIL could be run as part of a developers forum or as a free standing seminar for developers and agents.</p>	<p>It is correct that phasing is important in relation to CIL and the effective delivery of large developments. Consideration will be given to further publicity material in relation to CIL beyond what the Council already publishes.</p>	No change

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7. Phasing	Pigeon Investment Management Ltd (William Page)	37	Paragraph 7.3 expects all custom and self-build plots to be marketed and available for immediate purchase when not more than 50% of the total dwellings are occupied (where justification is provided to demonstrate why custom and self-build plots may not be delivered early in the build programme). We suggest that this should be considered on a flexible site-by-site masterplan basis, instead of using more rigid deadline for availability at 50% of total occupation. As it is currently, larger applications would need to market a significant number of custom and self-build plots early, which may not be possible depending on the individual context on the site.	The provisions in paragraph 7.3 are considered reasonable in all respects. Larger development sites would be able to be laid out in such a way to allow phases of serviced plots to be provided in a timely way.	No change
7. Phasing	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	63	<p>It is agreed that the delivery of self-build and custom plots will be outlined and agreed in a S106 agreement, and that the trigger proposed for their delivery in relation to 50% of total dwellings is considered reasonable.</p> <p>However, in respect of the requirement for plots to be available for 'immediate purchase' is not considered to be reasonable given the acknowledgement at paragraph 7.8 which notes that custom and self-builders have "less readily available funding sources".</p> <p>Paragraph 7.10 states that "For large strategic sites consideration will need to be given to marketing clusters of custom and self-build housing at different times to avoid a large number of custom and self-build plots flooding the market and resulting in unsold plots after the minimum 12-month marketing period." This is noted and will be factored into the phasing of any future application for the Beccles and Worlingham Garden</p>	Given that custom and self-builders may have less readily available funding sources it is important that custom and self-build plots are provided as early as possible in the phasing of developments. The minimum 12-month marketing period will only commence once the agreed marketing strategy has been initiated, plots are serviced, have defined boundaries, and are available for immediate purchase. This is consistent with the requirements of policies SCLP5.9 and WLP8.3. Marketing can begin	No change

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			Neighbourhood. Similarly, the requirement for site wide infrastructure to be delivered by the site wide developer and for description of development to outline that the development will be phased is noted and agreed.	beforehand, however it will not trigger the minimum 12-month marketing period.	
8. Design Codes	Forestry Commission (Neil Jarvis)	5	<p>The Forestry Commission recommends the increased use of home-grown timber in construction to replace, wherever possible, the use of brick, concrete, and steel, all of which release large quantities of CO2 in their manufacture, whereas trees sequester CO2, which is then locked into the building throughout the lifetime of that building. Home-grown timber can be sourced either from Forest England or private forestry estates.</p> <p>The use of home-grown timber is promoted by H.M. Government (e.g. the Governments 25 Year Plan and the Clean Growth Strategy).</p> <p>Other essential facts to include in a building design code:</p> <ul style="list-style-type: none"> - The UK imports around 80% of the wood it consumes annually, we are the second biggest timber importer in the world - All of the woodlands in England have been managed for fuel and timber production in the past and this has shaped habitats that support the biodiversity we value today. - Increasing levels of woodland management by increasing demand for locally grown timber can help improve the habitat condition of neglected woodlands and also allow owners to address tree disease problems and increase resilience to climate change. 	<p>The Council supports the delivery of environmentally sustainable developments, as demonstrated through the Council's Sustainable Construction SPD, which provides detailed guidance relating to sustainable building materials, construction methods and technologies. The Sustainable Construction SPD is reference in the SPD.</p> <p>We do not consider it necessary to reference specific building materials, such as wood, as the nature of custom and self-build housing requires the design of homes to be the domain of the initial occupant.</p>	No change

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			The use of timber in construction and wood for heat and power generation and woodland creation could play an important role in the much needed green economy.		
8. Design Codes	Historic England (Marsh, Andrew)	12	<p>I can confirm that while we do not have any specific comments to make at this stage, we welcome the numerous references to the historic environment throughout the SPD, particularly paragraphs 8.5 - 8.7, which we support. Notwithstanding this we suggest that paragraph 8.5 should be expanded to clarify that the same considerations would apply to all designated heritage assets and their settings (e.g. scheduled monuments and registered parks and gardens), and not just listed buildings and conservation areas.</p> <p>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 where we consider that these would have an adverse effect upon the historic environment. We hope that the above comments of assistance.</p>	Support welcomed. The Council agrees that further clarity can be provided by identifying all designated heritage assets within paragraph 8.5.	<p>The final sentence of paragraph 8.5 has been amended as follows:</p> <p>“For example, if the site lies within a conservation area or its setting, or the setting of a listed building <u>(or other designated heritage asset, such as a scheduled monument or registered park and garden)</u> it will be important for the design code to exert some control over external appearance and scale.”</p>
8. Design Codes	Badger Building	21	How will the design code be evaluated as part of the application process. By the planning officer or by the	The Council will assess design codes in the same way we	No change

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	(E.Anglia)Ltd (Edward Gilder)		council's design officer? How prescriptive can they be where developers are seeking to ensure that what is built sits comfortably alongside their own schemes? Where self-builders don't agree with the design code is it open to them to seek to change it - and if so by what process? Another planning application perhaps?	<p>assess design quality through planning applications, drawing on the expertise of the Design and Heritage Team and planning officers.</p> <p>It is essential that initial occupants have the primary input into the design and layout of their home, and so as set out in paragraph 8.5 the starting point will be to secure as much design freedom as possible and only restrict design freedom where demonstrably necessary. Careful consideration should be given not only to the design parameters set out in the design code but also to the location of plots within a larger development.</p> <p>The process by which a self-builder could seek to design a home contrary to the design code would vary depending on the preceding planning application process. The extent to which a self-</p>	

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				builder's proposed house design would deviate from the design code would of course be a material consideration, and would influence the potential planning application route and outcome.	
8. Design Codes	Anglian Water Services Ltd (Tessa Saunders)	33	Anglian Water welcomes the reference to other parameters that might be included within the Design Code, such as Environmental Sustainability. We support the inclusion of rainwater harvesting as an example, but we would also welcome the inclusion of water efficiency measures within this section. As a region identified as seriously water stressed we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater/storm water harvesting and reuse, and greywater recycling - including going beyond the optional technical standard of 110 litres per person per day. Often, custom and self-builders can be more environmentally conscious and have the freedom to implement such measures as they might not have the opportunity to include these in traditional new builds or it can be more expensive to retrofit. These measures can help reduce energy and water bills, whilst also helping to reduce potable water use and demonstrating the benefits of installing these technologies to the wider custom/self build community.	Both the Council's Suffolk Coastal Local Plan and Waveney Local Plan include policies in support of the water efficiency optional technical standard of 110 litres/person/day. The SPD cannot conflict with Local Plan policy and so a different water efficiency target cannot be included within the SPD. However, we agree that water efficiency measures should be included within Table 2 under 'Environmental Sustainability'.	The environmental sustainability row of Table 2 has been amended to include " <u>water efficiency</u> "
8. Design Codes	Pigeon Investment	38	On the whole we support the requirement for design codes, due to both their strengths as a planning tool and	Design codes could be submitted with outline	Hybrid planning applications under

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	Management Ltd (William Page)		<p>their ability to assist with marketing custom and self-build plots.</p> <p>We suggest that it would be helpful if the SPD clarified that a Design Code can be conditioned as part of a planning permission and that it doesn't always have to be addressed at outline stage.</p> <p>Paragraph 8.9 outlines that it is of critical importance that custom and self-build homes are not segregated from the wider development. Typically, custom and self-build purchasers will desire something different to what a housebuilder provides, so inevitably this will cause a degree of segregation. Whilst we agree with the need for integrated communities, custom and self-build homes being segregated from the rest of the development does not necessarily mean that they wouldn't be connected and serviced. There are also differences between the two plot types - though custom-build housing arguably will have less segregation, self-build inevitably will because of its bespoke nature, and buyers will likely favour plots to the edge of the development, rather in the centre. Again, this needs to be considered on a flexible, site by site basis, as the context will be different for every scheme.</p>	<p>applications or conditioned to outline permissions and submitted and agreed prior to custom and self-build reserved matters. Table 3 of Appendix 1 (Recommended Format of Planning Applications) has been amended to clarify the recommended design code submission process.</p> <p>Within paragraphs 8.8 and 8.9 the Council acknowledges the need to cluster custom and self-build homes to address health and safety, and construction management matters, as well as the need to design development comprehensively in a manner that avoids segregating custom and self-build homes from the wider development. However, to provide further clarity paragraph 8.9 has been amended.</p>	<p>the 'more than one custom and self-build home' development type of Table 3 of Appendix 1 (Recommended Format of Planning Applications) has been amended as follows:</p> <p><u>"3. Design code and pPlot passport agreed prior to marketing."</u></p> <p>Paragraph 8.9 has been amended as follows:</p> <p>"It will however be of critical importance that the development is planned in a comprehensive manner and that custom and self-build homes are not segregated from the wider development <u>by,</u></p>

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					<u>for example, a lack of cycling and walking infrastructure.”</u>
8. Design Codes	North Cove Parish Council (Joan Pryce)	55	Light pollution can be caused by large areas of glass without blinds or curtains in areas without streetlights, and security lights. Such light pollution can harm ‘dark skies’. Hedges removed to facilitate access can damage wildlife corridors.	Light pollution and hedge removal are important issues that relate to all forms of development. The SPD seeks to address matters that specifically relate to custom and self-build housing.	No change
8. Design Codes	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery’s Farm Partnerships, Beccles Townlands Trust and Allison Homes	64	<p>It is acknowledged that design codes play an important role in the delivery of custom and self-build housing, in maximising the level of design freedom for initial occupants while demonstrating a coherent and high-quality development that responds to its context.</p> <p>It is expected that on sites such as Beccles and Worlingham Garden Neighbourhood there will be a lower level of customisation available. However, it is noted that the design code must be agreed prior to marketing plots for sale to provide certainty for potential plot purchasers as to what can and cannot be built on each plot.</p> <p>A site-wide design code will be required for the delivery of Beccles and Worlingham Garden Neighbourhood, given the scale of the development and the likelihood for multiple housebuilders to be involved in the delivery of the development.</p>	<p>The level of design freedom afforded to initial occupants will need to be substantial enough for the initial occupant to have a primary input into the final design and layout of their home.</p> <p>The preparation of design codes for custom and self-build housing will need to follow the principles set out in the SPD. The starting point will be to secure as much design freedom for initial occupants as possible and only fix design parameters where demonstrably necessary. It is not accepted that large sites should</p>	No change

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			<p>As such, it is considered that design consideration and coding for custom and self-build plots will be included in the site-wide design code, to ensure a degree of consistency across the development in terms of design, materials and layouts to be provided.</p> <p>It is noted that where custom and self-build housing forms part of larger residential developments it will be important to consider how the construction of custom and self-build homes will interact with the construction of homes being constructed by the relevant house builder in a health and safety compliant manner. Further to this the location of custom and self-build plots in relation to developer housing needs to be considered to allow for appropriate access during construction. There is therefore a presumption that custom and self-build plots will be clustered together. Our clients agree with the proposed clustering of custom and self-build plots.</p>	<p>provide a lower level of customisation.</p> <p>Site-wide design codes for major sites must allow for the design freedom required for custom and self-build homes and incorporate them into the overall layout accordingly.</p>	
9. Plot Passports	Badger Building (E.Anglia)Ltd (Edward Gilder)	22	Does this section not just repeat the information found in the previous section on Design Codes? These two sections could easily be amalgamated.	It is correct that the Design Codes and Plot Passports sections are heavily related, however given the significance of plot passports to the marketing of plots it is considered necessary that a separate concise section is provided to highlight the key differences between design codes and plot passports.	No change
9. Plot Passports	Pigeon Investment	39	Similarly to design codes, we support the requirement for plot passports for custom and self-build developments	Comment noted	No change

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	Management Ltd (William Page)		due to their value as a planning tool and at the marketing stage.		
9. Plot Passports	Kettleburgh Parish Council (Sonia Frost)	51	No comment	Comment noted	No change
9. Plot Passports	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes	65	The provision of plot passports which provide potential custom and self-build plot purchasers with the key design and development parameters that must be abided by in the design and construction of a custom and self-build home on the plot, is agreed and this will form part of the design code for the wider site.	Comment noted	No change
10. Marketing Strategy	Badger Building (E.Anglia)Ltd (Edward Gilder)	23	The advice contained here follows on from that in the Local Plan and appears to be clear and unambiguous.	Support welcomed	No change
10. Marketing Strategy	Pigeon Investment Management Ltd (William Page)	40	Paragraph 10.7 (now 10.8) outlines that for large developments providing a percentage of dwellings as custom and self-build homes, which total at least 15 custom and self-build plots, marketing should not commence for more than 15 plots at the same time.	Given the demand for custom and self-build housing nationally and in East Suffolk it is considered highly unlikely that	Paragraph 10.12 (now 10.13) has been amended to change 'could

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			<p>Furthermore, subsequent clusters of no more than 15 plots should only commence at least 12 months after the marketing of the previous cluster of plots commenced. Though we support avoiding flooding the market, this again should be considered on a site-by-site, masterplan basis. Large sites with more than 30 custom-self build plots would take 3 years to market and could cause the outline planning permission to lapse. Though phasing could get around this issue in some cases, it may not always be possible. Therefore, a degree of flexibility is suggested.</p> <p>Furthermore, greater flexibility is needed to take into account the differences in the custom and self-build demand by area, as in some cases the local interest may be enough to sell the custom and self-build plots quickly without needing to fulfil the 12-month period/15 plot limit per year. This would be helpful in cases where an outline permission may expire.</p> <p>Paragraph 10.12 (now 10.13) lists the evidence that could be used to demonstrate the marketing strategy used for a scheme. Whilst we agree with the evidence listed, we suggest that the use of the language 'could include' is too vague. The SPD should clarify what evidence 'must be included' to definitively satisfy the requirement.</p>	<p>developers will struggle to sell custom and self-build plots.</p> <p>In relation to paragraph 10.12 (now 10.13), we are satisfied that 'could include' should be changed to 'should include'.</p> <p>For custom and self-build homes a longer period for the submission of reserved matters is recommended as reflected by the model conditions in appendix 3.</p>	<p>include' to 'should include'.</p>
10. Marketing Strategy	Ingleton Wood LLP and DLP Planning Ltd	66	It is proposed that the 12-month marketing period will not commence until the marketing strategy has been initiated, plots have been serviced, boundaries have been defined, and plots are available for immediate purchase.	The submission of details confirming the marketing of custom and self-build plots is essential to ensure such plots	Paragraph 10.12 (now 10.13) has been amended as follows:

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	for and on behalf of Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes		<p>Further to this, it is recommended that only 15 plots should be marketed in any 12-month period. The reasonableness of this requirement is questioned due to the potential delay this may cause on larger residential and mixed-use developments. Given it is acknowledged that volume housebuilders will develop larger residential sites, and there will be a lower degree of customisation on these sites, with typical design and delivery control relating to pre-approved designs/layout and shell homes, as indicated in Section 2 of the SPD. It is considered that the marketing period could begin prior to plots being serviced and available for immediate purchase so that the delivery of these units coincides with the delivery of the developer-led dwellings.</p> <p>It is agreed that the permission and/or section 106 agreement should allow plots to be built out as non-custom and self-build homes if no sale has been agreed after the minimum marketing period. However, our clients consider that as the delivery of custom and self-build plots would be secured via a S106 agreement, rather than specifically via condition, there should not be a requirement for a section 73 variation of condition application to be submitted which is supported by evidence to demonstrate that marketing requirements have been fully complied with and the sale of the custom and self-build plot/s has not been agreed within the 12-month marketing period.</p>	<p>are appropriately marketed in accordance with the marketing period.</p> <p>It is not accepted that a lower degree of customisation for custom and self-build homes should be provided on larger sites.</p> <p>Publicity or marketing of serviced plots for custom or self-build homes can take place prior to the plots being serviced and available for immediate purchase, but this will not commence the minimum 12-month marketing period. This is consistent with the requirements of SCLP5.9 and WLP8.3.</p> <p>Paragraph 10.12 (now 10.13) has been amended to provide clarity in relation to the process by which non custom and self-build homes could be built on custom and self-build plots if plot sales are not agreed within the</p>	<p>"If a condition attached to the planning permission to which the custom and self-build plot/s relates sets out that a specified number of custom and self-build plots are to be delivered (including as part of the phasing plan condition), a section 73 variation of condition application evidence would be required <u>to be submitted to and agreed by the Council</u> supported by evidence to demonstrate that marketing requirements have been fully complied with and the sale of the custom and self-build plot/s has not been agreed</p>

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				<p>minimum 12-month marketing period. Consequential changes have been made to Appendix 3: Model Conditions and Appendix 4: Model s106 Obligations.</p>	<p>within the <u>minimum</u> 12-month marketing period.”</p> <p>Consequential changes to Appendix 3: Model Conditions have been made, as follows: “Condition to secure the <u>use of land</u> occupation of <u>for custom and self-build homes</u> Such a This condition <u>does not apply to</u> <u>developments that provide a percentage of homes as custom and self-build homes</u>, and may not be necessary if the <u>use of land for custom and self-build homes is secured through a s106 agreement.</u> planning</p>

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					<p>application's description of development refers to custom and self-build housing. If this isn't the case, a condition will be needed to secure the use of the land for custom and self-build housing.</p> <p>Model condition: [Number] homes hereby permitted shall be delivered as custom and self-build homes in accordance with section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended). Reason: To secure the use of the land for custom and self-build housing only.</p> <p><u>Condition to secure the number of custom and self-build homes</u></p>

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					<p><u>In relation to developments providing a percentage of homes as custom and self-build homes, the number of custom and self-build homes should be secured via the condition that requires development to be carried out in accordance with the identified plans. One of these plans will be the planning layout. The planning layout will set out, amongst other things, the number of custom and self-build homes.”</u></p> <p>Consequential changes have also been made to Appendix 4 Model s106 Obligations.</p>

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					<p>The following has been added as paragraph 15.11: <u>“Evidence that Custom and Self-build Plots have been Marketed Appropriately shall include:</u> - <u>Dated details of published marketing material,</u> - <u>Dated estate agent instructions,</u> - <u>Dated social media posts,</u> - <u>Dated correspondence with the Council in respect of marketing to those on the Council’s custom and self-build housing register,</u> - <u>Dated records of sales enquiries and outcomes of those,</u> <u>and</u> - <u>Dated changes in sales price.”</u></p>

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11. Neighbourhood planning / community led housing	Westerfield Parish Council (David Gooch)	10	The Draft Custom and Self-Build Housing Supplementary Planning Document (SPD) was considered at Westerfield Parish Council's meeting on 19th September, where the PC agreed to add their support for the SPD.	Support welcomed	No change
11. Neighbourhood planning / community led housing	Badger Building (E.Anglia)Ltd (Edward Gilder)	24	Neighbourhood plans are not viability tested and have led to some allocations being made which aren't deliverable. There are two allocations in the Kessingland Neighbourhood plan which fall into this category. Where developers are able to demonstrate that this is the case, it is no use the Council falling back on an undeliverable Neighbourhood Plan allocation. If you do, then the sites will remain undeveloped. In such circumstances you must be prepared to overrule the Neighbourhood Plan and find a compromise solution which brings development forward.	Neighbourhood Planning legislation sets out how neighbourhood plans must be made and the basic conditions they are tested against at examination. This is outside of the scope of this SPD.	No change
11. Neighbourhood planning / community led housing	Kettleburgh Parish Council (Sonia Frost)	52	Any exceptional housing should fit within the category.	Comment noted	No change
11. Neighbourhood planning / community led housing	Ingleton Wood LLP and DLP Planning Ltd for and on behalf of	67	Both the Beccles Neighbourhood Plan and Worlingham Neighbourhood Plan note that the strategy for Beccles and Worlingham is for the delivery of a total of 1,458 new dwellings over the period 2014 to 2036. In particular, this is to be delivered through the creation of the Beccles and Worlingham Garden Neighbourhood, which will deliver	Comment noted	No change

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Community led housing	Chenery's Farm Partnerships, Beccles Townlands Trust and Allison Homes		1,250 dwellings (1,055 dwellings during the plan period) along with a range of facilities, including a care home, employment development, primary school, community hub and open space. As such, neither of these plans provide for additional self-build or custom plots to be delivered in community led-house schemes.		
Appendix 1: Recommended Format of Planning Applications	Badger Building (E.Anglia)Ltd (Edward Gilder)	25	The section provides more useful and straight forward advice for applicants and you need to find a way of making sure that this is read prior to applications being made. It could be added to Council led seminars.	Support welcomed	No change
Appendix 2: Custom and Self-build Delivery Statement	Badger Building (E.Anglia)Ltd (Edward Gilder)	26	See previous comment.	Support welcomed	No change
Appendix 3: Model Conditions	Badger Building (E.Anglia)Ltd (Edward Gilder)	27	These conditions appear to cover some areas that you earlier said should be submitted with the application. Is their absence from an application not a validation issue, or are you prepared for this information to be submitted subsequently? There seems to be some contradiction here.	In order to avoid confusion and provide clarity the model conditions for the submission and approval of a design code and marketing strategy have been amended to note that the preferred approach is s106, but that conditions	The model condition relating to the submission and approval of a design code has been amended with the insertion of the following sentence

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				<p>may be used depending on the circumstances of each case.</p> <p>Paragraph 6.4 sets out that a phasing plan must be submitted with a planning application. This is potentially confusing and may be perceived to be inconsistent with paragraph 7.12 (now 7.14) and the model condition in Appendix 3, which set out the expectation that phasing plans be submitted prior to or in conjunction with the first reserved matters application. Paragraph 6.4 has therefore been amended to clarify that a phasing plan can be submitted prior to, or in conjunction with, the first reserved matters application.</p>	<p>before the model condition, at paragraph 14.12: <u>“The expectation will be for the submission and approval of a design code to be secured by a s106 agreement. However, there may be circumstances where a condition may be used instead.”</u></p> <p>The model condition relating to the submission and approval of a marketing strategy has been amended with the insertion of the following sentence before the model condition, at paragraph 14.14: <u>“The expectation will be for the</u></p>

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					<p><u>submission and approval of a marketing strategy to be secured by a s106 agreement. However, there may be circumstances where a condition may be used instead.</u></p> <p>Paragraph 6.4 has been amended as follows: "... A phasing plan must be submitted <u>prior to, or in conjunction with, the first reserved matters application with the planning application</u> setting out that each self-build plot is a separate phase that is capable of being delivered before or after any other self-build plots as well as any other parts</p>

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					<p>of the development (e.g. site wide infrastructure)..."</p> <p>Paragraph 7.12 (now 7.14) has been amended as follows: "... The phasing plan will be expected to be submitted prior to, <u>or in conjunction with,</u> the first reserved matters application."</p> <p>The model condition for the submission and approval of a phasing plan in Appendix 3 has been amended as follows: "Prior to, <u>or in conjunction with,</u> the submission of the first reserved matters application a detailed plan for</p>

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					the phasing of the development..."
Appendix 4: Model Section 106 Agreements	Badger Building (E.Anglia)Ltd (Edward Gilder)	28	As is the case with all applications, agreements need to be produced in a timely manner.	The purpose of preparing model section 106 obligations is to provide certainty and speed up the process.	No change
Appendix 5: Model Phasing Plan	Badger Building (E.Anglia)Ltd (Edward Gilder)	29	Helpful	Support welcomed	No change
Appendix 6: Model Plot Passport	Badger Building (E.Anglia)Ltd (Edward Gilder)	30	Helpful	Support welcomed	No change
Appendix 7: Case Studies	N/A	N/A	N/A	N/A	N/A
Appendix 8: Glossary	N/A	N/A	N/A	N/A	N/A

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