

Draft Affordable Housing Supplementary Planning Document

Public Participation Report

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Section 1 - General Information</i>				
<i>1.1</i>				
20741	Object	1) Support pre-application discussion 2) Para. 4.15 Welcome approach to 'encourage' rather than 'require' Lifetime Homes Standards. 3) Para. 4.16 Concerned about the Authority will be able to insist on provision of special needs properties. Suggest approach is too prescriptive and inflexible. Regard must be had to feasibility and viability. 4) With regard to clusters of no more than 6 and 15 dependent on size of settlement consider clusters of 20 properties even in smaller settlements are more efficient. 5) Section 5 should acknowledge shared equity housing can be delivered by a developer if registered as a Registered Provider.	1) Support for pre-application discussion noted. 2) Support for provision of SPD noted. 3) The Authority considers the special needs provision contained within the SPD to be appropriate. 4) It is considered that this provision of the SPD is appropriate. 5) Section 5 does not preclude this.	No change to SPD required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20758	Object	<p>On behalf of Pigeon Land, promoting land in both areas.</p> <p>(1) Section 1 Certain aspects of draft are in danger of creating new policies which is not the role of a SPD.</p> <p>(2) Section 3 It should be clear that if need can be identified, from Council's databases, then this should be sufficient to allow a scheme to progress.</p> <p>(3) Section 4 Concerned about several aspects: that HCA Design and Quality standards are an 'absolute requirement'; size of clusters; 'insist' on provision of special needs; phasing.</p> <p>(4) Section 5 Concerned about Council approval of RP's; Council having 100% nomination rights on the first lets/sales, particularly in relation to the Choice Based Letting Scheme; greater clarity is required in relation to perpetuity matters; Legal Agreements referred to in Appendices A,B,and C should only be guidance etc.</p> <p>(5) Section 6 Need certainty in relation to financial matters and that financial parameters are defined at the outset. With regard to Rural Exception Sites an element of private housing to bring schemes forward should be acknowledged. Also 'commuted sums' should be on a scheme by scheme basis.</p> <p>(6) Section 7 Councils to take responsibility for ensuring that all data required in identifying housing need is kept up to date.</p>	<p>(1) It is not considered that the draft creates new policies. Rather it adds value and elaborates upon existing policies and procedures already adopted in both Authority areas and this is the purpose of an SPD. It is accepted that the SPD does not have the same status as other Local Plan documents.</p> <p>(2) The SPD makes clear that the SHMA and housing register/database will be the key mechanisms for evidencing local needs.</p> <p>(3) It is considered that the provisions of the SPD as they relates to the points raised are appropriate. In terms of phasing and viability of delivery, there is some flexibility built in to the provisions of the SPD.</p> <p>(4) The Authorities 'recommend' that developers put forward proposals with a partner RP, approved by the Authority. It is accepted that this will not always be possible. The mechanism for allocating homes is considered appropriate as is the explanation of perpetuity matters as identified at para. 5.13 of the SPD. It is made clear at para. 5.34 that the legal agreements identified at appendix A and B are the 'preferred' method for securing provision and are intended merely as guidance.</p> <p>5) The NPPF does allow for modest amounts of private housing to 'enable' provision of affordable housing although this is at the Authorities discretion, would be considered on a case-by-case basis and would not be standard practice. Financial contributions in lieu will only be considered in exceptional circumstances, i.e. consideration will be afforded to it on a scheme-by-scheme basis.</p> <p>6) The Authorities intend to ensure that all data required in identifying housing need is kept up-to-date.</p>	No change to SPD required.
20754	Object	<p>Para. 5.31 Has the advantage of flexible interpretation. But ...it does not give enough help for organisations needing to recruit a young graduate to a specialist teaching post for example, unless housing is available. Rural areas do not have enough private housing for rent in the quantity that urban areas have and so suffer deprivation.</p>	<p>The Local Connection priority criteria as outlined at para. 3.1 are considered appropriate and it is considered beyond the scope of the SPD to make further provision as suggested.</p>	No change to SPD required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20713	Object	<p>Definition of affordable housing</p> <p>1) The Glossary of Terms in the SPD defines Affordable Housing as including '...social rented and intermediate housing, provided to specified eligible households...'</p> <p>This is not consistent with the definition provided in Annex 2 of the NPPF, as reprovided in bullet point one of paragraph 2.4 of the SPD, as it misses out affordable rented, i.e. it should read 'Social rented, affordable rented and intermediate housing, provided to eligible households...'</p> <p>This should be corrected in the next version of the document.</p> <p>2) Viability</p> <p>The sections on viability appraisal/assessments could usefully refer to paragraph 173 of the NPPF, which states that:</p> <p>'...To ensure viability, the costs of any requirements like to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'</p>	<p>1) Comment noted and SPD will be amended.</p> <p>2) Insertion of text as provided is not considered necessary.</p>	Amend definition of affordable housing provided in the glossary so that it is consistent with that provided at para. 2.4 and the NPPF.

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20746	Object	<p>On behalf of Sturmer Parish Council</p> <p>1) Para. 2.30/2.31 Percentage of affordable homes is too high, resulting in private housing being too expensive and squeezed together causing conflict with neighbours eg Haverhill.</p> <p>2) Para. 2.34 Since downturn Affordable Housing Economic Viability Assessment 2009 no longer accurate assessment. Housing targets in rural areas are far too high encouraging inward migration.</p> <p>3) Para. 3.8 Little evidence of rural housing need in relation to current levels of employment opportunity in rural areas.</p> <p>4) Para. 6.7 Appears to introduce a new charge to the developer. Unreasonable for developer to meet Council's legal charges.</p> <p>5) Page 34 Para. 3.1 Clause amounts to highway robbery by the Planning Department.</p>	<p>1) The percentage requirements were based on a robust assessment of local need at the time the Core Strategies for both Authorities were adopted. Both Authorities Core Strategies were thoroughly examined by an independent inspector and subsequently deemed to be sound.</p> <p>2) The Core Strategies of both Local Authorities will be re-examined in due course and reflect any changes in local need. In the meantime, both Authorities will continue to use more recent SHMA and local housing register data to justify provision on a site-by-site basis.</p> <p>3) Any affordable housing provision in rural areas will be considered in relation to a thorough assessment of local need and an assessment of the 'sustainability' of the proposal in the wider sense.</p> <p>4) It is considered appropriate that the developer would cover 'reasonable' costs as they relate to viability assessments.</p> <p>5) It is not considered that any clause/provision of the SPD constitutes 'highway robbery' by the planning department.</p>	No change to SPD required.
20742	Object	<p>1) NPPF allows for the provision of a portion of market housing to assist in meeting development costs for any affordable housing. There is no mention of this approach.</p> <p>2) Concerned about concentration of affordable housing in Bury St Edmunds town centre. This needs to be balanced against the need for the Borough as a whole.</p> <p>3) A financial contribution on the above 2 sites would provide flexibility for the Council to meet areas of key need within the Borough that could not be met within the market, whilst also taking into account key important issues such as urban design and planning principles.</p>	<p>1) It is at the Authorities discretion whether or not to consider allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. This would not be standard practice and would be assessed on a case-by-case basis.</p> <p>2) The provision of affordable housing is based on a robust needs assessment. Para. 4.18 of the SPD identifies that both Authorities will aim to ensure that affordable housing is not concentrated in clusters greater than 15 properties in settlements with populations greater than 3,000.</p> <p>3) In terms of off-site contributions in lieu of on-site provision, each case/application will be judged on its own merits although the Authorities are bound by the NPPF, (para. 50), provision that where affordable housing is needed to set policies for providing this on-site, 'unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified'.</p>	No change to SPD required.

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20747	Object	Do not want any further affordable houses in Lakenheath. We need more affordable shops and facilities, in particular a decent larger supermarket, so that residents can shop locally.	Comment noted. The NPPF requires us to use our evidence base to ensure our Local Plans meet the full, objectively assessed needs for market and affordable housing in our housing market areas.	No change to SPD required.
20743	Object	<p>Overview well written document</p> <ol style="list-style-type: none"> 1) Refers to NPPF opening the door for modest amounts of private housing enabling delivery of affordable housing. 2) Para. 4.12 Could be slightly tempered to allow RP and LA's to mutually agree alternative standards. 3) Para. 4.15 Support clause ' to encourage' 4) Para. 5.22 Suggest affordable rents should also have reference to them not exceeding the relevant LHA rate? 5) Para. 5.28 Define intermediate rent where it is used in the same way as previous HCA guidance at 80% of market rent exclusive of service charge. 6) Para. 5.35 Makes reference to now dispanded Tenant Services Authority 7) Very concerned about reference to Mortgagee in Possession clauses will not be allowed on Rural Exception Sites. See attachment for details. 8) Para. 6.4 Table appears to exclude development finance costs which are as intregal as the other items. 9) Para. 6.32 Reference to social rental value is incorrect and should be affordable rented value. 10) Para.6.34 Concerned that annual rent on unsold equity at 1.5% is low when most housing Associations are charging rents at 2.75% 11) Para.6.35 Suggests alternative to Commuted Sum Formula, see attachment for details. 12) Glossary of Terms. Suggest add definition for Registered Provider. 13) Add reference to emerging models of funding from equity investors for affordable housing. 	<ol style="list-style-type: none"> 1) The NPPF does allow for modest amounts of private housing to 'enable' provision of affordable housing although this is at the Authorities discretion, would be considered on a case-by-case basis and would not be standard practice. 2) It is considered that the provisons contained at para. 4.12 are appropriate and that a consistent approach to standards in construction is required for application accross the Authorities. 3) Support for terminology adopted within SPD noted. 4) At para. 5.23, reference should be made to the 'Strategic Tenancy Strategy' which explains how affordable rents should not exceeding the relevant LHA rate. 5) It is not considered neccessary to define intermediate rent as suggested. 6) The Tenant Services Authority has been dispanded and therefore reference to it will be deleted. 7) If is considered that the differentiation between 'mortgagee in possession' clauses as it relates to exception sites and 'other' affordable provision is appropriate. 8) 'Interest Charges' do appear on p.22 and this is intended to cover 'development finance costs'. 9) Para. 6.32 will be amended with the addition of reference to 'affordable rented value'. 10) Para.6.34 Annual rent on unsold equity at 1.5% is not correct and should read 2.75%. 11) The calculation provided is considered to be appropriate. 12) It would seem appropriate to add reference to RPs in the glossary section. 13) It is not considered neccessary to add reference to emerging models of funding from equity investors for affordable housing. These could be considered within the context of any review of the SPD at a later date. 	<ol style="list-style-type: none"> 4) Reference to be made within the document to the 'Strategic Tenancy Strategy'. 6) The Tenant Services Authority has been dispanded and as a consequence, reference to it will be deleted. 9) Add reference to 'affordable rented value' at para. 6.32. 10) Replace 1.5% with 2.75% at para. 6.34. 12) Add reference to RPs in the glossary section.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20709	Object	<p>1) Consider how the Affordable Housing SPD could be integrated more clearly with the Developer's Guide.</p> <p>2) Para. 2.6 Delivery of affordable housing is a priority in the East of England Plan.</p> <p>3) Para. 3.8 Does not take account of NPPF Annex 2-page 55 which clarifies the definition of rural exception sites to include small amounts of market housing. This section could also refer to the interactions between market housing, private rented accommodation and affordable housing in the rural context.</p> <p>4) Para. 4.10 Need to define what is meant by 'special needs'. the definition of 'older people' and 'people with disabilities' found in the NPPF should be used. Reference to forthcoming toolkit should be included.</p> <p>5) Para. 4.15 Support Lifetimes Homes.</p> <p>6) Para. 4.19 Distinguish between social/affordable rented and intermediate (shared ownership) housing in terms of clustering.</p> <p>7) Para. 5.1 Need to clarify if funds obtained by Registered providers are invested in a given town, village or rural area.</p> <p>8) Para. 5.23 Helpful if this para. were to specify that affordable rent is generally set at 80% of the median local market rent.</p> <p>9) Para. 6.2 & 6.4 Reference to Developers Guide should be made. Use term 'planning obligation' rather than 'planning gain'</p> <p>10) Para. 6.9 Reference to relevant regulations could be made to highlight statutory provisions exist restricting the right to buy or acquire in certain parishes etc.</p>	<p>1) Although a link to the SPD from the Developers Guide could potentially be of use, a number of the documents provisions are specific to St Edmundsbury and Forest Heath and not applicable Suffolk-wide.</p> <p>2) The East of England plan has been revoked and therefore reference to it within the SPD is not considered appropriate.</p> <p>3) The provision contained within the NPPF that small numbers of market homes may be allowed on rural exceptions sites to enable delivery of affordable units is entirely at the Authorities discretion. Such provision would need to be considered on a case-by-case basis and would not constitute standard practice. It is not considered necessary to make reference to the interactions between market housing, private rented accommodation and affordable housing in the rural context.</p> <p>4) Agreed that it would be useful to make reference to 'Special Needs' housing. Any pertinent issues arising from the emerging toolkit, once it is completed, can be incorporated into a future iteration of the SPD.</p> <p>5) Support for SPD provision noted.</p> <p>6) It is considered superfluous to distinguish between social/affordable rented and intermediate (shared ownership) housing in terms of clustering.</p> <p>7) Para. 5.1 - It would be useful to clarify where funds obtained by Registered providers upon sale are invested which is District/Borough-wide,</p> <p>8) It is not considered necessary that the term 'median' is inserted into this paragraph.</p> <p>9) It is not considered necessary to make the suggested amendments.</p> <p>10) It is not considered necessary to make reference to the regulations in this instance.</p>	<p>4) Specify what constitutes 'Special Needs', (for older people and people with disabilities), within the SPD glossary, (as it appears within the NPPF).</p> <p>7) Para. 5.1. Specify where funds obtained by RPs will be invested, (locally - Borough/District-wide).</p>

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20712	Object	<p>Berkeley is promoting land to the northeast of Bury St Edmunds</p> <p>1) Para. 2.20 Support site specific matters.</p> <p>2) Design Standards - reference to Rt Hon Don Foster MP's report on development standards Spring 2013 should be noted in SPD.</p> <p>3) 'Affordable housing provided should be of a similar size and quality to open market housing and shall be visually indistinguishable as far as practicable'. The SPD needs to be mindful of the different markets operating on affordable and market housing and how this will impact on the size/quality of market/affordable homes within specific developments.</p> <p>4) Para. 4.18-19 Support aim to integrate affordable housing with market housing. However reference at 4.16 about special needs housing is too late in the design process for it to be integrated, into a masterplan and a developments viability.</p> <p>5) Also delivery within a phased development needs to be carefully considered with regard to viability in relation to S106 requirements.</p> <p>6) Para. 6.12 Off site contributions should not be considered a 'last resort' when it helps deliver a scheme which would be unviable in a particular phase.</p> <p>7) Welcome support for viability assessment .</p> <p>8) For strategic schemes with long gestation and development periods the appraisal of viability should not be simply on a Gross Margin basis but also with reference to Internal Rate of Return, total cash exposure and the period for achieving a positive cash flow/payback.</p>	<p>1) Support for provisions of SPD noted.</p> <p>2) It is not considered necessary to make reference to the Rt Hon. Don Foster MP's report on development standards although any substantive changes to policy arising can be captured in a later iteration of the SPD.</p> <p>3) Comment noted. The SPD identifies that market/affordable housing should be visually indistinguishable 'as far as practicable'.</p> <p>4) Support noted. In terms of special needs housing requirements, it is considered that appropriate measures can be incorporated in a timely manner.</p> <p>5) The SPD identifies that 'wherever possible' affordable housing should be provided in tandem with the provision of the market housing and that ultimately this will be set out in a legal agreement and subject to consultation with the individual developer. The SPD also recognises that viability, (i.e. a slump in the market), may have an impact on delivery rates/phasing of affordable/market units.</p> <p>6) The Authority maintains that off-site contributions in lieu of on-site provision should be a last resort. This accords with the provision(s) of the NPPF at paragraph 50.</p> <p>7) Support for application of viability assessments noted.</p> <p>8) Provision of SPD considered appropriate.</p>	No change to SPD required.
20549	Object	<p>Lakenheath Parish Council wants to see a right to buy for LOCAL residents and local residents only.</p>	<p>Although 'right to buy' for local residents is not a provision of the SPD, at paragraph 5.30 it is explained that affordable housing will primarily be allocated to those in need with a 'local connection' to the Local Authority area. Further, in rural parishes on exception sites the affordable housing will be available in the first instance to people with a local connection to that Parish on the basis of the criteria as identified on p.19 of the draft SPD.</p>	No change to SPD required.

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20761	Support	<p>(1) Section 1 Certain aspects of draft are in danger of creating new policies which is not the role of a SPD.</p> <p>(2) Section 3 It should be clear that if need can be identified, from Council's databases, then this should be sufficient to allow a scheme to progress.</p> <p>(3) Section 4 Concerned about several aspects: that HCA Design and Quality standards are an 'absolute requirement'; size of clusters; 'insist' on provision of special needs; phasing.</p> <p>(4) Section 5 Concerned about Council approval of RP's; Council having 100% nomination rights on the first lets/sales, particularly in relation to the Choice Based Letting Scheme; greater clarity is required in relation to perpetuity matters; Legal Agreements referred to in Appendices A,B,and C should only be guidance etc.</p> <p>(5) Section 6 Need certainty in relation to financial matters and that financial parameters are defined at the outset. With regard to Rural Exception Sites an element of private housing to bring schemes forward should be acknowledged. Also 'commuted sums' should be on a scheme by scheme basis.</p> <p>(6) Section 7 Councils to take responsibility for ensuring that all data required in identifying housing need is kept up to date.</p>	<p>(1) It is not considered that the draft creates new policies. Rather it adds value and elaborates upon existing policies and procedures already adopted in both Authority areas and this is the purpose of an SPD. It is accepted that the SPD does not have the same status as other Local Plan documents.</p> <p>(2) The SPD makes clear that the SHMA and housing register/database will be the key mechanisms for evidencing local needs.</p> <p>(3) It is considered that the provisions of the SPD as they relates to the points raised are appropriate. In terms of phasing and viability of delivery, there is some flexibility built in to the provisions of the SPD.</p> <p>(4) The Authorities 'recommend' that developers put forward proposals with a partner RP, approved by the Authority. It is accepted that this will not always be possible. The mechanism for allocating homes is considered appropriate as is the explanation of perpetuity matters as identified at para. 5.13 of the SPD. It is made clear at para. 5.34 that the legal agreements identified at appendix A and B are the 'preferred' method for securing provision and are intended merely as guidance.</p> <p>5) The NPPF does allow for modest amounts of private housing to 'enable' provision of affordable housing although this is at the Authorities discretion, would be considered on a case-by-case basis and would not be standard practice. Financial contributions in lieu will only be considered in exceptional circumstances, i.e. consideration will be afforded to it on a scheme-by-scheme basis.</p> <p>6) The Authorities intend to ensure that all data required in identifying housing need is kept up-to-date.</p>	No change to SPD required
20711	Support	Natural England comment this is a low risk/priority and will not be offering any representations at this time.	Noted.	No changes to SPD required.
20762	Support	On behalf of Norfolk County Council. At this stage it is not considered that the document raises any strategic cross-boundary issues with Norfolk County Council.	Comment Noted.	No change to SPD required.

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20763	Support	Bardwell Parish Council 1) Section 3.8 Supports paras. 3.11 and 3.12 2) Section 4 Has experience of and concurs with 4 and 4.22. 3) Section 5 Has experience of and concurs with 5.29 - 5.34	1) Support noted, 2) Noted, 3) Noted.	No change to SPD required.
20744	Support	Requests his land at Mill Lane, Hopton is developed for affordable housing.	Noted. The respondents site can be considered for affordable housing/other development in accordance with other policies contained within the Development Plan of both Local Authorities.	No change to SPD required.
20708	Support	The Authority has no comments on the draft SPD	Noted.	No changes to draft SPD required.
20760	Support	1) On behalf of the Bury Branch of the Labour Party support the aims of the SPD as there is a severe shortage of affordable homes both nationally and in Bury St Edmunds. 2) Will keep close eye on document to ensure targets are met. Concerned that developers often 'bribe' their way out of fulfilling numbers of affordable homes by promising more S106 money for local project. It is essential that we provide more affordable homes to support our growing and ageing communities. 3) What mechanisms will be used to ensure targets are met.	1) It is accepted that there is a shortage of affordable housing and this is what the SPD and other policy contained within the Development Plan of both Authorities is attempting to address. 2) The preferred option, as specified, is on-site provision of affordable housing of the required amount and type. Only in exceptional circumstances will off-site contributions in lieu of provision be considered. 3) Mechanisms for monitoring the supply of affordable housing units are identified at section 7 of the SPD.	No changes to SPD required.
20495	Support	Thank you for consulting Braintree District Council on your Affordable Housing SPD. The Council has no comments to make.	Noted. No changes required.	No Action required

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Section 2 - Planning Policy Context				
<i>2.33</i>				
20638	Support	Would need to ensure that the rural exception site is held in perpetuity.	Paragraph 3.12 of the SPD identifies that any exception site granted planning permission will remain affordable in perpetuity. This is in accordance with other local and national planning policy.	No change to SPD required.
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<i>2.34</i>				
20639	Support	Support the proportion of affordable housing in new developments as being 30% in new developments of 10 units or more	Support for provision as contained within SPD.	No change to SPD required.
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Representations**Nature Summary of Main Issue****Council's Assessment****Action****Section 3 - The Need for Affordable Housing****3.6**

20531	Support	I confess to not having read the SHMA. Nevertheless, I am concerned that the data included in the Housing Register may be affected by both national and local politics. While the need for affordable housing for the indigenous population may be determined with a good degree of accuracy, that for migrants could be changed by factors such as the UK's relationship with Europe, agricultural policy, defence policy and other related matters.	Affordable housing needs will be established via the housing registers and SHMA. There are standardised practices in place for gathering the data in such a manner and there is nothing to suggest that the 'results' or evidence presented will be 'influenced' as a consequence of either national or local policy.	No change to SPD.
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3.9

20637	Support	Would support the provision of access to affordable accommodation for local people on modest incomes which would enable them to stay within local communities but concern is raised at the current level at which affordable rent is being set.	The concerns are noted. Affordable rent is subject to rent controls, (the setting of which are beyond the scope of the Authorities), that require a rent of no more than 80% of the local market rent, (para. 2.4 of the SPD). The local connection criteria/provisions of the SPD should ensure that homes are available for local people thus allowing them to stay with their own communities.	No change to SPD required.
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3.10

20535	Support	Suffolk ACRE fully supports allowing rural parish local needs schemes on Exception sites as way of providing much needed affordable housing for local people with a connection to the parish and in making the parishes to continue to be sustainable.	Support for provision as identified within the SPD.	No change required.
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3.11

20536	Support	Parish Local Housing Needs surveys help to highlight the real need from households with a connection to a parish. Many of these needs may be termed hidden need as they may previously not registered on the Choice based Letting register as feel their current need would not be given a high banding, this may apply particularly to older children still living at home in their 20s and 30s	Para. 3.11 identifies that Housing Needs Surveys undertaken by Parish Councils will be a material consideration when considering planning applications for exception sites. Further, para. 4.9 describes how affordable housing provision in rural areas will need to be tailored to the results of these surveys where they exist.	No change to SPD required.
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3.12 20537	Support	Suffolk ACRE fully supports this policy as it is imperative that all exception sites will remain affordable in perpetuity for the continued need of the rural parishes, and that the houses can never be sold off or converted to private rent	Support for proposal as identified within SPD.	No change to SPD required.

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Section 4 - Delivery of Affordable Housing				
4.9				
20538	Support	Suffolk ACRE fully supports this policy in particular for rural parish schemes where the recommendations from Parish Local needs survey must be taken into account for the mix of properties.	Support for proposals as identified within the draft SPD.	No change required.
4.11				
20573	Object	<p>Government policy aims to widen the opportunity for home ownership and to enable people to own their own home. Delivering that aspiration should be the key in providing for affordable homes.</p> <p>The proposed split between rented and intermediate tenures is likely to raise significant viability issues given that both Councils expect affordable housing to be provided without any public subsidy (para 5.8). A more flexible approach is needed to the split between rented accommodation and intermediate accommodation to ensure viability and to enable peoples' aspirations for home ownership to be met.</p>	The approach taken in the SPD is considered appropriate. The split between rented and intermediate tenures will be considered on a site-by-site basis.	No change to SPD required.
4.13				
20574	Object	<p>1) The SPD can not set an "absolute requirement" that new affordable homes comply with the HCA's Design and Quality Standards. Adherence to such standards pushing the costs of affordable homes up and hence the rent. Such standards can only be insisted upon where and element of public subsidy is involved.</p> <p>2) No evidence that an assessment of the cumulative impact of policies on the viability of development (as required by para 174 of the NPPF) has been carried out.</p>	<p>1) It is at the Authorities discretion to set such an 'absolute requirement'.</p> <p>2) It is not considered that the implementation of the provisions of the Affordable Housing SPD, even in combination with other standards and policies contained within the development plans of both Authorities, will put the implementation/delivery of these plans at risk.</p>	No change to SPD required.
20539	Support	Suffolk ACRE fully supports the policy that Developers which bring forward affordable units will be expected to adhere to the HCA Design and Quality standards.	Support for proposals as contained within the draft SPD.	No change to draft SPD required.

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4.15				
20540	Object	All affordable dwellings should achieve Lifetime Homes	Both Authorities will encourage all affordable homes to achieve Lifetime Homes Standard.	No change to SPD required.
20575	Object	The Council's have removed from the Development Management Policies Document the requirement for Lifetimes Homes standards to be met. It can not be re-introduced through this SPD as that would be contrary to the NPPF which requires that any standards to be applied be set out in the development plan so they can be tested for their impact on the viability of development.	The Council's will 'encourage' lifetime homes standards to me met, (para. 4.15 of the SPD).	No change to SPD required.
20541	Support	Suffolk ACRE fully supports that all affordable homes must achieve Lifetime homes	Both Authorities will encourage all affordable homes to achieve Lifetime Homes Standard.	No change to SPD required.
4.18				
20576	Object	Integrating affordable housing within developments needs to take into account the management needs of providers rather than being a blanket approach of no more than 15 properties in any one location.	The 'aim' of the SPD is considered appropriate in the interests of social inclusion and to reduce segregation. However, all applications will be considered on a site specific basis.	No change to SPD required.
4.23				
20542	Support	Suffolk ACRE fully supports exception sites, but would like added and in line with the new NPPF which states in certain cases to make an rural exception scheme viable a small number of open market properties may be allowed if they can be proved to be needed for the cross subsidy. for example Chelmsford, East Cambs now include this, extract form the draft Bath "A small proportion of market housing will be appropriate only where it can be demonstrated that the market housing is essential to cross-subsidise the affordable housing and that the site would not be viable without this cross-subsidy."	The NPPF does allow for modest amounts of private housing to 'enable' provision of affordable housing although this is at the Authorities discretion, would be considered on a case-by-case basis and would not be standard practice.	No change to SPD required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Section 5 - Managing the Provision of Affordable Housing</i>				
<i>5.8</i>				
20577	Object	It is a matter for agreement between the developer and registered provider whether the developer builds the accommodation or not.	Comment noted and not disputed.	No change to SPD required.
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<i>5.30</i>				
20543	Support	Suffolk ACRE supports the local connection criteria.	Support for provision contained within draft SPD.	No change to SPD required.
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<i>5.32</i>				
20544	Support	Suffolk acre supports the cascade mechanism with named neighbouring parishes	Support for proposal as contained within the draft SPD.	No change to SPD required.
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Representations**Nature Summary of Main Issue****Council's Assessment****Action****Section 6 - Financing Affordable Homes****6.4**

20578	Object	Site Acquisition Costs: Due to reasons of confidentiality it may not be possible (or, as far as CP is concerned, not preferable) for the actual purchase price to be disclosed. At the time of the S106 negotiations the land may, in fact, not have been purchased.	As explained at para. 6.4, the Authority will work with developers to explore the issue of viability on a site-by-site basis. We would expect the developer to have an indication of what they are proposing to pay for the site even if it has not been purchased at the time S106 negotiations commence.	No change to SPD required.
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6.6

20579	Object	1) More thought needs to be given to the practicalities of a review every 3 years - is this a review of the estimated costs/incomes for the balance of the scheme or also including a full review of actual costs/incomes to date (ie fully audited accounts)? 2) Also, should in later phases sufficient surplus be realised to 'catch up' on affordable housing provision that has been underprovided in earlier phases, this could potentially result in an affordable housing percentage of significantly more than policy to such a degree that it may detrimentally affect the sales values of the private units.	1) It is considered that the review mechanism described is appropriate and will be based on a full viability assessment as undertaken at the time of the original application. 2) The SPD is clear insofar as no more than the original policy target/requirement needs to be reached by the developer over the entire scheme.	No change to SPD required.
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6.10

20545	Support	Suffolk ACRE fully supports this policy to maintain the properties in perpetuity and not allowing shared ownership properties to be sold on the open market	Support for proposal as identified within draft SPD.	No change to SPD required.
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