

Supplementary Planning Document for Affordable Housing

APPENDIX A

Responses

Respondent	Response	Council's Assessment	Action
Environment Agency	Paragraph 4.4 of the SPD sets out that all planning proposals should comply with Government guidance and adopted Local Plans for West-Suffolk. Accordingly, we have no concerns and do not wish to make any further comment at this time.	Response gratefully received	No change required
Community Action Suffolk	<p>Rural exception sites</p> <p>4.52 Maybe delete Parish Plan and insert Neighbourhood Plan and evidence through Housing Needs Surveys</p> <p>4.55 & Housing Needs Surveys</p> <p>4.56 & housing Needs Survey identifies a need for market housing</p>	No substantial change. Comments acknowledged and amendments made.	Change required
Natural England	<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>	Response gratefully received	No change required

Trevor Taylor	Would like to put forward a piece of land as part of the SHLAA.	Acknowledged and has been put forward to Planning Policy as part of the Local Plan examination.	No change required
Combined response submitted on behalf of Ousden, Lidgate, Risby, Stradishall and Stansfield parish councils.	<p>The changes in the Affordable Housing SPD are excellent; however, we would like to make the following comments:</p> <p>Rural Exception Sites 1. Evidence of need.</p> <p>There is a huge lack of understanding and confusion about what affordable housing actually means and this needs to be addressed. Rural communities may be concerned that affordable housing could lead to a huge influx of people with no connection to the village. Providing clear information about what is meant by affordable housing and how it is managed is crucial to gain the support of rural communities.</p> <p>One concern is that the current method of assessing housing need which relies on surveys and the HomeLink register is not robust enough and disadvantages rural communities as they do not provide a realistic reflection of actual need. People believe that the housing list only includes people who have registered with Home Link for social housing to rent. The challenge is to get information out to people to make them aware that the HomeLink system of registration is for other forms of affordable housing, particularly as this is not made particularly clear on the HomeLink website which states:</p>	<p>Response gratefully received</p> <p>An Affordable Housing Guide has been produced to provide a better understanding of the terminology used around affordable housing. This has been emailed to all parish and town councils' in West Suffolk</p> <p>Acknowledged.</p> <p>Affordable Housing Guide provides clearer information on the allocation of housing and HomeLink. This is not considered part of the Affordable Housing SPD.</p>	No change required

	<p><i>Other types of properties such as extra care and Equity Share properties may also be advertised here.</i></p> <p>A lot of people do not bother to respond to surveys and some people can be intimidated by the wording or amount of detail required. Older people might find them complicated as would people with poor literacy skills.</p> <p>Asking people to register because they need other affordable housing seems unrealistic and doesn't include people with slightly higher/middle incomes who would like to live in villages but can't afford to or people who have a local connection but do not consider themselves in need and so do not register.</p> <p>The same applies to older people, or anyone who currently has a home so would not feel the need to register but may like to move to a place where they have a local connection, or which is better suited to their needs. There may also be people who have moved away who would not be reached by a local survey. The system is geared up for people who are in housing need but doesn't help people who wish to remain in or move into a rural area but can't afford to.</p> <p>The evidence base is provided by West Suffolk Council and there is limited input from local communities who are ultimately the best people to provide information about need. Residents will often talk to local councillors about their housing needs or concerns and this helps build up a picture of local need. It would be better if information about need could be provided by local communities in conjunction with</p>	<p>Community Action Suffolk to contact parish councils about local housing need and how we can work more closely with Parish Councils. This is noted and will make Community Action Suffolk aware of the parishes concerns.</p>	
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	<p>West Suffolk Council as there is greater trust and contact between parish councils and the communities they serve, and villages would like to have more say. They are also able to pass on information more effectively through local newsletter, parish websites and forums. Community led schemes would also win more favour in rural areas.</p> <p>1. Self-build There is no provision for self-build in rural areas. Could they incorporate something similar to the scheme described in this link?</p> <p>https://www.gravenhill.co.uk/</p> <p>We have already had queries from residents who would like to give land to one of their children who otherwise would not be able to afford a home for a self-build, but this is not allowed under current planning policy. In rural areas, this may be one of the most effective ways of enabling small scale affordable development. As soon as developers get involved in the planning process, costs increase because they are trying to make a profit. Self-build would remove the need for a developer to get involved and would help to keep costs down.</p> <p>In rural communities, there may be small plots of land or large gardens which could be used to enable self-build.</p> <p>2. Types of properties available There is often a need for smaller properties in rural areas for young people, people who live on their own, people who</p>	<p>Acknowledged and put forward for consideration as part of the Local Plan examination.</p> <p>Acknowledged.</p>	
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	<p>need to downsize. Developers want to build more profitable large properties. Could the affordable housing policy be adapted to allow affordable properties to be built which meet very specific criteria with regard to number of bedrooms and design?</p> <p>Another problem in rural communities is that smaller houses are often extended. This in itself is not an issue, but it does increase their value, thus depleting the affordable housing stock for that type of property. Could there be a legal undertaking not to extend properties if initially purchased under any "affordable" scheme to prevent them from being affordable in the future?</p> <p>Middle-income earners are often priced out by an uneven mix of properties, (again often exacerbated by current owners building extensions depleting housing stock in that particular price range).</p> <p>3. Design of properties</p> <p>Properties need to be fit for purpose, for example an elderly person who wishes to downsize may need a single storey property which will suit their needs as they get older. This needs to be reflected in the policy to enable more suitable housing to be built. The policy of extra care homes is excellent, but it would be good to see them provided in rural communities as well so that older people who need to downsize or need extra care can stay in the community, they have lived in all their lives.</p> <p>In some parts of France if you live in a rural community you</p>	<p>Comment passed to Planning Policy for consideration as part of the Local Plan examination.</p> <p>Comment passed to Planning Policy for consideration as part of the Local Plan examination.</p>	
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	<p>earn the right to move into purpose-built accommodation within your community as you get older. This means that people know that they will be looked after well into old age and removes any anxiety about what will happen to them. Could this be a possible model for UK, whereby there is a range of housing in a village which people can move into as their needs change?</p>		
<p>Martin Aust on behalf of my client Pigeon Investment Management Limited (Pigeon).</p>	<p>General comment: The purpose of the SPD should be to facilitate the delivery of affordable housing, rather than introduce additional controls that in practice may hinder the delivery of new homes. We have therefore sought within the comments below to highlight where the draft SPD has the potential to frustrate the delivery process and, where appropriate, have constructively suggested alternative wording or proposals that will facilitate affordable housing delivery.</p> <p>3.3/3.5. Comment: The type and tenure of affordable housing to be provided must also have regard to the impact on scheme delivery, and the aspirations of Registered Providers who it is hoped will invest in acquiring the homes. We believe the full range of affordable housing tenures should be readily available, as defined in the NPPF, and see no justification for restricting this. In this regard we welcome the list of definitions at 3.11 and comment at paragraph 3.13. We strongly believe the final tenure and scheme mix of the affordable housing is best left to the Reserved Matters stage, to best reflect emerging and changing housing need. Measures that seek to agree the affordable housing tenure ahead of this stage run the risk of hindering affordable</p>	<p>The SPD defines the council position on affordable housing. This includes the overall affordable housing percentage as well as the tenure requirement as per the latest economic assessment.</p>	<p>Minor change required. No material change to SPD content.</p>

	<p>housing delivery, counter to the purpose of the SPD, which is to facilitate affordable housing delivery.</p> <p>Only if the SHMA has fully explored all other tenures and their financial implications, and concludes they should be discounted, can this paragraph (3.5) be justified. The Council’s approach to affordable housing tenures should be clear and robust. As currently worded, the SPD has the potential to hinder, rather than facilitate affordable housing delivery. By allowing the full range of affordable housing tenures as defined by the NPPF then this will help to facilitate affordable housing delivery. Furthermore, the NPPF (published in Feb 2019) is more up to date than the SHMA and should therefore take precedence in respect of the full range of affordable housing products.</p> <p>3.7/3.9. Comment: West Suffolk’s objective to secure affordable housing on major developments of 10 or more homes, or sites of 0.5 hectares or more needs to be explicit within the SPD. This is in accordance with the NPPF. It should be clear that it supersedes the policy within the current local plan.</p> <p>3.11. Comment (see footnote): The Council note the robust evidence they have to support the need for Shared Ownership. There is no reference to where this evidence can be seen or if at the time other intermediate tenures referred to in the NPPF were explored, or indeed the impact on overall scheme delivery of alternative tenures. Comment here appears at odds with 3.13.</p>	<p>Acknowledged and will form part of the evidence base for the Local Plan examination. Our current policy requirements are highlighted within the SPD and still relevant to the delivery of housing across West Suffolk.</p> <p>Acknowledged and changes made.</p> <p>The SPD under paragraph 3.13 states that it will have regard to the affordable housing products defined within the NPPF Annex 2. The evidence used will identify the tenure type needed to meet the needs of those on local incomes and reflect local house</p>	
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	<p>3.14. Comment: We welcome reference to entry level exception sites. No further comment is made in the draft SPD other than quoting the NPPF. We support this policy which will enable increases in home ownership and the delivery of affordable housing. We believe the Council should more explicitly encourage the delivery of such schemes within the SPD.</p> <p>3.15/3.16. Comment: We welcome the site by site evidence-based approach to agreeing tenure mix. The tenure split detailed in table 1 is out of date and not supported by up to date evidence. It would be helpful in our experience for there to be a commitment to timely negotiations that don't delay schemes coming forward. As noted earlier we believe the tenure of affordable housing is best left to the reserved matters stage and needs to allow for the delivery of the full range of affordable housing tenures noted in the NPPF, in order to facilitate affordable housing delivery.</p> <p>We are concerned at the footnote to the table. This notes the Council has taken a decision that on small sites generating 2 or 3 affordable homes they should be for rent. This contradicts both adopted council policy and the NPPF requirement for 10% of homes to be affordable home ownership and so cannot be correct.</p> <p>Table 1 notes that up to 80% of affordable housing to be for affordable rent and only 20% for intermediate tenures. This</p>	<p>prices.</p> <p>The council will consider each scheme in line with current policies.</p> <p>Comment acknowledged and will form part of the evidence base for the Local Plan examination. Our currently policy requirements within the SPD are still relevant.</p> <p>Acknowledged and amended to include 10% affordable home ownership provision in accordance with NPPF.</p>	
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	<p>leads to a very low proportion of intermediate housing in comparison to the norm. This tenure mix is not consistent with the NPPF in encouraging the delivery of the full range of affordable housing tenures and is not supported by evidence.</p> <p>3.22. Comment: The requirement to involve a RP in the delivery of affordable housing should not be explicit. For example, RP involvement would not be required for Build to Rent or Discounted Market Sale schemes as defined in the NPPF, or indeed the involvement of other such bodies should be able to be agreed with the Council (for example Community Land Trusts etc.)</p> <p>We would also recommend caution about the necessity to engage with specific Registered Providers (RP's) at the outline stage. In our experience their investment strategies may well change before individual phases of larger strategic projects commence, RP's are also more likely to engage when there is certainty surrounding a scheme. In addition, there also needs to be flexibility with the housing mix and location allowing for circumstances to evolve between the pre-application stage and delivery, particularly problematic on larger strategic schemes and schemes that are submitted as outline applications.</p> <p>The Council is seeking to add to the definition of Affordable Rents by including reference to Local Housing Allowance rates. We do not support this, as RP's could find future rent levels inappropriately controlled, (through future welfare reform etc which may not be designed to control affordable housing in itself). This places undue risk on associations</p>	<p>Amended.</p> <p>We encourage early engagement with Registered Providers to assess the deliverability of the site. This is encouraged throughout the planning process.</p> <p>The need to include Affordable Rents not exceeding the Local Housing Allowance has been agreed by Members and was consulted as part of West Suffolk Housing Strategy and Tenancy</p>	
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	<p>which can only be mitigated by them offering lower prices than the market would dictate, again harming scheme delivery. Broad Rental Market Areas cover large geographical areas and are often too imprecise and can lead to large anomalies in comparison to the definition of Affordable Rents relating to the Market Rent. (There may be an argument for Local Housing Allowance rates to be referred to at the point of initial letting (following construction only).</p> <p>3.24. Comment: This paragraph notes affordable housing should be available in perpetuity. Requirements for affordable housing to be available in perpetuity must be subject to an appropriately worded Mortgagee in Possession (MiP) clauses acceptable to the RP's main funders. Failure to incorporate this will lead to affordable housing provision stalling as RP's will find homes not to be fundable. We would suggest that model clauses are agreed with Registered Providers to avoid often lengthy delays while Deeds of Variation are agreed and implemented, as by default has been the practice elsewhere where this issue isn't addressed at the policy level.</p> <p>There also needs to be acceptance of the implications of the Right to Acquire, if exercised by a tenant of a home being available in perpetuity.</p> <p>The monitoring and enforceability of subsidy recycling, to deliver alternative affordable housing provision within the district, has in practice proven very difficult to monitor and enforce in other districts. RP's have often resisted such</p>	<p>Strategy.</p> <p>The Mortgagee in Possession (MIP) Clause used in S106 follows the recommended wording issued by the National Housing Federation.</p>	
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	<p>clauses as they are often seen as being overly restrictive and often not practical if relatively small levels of receipt are received (for instance from when individual stair casing of shared ownership homes occurs). This has often been dealt with elsewhere by close strategic relationships between Councils and the main RP's operating in their areas.</p> <p>Homes England uses the Nationally Described Space Standards (NDSS) for benchmarking purposes rather than as a design standard. These floor areas are in excess of most RP's standards and the majority of affordable housing delivered in the last 30 years under former Homes England predecessors design advice, including the 'Code for Sustainable Homes'. However, their adoption can mask the need for good design and therefore layouts that maximise useable space. It should be acknowledged in the SPD that many RP's do not look for their housing to be constructed to the NDSS in order to meet the key objective of delivery of affordable housing. These standards could inadvertently lead to the delivery of fewer affordable homes, when it is a priority to deliver such homes to meet housing need. We are concerned that there may therefore be unintended consequences by the adoption of policies that have not been thoroughly tested on scheme delivery.</p> <p>4.1. Comment: This paragraph is poorly worded. We assume the intent is to be clear that public subsidy will not be available in normal circumstances (e.g. unless policy levels of affordable housing are exceeded) on schemes where affordable housing is delivered via S106 agreements, as opposed to affordable housing led schemes and schemes</p>	<p>Point 3.24 advises it is the council's preference that properties are built to MHCLG " Nationally Described Space Standard". This is not explicit but will be reviewed as part of the Local Plan examination.</p> <p>Acknowledged and amended.</p>	
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	<p>that exceed policy requirements. The suggested early engagement by developers is probably problematic and should at the Reserved Matters stage.</p> <p>4.2. Comment: This paragraph appears to contradict 3.22. We support comment at 4.2.</p> <p>4.7/4.9. Comment: The proposed arrangements for information being made available at full, outline and reserved matters applications are to be welcomed. However, provision of this information requires full engagement and cooperation from the authorities housing officers.</p> <p>4.10/4.13. Comment: We consider that the requirement for clusters of affordable homes to be limited to 6 homes in smaller settlements and 15 in larger ones is overly prescriptive. A limit of circa 25 homes seems sensible and should suffice on its own. Furthermore, there must be flexibility in how the policy is applied. The policy should allow for clusters to be located adjacent to one another where separate accesses arrangements are provided, in order to be practical. It should also be acknowledged that if the design approach for a scheme includes apartments then it is not necessarily practical to artificially split an apartment building to achieve cluster sizes of no more than 15. Again, flexibility should be allowed to achieve the key objectives of facilitating affordable housing delivery.</p> <p>4.14/4.15. Comment: Encouragement to avoid the design of schemes with high maintenance or high service charge requirements, is acceptable, although it should be noted</p>	<p>Remove paragraph 4.2</p> <p>Parcels no greater than 15 affordable dwellings have been supported by the Cambridgeshire Sub Region. This is to ensure we meet the Governments agenda of delivering a balanced and sustainable community.</p>	
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	<p>these costs will be reflected in RP's offer prices.</p> <p>4.16. Comment: Tenure blind development is to be encouraged as proposed by the draft SPD. However, the preference for NDSS for affordable housing could have the unintended consequence of hindering this.</p> <p>4.17/4.18. Comment: We note the Councils stated preference for homes to comply with the NDDS. See comment at 3.24 above. In addition, this proposal has not been tested as part of any West Suffolk Plan Viability Study to ascertain the effect on scheme delivery. The introduction of the SPD at this stage appears out of sequence with the Local Plan process, as this work has not yet been carried out. We are concerned that there may therefore be unintended consequences by the adoption of policies that have not been thoroughly.</p> <p>4.21. Comment: The draft SPD notes that all of the affordable homes should be constructed to Lifetime Homes. Such homes come at an additional construction cost of between £5/10,000. This proposal has not been tested as part of any West Suffolk Plan Viability Study to ascertain the effect on affordable housing delivery. Furthermore, we are concerned that such homes could still require immediate adaptation to meet individual tenant's needs in many circumstances. The SPD should therefore require the Council to identify particular needs of wheelchair users, rather than apply a blanket approach.</p> <p>4.22/4.23. Comment: Proposed arrangements for phasing</p>	<p>The SPD refers to the council's preferences on NDSS as per the Technical Advice Note but notes that this is not yet policy. Space standards will be considered further as part of the Local Plan examination.</p> <p>Acknowledged and will form part of the evidence base for the Local Plan examination.</p>	
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	<p>leading to affordable housing delivery proportionately with market housing are sensible. The early delivery of affordable housing can have significantly negative impacts on scheme delivery.</p> <p>4.24/4.28. Comment: We agree that in general on-site provision of affordable housing should be the preference. In our experience, almost without exception RP's will only take ownership of flats in blocks where the homes are all affordable housing in a block and the freehold can be transferred. Encouragement to consider such issues at the design stage may be considered wise, but specific acknowledgment of this example would be wise in our view</p> <p>Off-site provision includes examples of the transfer of free land in the draft SPD. This should be limited to accommodate the same number of homes and be by agreement. However, we are very concerned that table 2 notes that the Council may be willing to accept commuted sums only if all other options have been discounted. We believe this is far too prescriptive.</p> <p>4.29/4.30. Comment: We note the principal that commuted sums should neither be to the advantage or disadvantage of the developer. We note that such a payment relates to the difference in value between open market sale and restricted sale as affordable housing. The tenure of that affordable housing is of course critical to the calculation and should be referred to and in line with adopted policy. Open market values should be nett of the costs of sale and other incurred costs.</p>	<p>The Council preference is to secure onsite provision.</p> <p>Acknowledged and includes such provision within the SPD.</p>	
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	<p>4.31/4.39. Comment: These paragraphs outline the process for negotiating a reasonable commuted sum and in general are sensible. We see the principal danger as being the time this may take and the need for an arbitration clause to be included. Other authorities publish tables of commuted sums for the off-site provision of affordable housing and annual review mechanisms that give all parties certainty and should be included.</p> <p>4.51. Comment: The proposed limits to the number of homes to be provided on rural exception sites is viewed as being overly prescriptive. The introduction of entry level exception sites also brings into question the need for different controls from those at 3.14 above.</p> <p>4.56. Comment: The draft SPD on Rural Exception Sites paragraph appears to be at odds with the NPPF. The draft SPD notes “a small number of market housing” may be considered. Whereas the NPPF states that: 77... Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this. (Our emphasis)</p> <p>Paragraph 4.56 of the SPD should be amended to reflect paragraph 77 of the NPPF.</p> <p>5.1/5.3. Comment: We welcome comments in these sections relating to viability testing. However, we are</p>	<p>The Council considers that the use of tables for commuted sum figures can quickly be outdated. Therefore, we use a benchmark of three Registered Provider values to ensure current, robust values are agreed.</p> <p>Acknowledged. To be reviewed in line with the Local Plan examination.</p> <p>Amended.</p> <p>Viability testing as referenced should fully accord with the</p>	
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	<p>concerned that the full impact of policies contained in the draft SPD have not been tested as part of any West Suffolk Plan Viability Study to ascertain their impact on affordable housing viability.</p> <p>6.1/6.2. Comment: With regards to ongoing management we note the Council’s preference for sale to RP’s as a general principal. But this should not be required in all circumstances, for example where development occurs through ‘Build to Rent’, Discounted Market Sale, or where other approved bodies are involved.</p> <p>We assume Equity Share refers to Shared Equity and welcome the ability for developers to use this mechanism as included in the NPPF definitions of affordable housing. This seems contrary to 3.11 and the stated preference for Shared Ownership which we feel is inappropriate.</p> <p>6.4. Comment: See comment at 3.22 above</p> <p>6.11/6.13. Comment: With reference to comments on perpetuity reference must be made to appropriately worded MIP clauses – see 3.24 above (and provisions that do not hamper the Right to Acquire).</p> <p>Appendix 3. Comment: In the calculation of commuted sums open market values must be net of sales costs (legal, sales and marketing) and other incurred costs which are considerable in comparison to affordable housing.</p> <p>We suggest the Council by way of introducing an additional</p>	<p>NPPF.</p> <p>Amended</p> <p>Acknowledged and include full costs.</p>	
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	<p>appendix keep a delivery register of affordable housing which is updated quarterly.</p>	<p>Affordable Housing figures are reported annually as part of the Annual Monitoring Review.</p>	
<p>Bidwell's on behalf of Jockey Club Estates</p>	<p>Our comments are set out below, numbered as per the numbering within the SPD:</p> <p>3.11 - We support the definitions proposed for 'affordable housing for rent', 'affordable routes to home ownership', 'discounted market sales housing' and 'starter homes' as they replicate the definitions set out in the 2019 revised NPPF and they support build to rent (BTR) schemes</p> <p>3.22 - We suggest adding a comment here to clarify that the Landlord for affordable units of a BTR scheme is not required to be a registered provider as per Part A of Annex 2 of the revised NPPF</p> <p>3.24 - Regarding nominations agreements being entered into with the Council, we would suggest adding a comment to indicate that the Landlord of a BTR scheme may choose the occupiers of the affordable units, meeting affordability criteria. We agree that the affordable housing should be tied to stay as affordable housing for future eligible households</p> <p>4.2 - We support this clause which allows alternative arrangements for developing affordable housing; this will encourage and facilitate the delivery of affordable units in the district.</p>	<p>Amended</p> <p><i>To be considered internally.</i></p> <p>To be addressed as part of the Local Plan examination.</p>	<p>Minor change required: No substantial changes to document.</p>

	<p>4.5 - We are supportive of this clause but would suggest that it is expanded to clarify that one of the planning objectives which should be taken into consideration is the provision of affordable housing for a particular local need for specific social/employment sector such as the horse racing industry. This would support the other horse racing specific policies and will support the racing industry itself which is vital to the economic and social health of Newmarket and its surroundings.</p> <p>4.45 - We support this clause as it states that the Council will be reasonable in applying its policies on affordable housing</p> <p>6.1 - We would propose commenting to confirm that BTR schemes can be managed by non-RP Landlords as per the earlier sections of the document.</p> <p>6.6 - After the last bullet point, we would propose adding 'or evidence-based need' to enable the Council to support housing which is needed for specific local social/employment sectors.</p> <p>Glossary - We would propose that it would be helpful for the Glossary in this document to match the NPPF Glossary to ensure equitable considerations.</p>	<p>Amended.</p> <p>To be considered as part of the Local Plan examination.</p> <p>Amended.</p>	
Clinical Commissionin	The CCG would like it noted that developments with a large percentage of affordable housing will still create the same	Acknowledged.	No change

g Group	demand as those developments with less affordable housing. The CCG would like reassurance that the amount of developer contributions that can be requested for the provision of primary care in the vicinity of the development will not be reduced? Providing that the amount of S106 that can be requested will not be reduced then the CCG does not have a problem with agreeing to the new terms in the Affordable Housing Supplementary Planning Document 2019.		required
Planning Issues Ltd on behalf of the Retirement Housing Consortium	<p>Policy Context – Section 1 The Draft SPD is introduced as an update to the 2013 guidance. The SPD does not support new policy as the joint Local Plan has not reached an advanced stage. The Draft SPD therefore must be viewed in the context of existing policies CS5 and CS9 of the existing Core Strategies. The Draft SPD sets out that it has been prepared in accordance with current national policy.</p> <p>Historic Delivery – Section 1 Paragraph 1.9 of the Draft SPD summarises recent levels of affordable housing delivery within West Suffolk on larger sites (10 units and above). It states that the council has been successful in delivering over 30% affordable housing in the context of achieving against local plan targets of 30% from sites of 10 units or more. Large sites are reported to have delivered 32% affordable housing but it is unclear the tenure make up of this delivery, who delivered it (e.g. majority affordable RP or local authority led schemes) or if grant funding (historic or recycled capital grant funding) enable higher than average delivery.</p>	Monitoring of affordable housing delivery is in line with the requirements of the Annual Monitoring review. Internal monitoring of all schemes is held by the Strategic Housing Team and requests for information can be made available.	No change required.

	<p>Although retirement housing typologies appear to be treated as general needs C3 development typologies, there is no breakdown of affordable housing delivery from this specific typology. Recent changes to the PPG require that Councils should assess housing needs for older people in greater detail and establish targets and measure delivery. The PPG section on housing for older people also alludes to the viability constraints associated with this housing typology.</p> <p>National Policy – Section 2 The Draft SPD references the 2019 NPPF and by association, the NPPG which now supports the revised NPPF. The current NPPG makes it clear that specific viability concerns may need to be taken into account where particular types of development are proposed which may significantly vary from standard models of development for sale (<i>for example build to rent or housing for older people</i>). The NPPG is also now clear that <i>different requirements may be set for different types or location of site or types of development</i>. It is therefore envisaged by the most recent national policy and guidance that the viability of the delivery of different types of housing (in comparison with the mainstream housing market) requires closer scrutiny at both the plan making and decision making levels. Not all C3 housing proposals are alike and should not be treated as such in policy terms. It is appreciated that work is underway to prepare a new local plan policy but the above points should be factored into the evidence base underpinning any emerging guidance. One</p>	<p>Acknowledged and will be put forward as consideration as part of the Local Plan examination.</p>	
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	<p>of the drivers of the NPPG relating to viability matters is providing certainty for all stakeholders and the Consortium is of the view that this is particularly important for our sector given that they specialise in non-mainstream housing development.</p> <p>Housing Needs of Older People National Guidance as summarised above is clear that in order to establish a local plan policy seeking affordable housing, housing need by typology must be established and that once need is established and balanced against viability considerations, different targets may be set in policy for different types of sites and different types of development. <i>1 Paragraph: 004 Reference ID: 63-004-20190626,</i> <i>Paragraph: 006 Reference ID: 63-006-20190626</i> <i>2 Paragraph: 007 Reference ID: 10-007-20190509</i> <i>3 Paragraph: 001 Reference ID: 10-001-20190509 3</i></p> <p>The Cambridge Sub Region SHMA (2013) provides at Section 15 an overview of the housing for older people position within the area. The Housing Commission Priorities set out are for the provision of a range of housing types and tenures to enable choice. No specific target analysis of tenure requirements within this housing typology appears to have been undertaken, however. Providers are therefore unclear as to the actual need for affordable housing tenures for older peoples housing and based upon experience of working in the area are likely to be subject to a generic all C3 affordable housing target which is unlikely to be reflective of specific typology need.</p> <p>The Consortium would strongly encourage the Council</p>	<p>Acknowledged and will be put forward for consideration as part of the wider evidence base to form part of the Local Plan examination.</p>	
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	<p>to robustly examine housing needs within the older persons housing typology. In light of recent changes to the PPG as summarised above, it is appropriate to have a typology specific set of targets in respect of proposals for housing for older people.</p> <p>Certainty – Section 3</p> <p>This comment echoes earlier ones in relation to certainty of developer subsidy. At paragraph 3.5, the Draft SPD states that the Council’s preference for affordable housing types will be formally disclosed at the time of negotiations based upon what the Strategic Housing team consider the priority need is at that time. Such an uncertain approach makes it difficult for providers of specialist housing to secure and enter into land contracts when the subsidy required to provide affordable housing is unknown. The PPG states in this regard:</p> <p><i>Policy requirements should be clear so that they can be accurately accounted for in the price paid for land.</i></p> <p>In relation to the tenure of affordable housing considered acceptable (paragraph 3.11), it is clear that these relate primarily to mainstream housing typologies and in the Consortium’s experience, intermediate types of affordable housing may be more suitable to retirement developments in addressing need given that many of those moving into sheltered accommodation will tend to have equity in their own homes. Similarly, Table 1 on page 14 sets out the tenure requirements as they apply to mainstream housing with little consideration for specialist typologies.</p>	<p>The Council’s requirement for affordable housing is set out in the current local plan documents. It is recommended that developers take this into consideration prior to securing a deal with the landowner to ensure all the council’s planning obligations are met.</p> <p>This is the council preferred option based on the latest housing needs evidence.</p>	
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	<p>Extra Care and Sheltered Housing Schemes – Section 3</p> <p>The Consortium is firmly of the view that affordable housing policy must not apply to extra care housing proposals. The Draft SPD states that a measure of whether extra care proposals should be subject to affordable housing policy should be based upon the nature and type of service and accommodation in a scheme.</p> <p>The appeal inspector for the Pegasus Life proposal in Sidmouth states that</p> <p><i>I do not accept the Council’s criticisms of this range, albeit broad. Whilst many of the activities listed might be taken for granted by most people, every one of them is likely to become more challenging in advancing years. Many residents might only require relatively limited personal care, perhaps the minimum amount of 2 hours per week, but there are also likely to be many who require substantially more than this. Furthermore, the age restriction associated with the development is such that the need for personal care will inevitably increase for many people with age. I accept that not all people will require the same level of care at the same point in their life, but what is important is that care is available to meet their individual needs as and when the time comes. That is what the scheme seeks to provide (44).</i></p> <p><i>The planning obligation would provide certainty in restricting the age of primary occupants and ensuring that a minimum level of care is needed and taken up by future residents (51).</i></p> <p>Good points of reference in this regard are the RTPI Good Practice Note No8 and the Housing Lin note Extra Care Housing <i>What is it</i> both of which provide guidance on how</p>	<p>Acknowledged. Will be put forward for consideration as part of the wider evidence base to inform the Local Plan examination.</p>	
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	<p>individual schemes should be assessed in this regard. The Consortium therefore requests that all extra care proposals are exempted from the affordable housing policy due to the minimum level of care offered by such proposals. This will allow the necessary certainty for providers to plan and secure land for what after all meets an identified housing need locally and brings with it considerable benefits . Appeal Ref: APP/U1105/W/17/3177340 5</p> <p>On Site Delivery of Affordable Housing – Section 3 Paragraph 3.21 requires that where an extra care scheme is considered liable for affordable housing contributions this will be expected to be provided on site and in accordance with the overall 30% affordable housing requirement and that this will depend on the size of the site. As already established the Consortium is of the view that Extra Care proposals should not be subject to the affordable housing policy due to the minimum level of care provided in all cases which in planning use terms would make the proposal a C2 use class as demonstrated by the Sidmouth decision mentioned already. At paragraph 4.14 the Draft SPD talks about ensuring that developers avoid design resulting in high maintenance and service charges. Typical retirement blocks are located on constrained brownfield sites in or on the edge of town centres and will often preclude the creation of separate blocks. Occupiers of single blocks will in nearly all cases be required to pay equal service charges and the nature of successful retirement proposals is that service charges for maintenance of enhanced communal areas will make on site</p>	<p>Acknowledged. This will be put forward for consideration as part of the wider evidence base to form part of the Local Plan examination.</p>	
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	<p>provision unaffordable for those paying Affordable Rent. Perhaps the most relevant example in this context of an off-site provision rather than on site being most appropriate on a retirement development is the Churchill Retirement Living scheme in Haverhill. The Inspector for the Haverhill scheme concluded:</p> <p><i>Having considered the evidence over the practicalities in relation to service charges, management arrangements and viability (should this demonstrate provision be significantly below 30%), and over the priority locally for family- sized affordable homes, I am persuaded that this scheme would not lend itself to affordable units being part of the development. This has been demonstrated to be the case with other similar developments where on-site affordable housing provision has proved impractical (18).</i></p> <p>Commuted Sums – Section 4</p> <p>We are pleased to see a methodology within the Draft SPD which provides detail in relation to a commuted sum approach. However, we believe the approach should be clear that it relates to the open market value of a comparable property within the area and not specifically new build property. Appeal Ref: APP/E3525/W/16/3161310 6</p> <p>We understand the intention of the proposed methodology is to enable an RP to acquire priority need property on the open market quickly which in most cases will be existing properties.</p> <p>Appendix 3 provides a worked example referring to a 30-unit scheme in Newmarket with no detail of mix. It then goes on to refer to a three-bed semi-detached property. This</p>	<p>Acknowledged. The deliverability and viability of older persons care homes will be considered further as part of the Local Plan examination.</p>	
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	<p>example presumably reflects broadly what the original development proposed? If not, then the methodology will not reflect a broadly equivalent off-site contribution.</p> <p>At 4.34, the Draft SPD states that if there are a large number of affordable dwellings the council may assess the contribution based upon a mix of affordable rented and intermediate dwellings which implies that the starting position is 100% affordable rent for off-site provision. This approach appears illogical given the on-site position is for a mix of affordable tenures. As per earlier comments regarding tenure, the Council should firstly assess the specific tenure requirements for this typology and establish the viability of deliverability in order to establish certainty for providers.</p> <p>Clawback – Section 4 and Appendix 1</p> <p>We note that the SPD makes mention of so-called claw back provisions and sets out at Appendix 1 and an example of clawback for on-site provision. We would point out here that the NPPG7 requires that such policy should only be sought to be introduced in Local Plans and not SPD. The PPG in relation to planning obligations explicitly states that it is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.</p>	<p>Removed from SPD.</p>	
Clare Town Council	<p>The Council has no further comment to make at this stage in relation to the SPD consultation.</p>	<p>Response gratefully received and relevant departments contacted regarding the Housing Register</p>	<p>No change required</p>

	<p>However, it would like to draw your attention to the reported difficulty some residents have in managing the online registration process which in turn limits their ability to access the Housing Register. Please could you draw this to the attention of the relevant department within West Suffolk and signpost where the Town Council should refer such residents to within your organisation for support?</p> <p>Also, the Council would like to undertake a housing needs survey of its residents - can you put us in touch with anyone at the District Council who could help us pull this together/ avoid us doubling up on data which is already in your possession and which you are able to share.</p>	<p>process and Community Action Suffolk undertaking a Housing Needs Survey.</p>	
<p>Rural Task Group</p>	<p>Discussions were held around the use of Shared Equity and Shared Ownership Schemes to enable property purchases and whether this was an option which should be considered by West Suffolk Council. Should the Council be directing some of its capital towards the provision of affordable homes through a shared equity scheme model? - Should County Farms be encouraged to release land for rural housing development? - Small scale rural exception sites were a key area where affordable housing could be provided, but this would need the co-operation of landowners, the community and registered providers of social housing. This was noted by the Taskforce this could be an emerging area of recommendation – the Council playing a more proactive role in developing/applying policy that helped bring exception sites forward where there is local support and leadership, for example via a neighbourhood plan or a development brief for</p>	<p>Response gratefully received. Comments are not specific to the Affordable Housing SPD and are dealt with as part of the NPPF and Affordable Housing Guide.</p>	<p>No change required.</p>

	a site. - Parishes should be offered the opportunity to undertake a Housing Needs Survey which would then provide data on housing need at a local level and provide vital information to help plan new developments.		
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