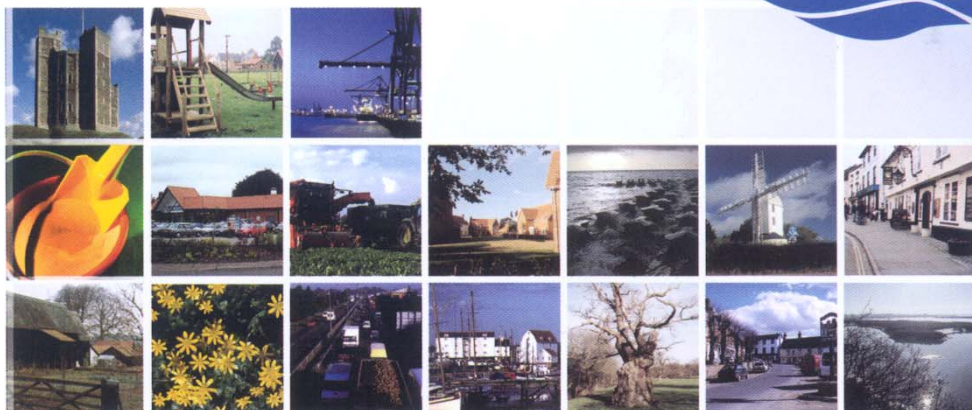


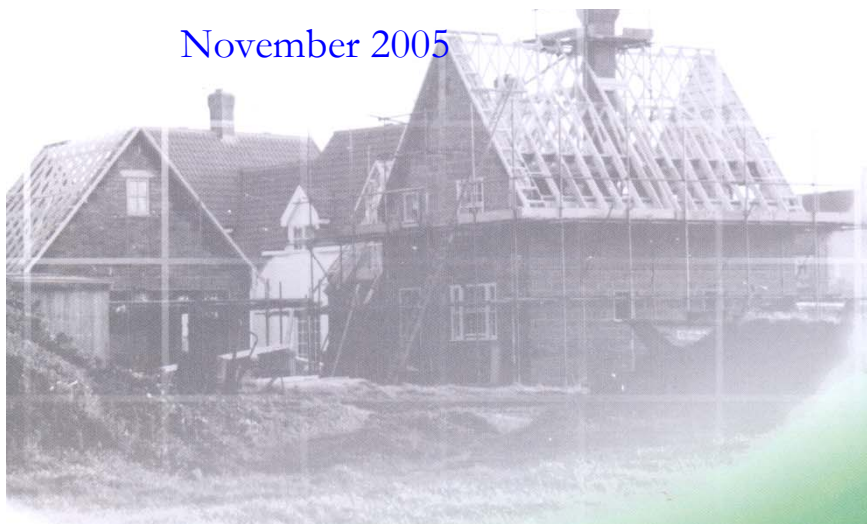
The Suffolk Coastal Local Plan

Second Alteration



Affordable Housing Proposed Modifications

November 2005



SUFFOLK COASTAL LOCAL PLAN

SECOND ALTERATION

The Suffolk Coastal Local Plan was adopted in December 1994. The First Alteration to it was adopted in February 2001.

Proposals for a second Alteration, dealing specifically with the subject of affordable housing, were placed on first deposit on May 14th 2004. Following consideration of the responses the Council resolved to proceed to a public inquiry without a second deposit. The public inquiry was held on March 15th 2005.

This document contains the following parts:

- PART 1 the inspector's report of the inquiry
- PART 2 the response of Suffolk Coastal District Council to each of the inspector's recommendations
- PART 3 the proposed modifications arising from such consideration or
- PART 4 the District Council's reasons for not proposing modifications following such consideration
- PART 5 the text of part of the Suffolk Coastal Local Plan, incorporating the Second Alteration as proposed to be modified in (3) above

There is now the opportunity to submit representations of support or objection to the proposed modifications or the District Council's reasons for failing to propose modifications if recommended by the inspector.

The period in which to submit representations of objection or support expires on Monday 19th December 2005. These must be submitted on forms, which are available:

- from the address below
- by telephoning (01394) 444291
- by e-mailing development.policy@suffolkcoastal.gov.uk
- from the Council's web site www.suffolkcoastal.gov.uk

Representations received in any other form, or after the date specified will not be accepted.

Representations must relate to the Council's response to the inspector's report, namely Parts 3 and 4. The following will be deemed to be invalid:

- representations on the inspector's report itself rather than the Council's response to it
- representations on contents of the Local Plan other than in relation to policies AP37 and AP38
- the resubmission of representations or repetition of issues already considered by the inspector at the public inquiry

In submitting a representation please indicate clearly:

- the reference number concerned, as specified in Parts 3 and 4;
- the change which is required

If your representation involves more than one item you must submit a different form for each item involved.

Head of Planning
Suffolk Coastal District Council
Melton Hill
WOODBIDGE
Suffolk
IP12 1AU

November 2005

**PUBLIC INQUIRY INTO OBJECTIONS TO THE
SUFFOLK COASTAL LOCAL PLAN 2ND ALTERATION**

15 March 2005

Report of Geoff Salter BA MRTPI Inspector

POLICY 37A

1.1 GENERAL

Objections

18	Framlingham Town Council
41,80-81	Peacock Short
42	Briarley Homes
43	Framlingham & District Development Trust
45	House Builders Federation
51	British Telecom
53-55	GoEast
64	Trinity College & others

Issues

- a. Is the Housing Needs Survey soundly based?
- b. Has it identified the correct level and nature of need?

Inspector's Reasoning and Conclusions

Housing need

The Council's housing needs survey was undertaken in 2000. Previous surveys had been carried out at 5 yearly intervals and the Council accepted that a new survey was needed; it would be undertaken in 2005 on the same basis as previous surveys. The survey involved 3,242 responses, which is sufficient to justify a confidence rate of over 95%. However, these figures are clearly outdated and may not reflect the current position with regard to the level of affordable housing need throughout the district.

The Council pointed to supplementary village studies carried out by parish councils. These are limited in their coverage and only a small proportion of the many villages in the District have been surveyed recently. I agree that it would not be appropriate to identify the particular needs of various settlements in the District in the Local Plan without more comprehensive surveys. However, the available information for some of the villages does give an indication of local needs in certain areas, and to an extent supports the Council's case concerning the District-wide need.

The 2000 District-wide survey pointed to a requirement of 484 dwellings each year (pa). As the House Builders' Federation (HBF) said, this is greater than the Structure Plan dwelling requirement for the whole district for all types of housing, which was 470 pa.

The Council argued that it was seeking as affordable housing about one third of the total remaining provision for the rest of the Structure Plan period to 2016, ie about 180 dwellings pa. The results from the housing survey may have included those who had a desire, rather than a strong need, to set up a new household. However, even allowing for some over-estimate, the survey indicates a strong need for more affordable homes in the District. This was reinforced by other

information about homelessness. At present those on the homeless register were spending 37 weeks in temporary accommodation. Although the number of people needing a home immediately was less than that shown in the 2000 survey, this reflected changes in the advice given to those requesting assistance and the removal of asylum seekers from the list.

Changes in local house prices are clearly directly related to the level of need for affordable homes. The District had experienced a substantial increase in average house prices since the last survey, reflecting national changes. The Council produced evidence from the District Valuer's Office for the period from 1999 to 2004 to show that over the last 5 years the average prices of both pre-1919 three-bedroom terraced houses and modern two bedroom flats had risen by about 150%. Incomes, however, had not risen by the same amount; annual gross earnings in the district had grown from about £17,000 to just over £23,000 pa, an increase of about 36%.

Taking all these factors into account, whatever the deficiencies of the rather outdated survey data, it seems unlikely that the level of need has diminished since 2000. Indeed, the widening gap between house prices and average income levels suggests that the need for affordable homes may have increased. The indications are that the Council's suggested requirement for 180 dwellings each year would not be an overestimate. I discuss the issue of whether this represents a unusually high level of need in comparison with other districts in Suffolk and the wider region below.

RECOMMENDATIONS

1.1 No modification

EXCEPTION SITES

Objections

26	Suffolk County Council
35	Parham Parish Council
50	County Cllr J Girling
54	GoEast
62	Countryside Agency
73	Mr Crisp
85,86	Peacock Short

Issues

- a. Should the defined market towns be included?
- b. Should any other towns be included?

Inspector's Reasoning and Conclusions

Market towns

Policy CS9 of the Structure Plan allows for 'exceptional needs' rural housing on 'appropriate small sites adjoining villages'. The identified rural settlements do not include the market towns now set out in the policy in these Local Plan Alterations. However, government policy on this issue has changed recently with the publication of changes to paragraph 18 of Planning Policy Guidance note 3 – Housing (PPG3) in January 2005. This refers to the potential need for rural exception sites policy to support the provision of solely affordable housing on land within or adjoining small rural communities which would not otherwise be released for general market housing. The reference to rural 'communities' (rather than 'villages') is linked to a footnote which refers to rural settlements as defined under Section 17 of the Housing Act 1996 with respect to 'right to buy' provisions, as set out in SIs 1997/620-625 and 1997/1307.

For Suffolk Coastal District, these settlements include Aldeburgh, Framlingham, Saxmundham and parts of Leiston, in addition to the villages previously identified in Policy CS9 of the Suffolk Structure Plan. In general these villages and the towns are relatively small settlements with little scope for additional infill development. All but one of the towns have a population of under 2,500-3,000 persons and have some facilities, but are not major service centres. During my site visits I saw that the market towns have compact centres, with tight built form, much of which is designated as Conservation Areas. Outside the centres are modern housing estates, again with limited scope for substantial infill development.

To allow rural exceptions sites on the edge of the settlements identified would significantly add to the opportunities to provide affordable housing and would be consistent with government policy in PPG3. Apart from Woodbridge with West Melton, the policy and would comply with right to buy provisions, with the other minor exception of 'parts of Leiston'. The map identifying this area to which the circular refers does not exist, and the reason for this exception is not explained. At the RTS there was supposition that the partial exclusion might relate to evacuation requirements for Sizewell power station. However, I understand that the recommended limit on the number of residents within a 5 mile radius of the

power station may have been reached, but was no longer enforced. Having visited Leiston and seen the local highway network, I see no reason to exclude other part of the small town, given the likely scale of any affordable housing development resulting from this policy. The current legislative provisions with regard to right-to-buy at Leiston seem an anomaly, which the policy would help to address.

However, Woodbridge is a larger settlement of about 7,400 persons, with different level of potential for infill. The Council argued that the town and the neighbouring village of Melton also had tightly developed centres, with several important listed buildings, which restricted development opportunities. Other parts of the town are characterised by larger houses in more extensive plots. Nevertheless, from my visit to the town I find it hard to imagine that no residential development sites will come forward within the plan period. The evidence did not include any urban capacity study to provide detailed support for the point that development opportunities were very scarce; I do not consider the form and size of the settlement creates any unusual problem for residential developments.

The town is not excluded from the right to buy provisions and any affordable housing provided under the terms of the policy would not be assured for the future. The council pointed to high house prices in Woodbridge, at similar levels to those in other market towns and villages. However, even though the level of discount offered would be less than other areas, future occupants of any affordable housing scheme would be able to exercise their option to buy the property under current housing legislation. While few tenants in Woodbridge have exercised this right to date, future circumstances may be different and the Council would have no assured means of retaining any new stock created by the policy. To allow this dispersal of new residential development on the edges of towns without the sound planning reason of making a special case to address particular local needs, planning policy for the area generally would be undermined.

A similar argument applies to the much larger settlements of Felixstowe and the Ipswich suburbs, which have even more scope to meet affordable housing needs. At present Felixstowe has a firm boundary along the northern edge, its sole potential area for expansion. I can find no good planning reason to apply the policy to this settlement therefore.

RECOMMENDATIONS

- 1.2 Modify the Plan by deleting Woodbridge, including Melton, from the list of settlements to which the policy applies.

SETTLEMENTS IN THE AONB

Objections

10	S E Clover
13	A M A Crawford
14,71	Suffolk Coast & Heaths Unit
16	Waldringfield Parish Council
23	J C Clark
32	J C Barclay
33	F R Matheson
73	B Crisp

Issues

- a. Should villages within the Area of Outstanding Natural Beauty (AONB), such as Waldringfield, be excluded?

Inspector's Reasoning and Conclusions

General

As the Council quite rightly point out, the location of any village or site within the AONB does not necessarily mean an embargo on any future development. Existing planning policies in the Local Plan (AP12) the Structure Plan (ENV7) and government policy in PPS7 all re-state the broad objective of preserving and enhancing the natural beauty of the AONB and seek to prevent development that would have an adverse impact on the landscape. Policy AP37A specifically includes caveats concerning the relationship of any new affordable housing developments to the scale and character of the town or village and preventing a precedent for ribbon development. However, the wider policy context recognises that AONB designation should allow social needs of local communities to be met through small scale developments that are in sympathy with the character of the area.

Affordable housing is still needed to meet the needs of local communities based in villages lying within the AONB. I acknowledge that there are cost constraints on the providers of affordable housing but these need not mean poor quality housing. Policy AP12 of the Local Plan requires a 'high standard of design and landscaping and other appropriate measures to minimise the impact of a development on the landscape'; further requirements are set out in Policy AP21. Some affordable housing schemes have already been achieved in the AONB without compromising this important objective.

Waldringfield

Turning to specific objections, as a matter of principle it would be inappropriate to exclude particular villages, such as Waldringfield. I saw that this is an attractive village but no doubt others would claim to be of equal environmental value. A recent Housing Needs Survey identified a need for 13 units in the settlement and there is no ground to exclude the village from the policy on this count. I understand that there is some traffic congestion during summer holiday peak periods, but any proposals should not be permitted unless they meet relevant highway safety criteria. Any scheme would have to meet other policies of the Plan which apply strict environmental standards to any development in the AONB

Hollesley

The purpose of the policy is to allow rural exception sites to be approved to meet known local needs within or adjoining settlements. I agree with the Council that as a matter of general principle it would not be appropriate to counter the broad thrust of the policy by allocating specific sites that had not been subject to full scrutiny through inclusion in the deposited Plan at this stage.

This particular site lies at a relatively isolated location about 800m north of the centre of Hollesley, well beyond reasonable walking distance of any social or commercial facilities. I share the Council's concerns that the type of 'self build' proposed would meet the objectives of the policy, although any scheme would be required to be developed subject to a relevant undertaking to ensure the dwellings would remain affordable in perpetuity. In these circumstances I consider the objection should not succeed.

RECOMMENDATIONS

1.3 No modification

IMPLEMENTATION MECHANISMS

Objections

11	Mr & Mrs Turner
12	Framlingham Properties Ltd
17	Mr S Beaumont
20	Rural Housing Trust
64	Trinity College & others

Issues

- a. Should the housing be provided solely by RSLs?
- b. Does the policy cater for key workers?

Inspector's Reasoning and Conclusions

HBF and other objectors argued that the policy should be re-worded to allow other agencies than RSLs, for example the housebuilders themselves or other non-profit making organisations, to provide affordable housing. The Council argued that it was essential that any additions to the stock of affordable housing should be retained in perpetuity to meet the needs of future generations. This was not disputed but I consider the Council's concerns about the financial stability of any other provider, and hence the certainty of retaining the affordable housing, to be overly cautious. I see no reason why any legal agreement drawn up in accordance with the last sentence of the policy should not include provisions to ensure the permanent retention of the dwellings in the event of a change in circumstances of the provider.

Neither the objector, nor any other party, provided evidence of any specific shortages of key worker housing. However, should a problem arise there is no reason why the provisions of the policy should not be implemented to deal with the issue.

RECOMMENDATIONS

- 1.4 Modify Policy 37A by deleting from the last sentence the words '*by a Registered Social Landlord and*'.

MISCELLANEOUS

Objections

11	Mr & Mrs Turner
12	Framlingham Properties Ltd
22, 72	B Crisp
44	M J Parkinson
46	Kirton & Fakenham PC
48	N S Cawthorne
49	The Environment Agency
58,59	Mr & Mrs T Mason

Issues

- a. Various miscellaneous points about policy details and omissions

Inspector's Reasoning and Conclusions

Policy 37A allows for development on greenfield sites outside the village and town boundaries as an exception to settlement policy. It does not allow for market housing and should not undermine existing controls on such development. To counter another objection, the policy is necessarily restrictive; to allow market housing on greenfield sites on the edge of settlements would undermine general planning policy, as Annex B to PPG3 states. The policy contains other criteria which encourage development patterns to be sustainable, wherever possible. Any affordable housing schemes are required to be well-related to the existing form of the settlement and would have to comply with all normal planning requirements with regard to design (see paragraph 1.3.1 above), access, and landscaping. The criteria of the policy cover a sufficient variety and number of factors that should be taken into account, bearing in mind that other policies of the Plan, such as AP27, also continue to apply.

In practice the use of planning obligations is a highly effective way of ensuring that development is controlled to meet the aims of the policy to provide affordable housing in full. Although there is a need to retain a stock of smaller dwellings in the countryside, as Council statistics about demand for one or two bedroom units confirm, I consider it would be unrealistic to try to prevent extensions to any homes permitted under this policy. It would be unreasonable to require a household to move if it was prevented from modifying its home to meet changed circumstances, for example.

I agree with the Council that there is no need to cross reference the policy to other policies in the Plan. Concerns about the adequacy of infrastructure to cope with flooding, sewage disposal and surface water are all dealt with by Policies AP92-94 respectively.

RECOMMENDATIONS

- 1.5 No modification

POLICY 38A

RATE OF 1 IN 3

Objections

37	Trimley St Mary PC
38	R Kerry
57	Benhall & Sternfield PC
67	Suffolk Preservation Society
70	Framlingham Properties Ltd
88	House Builders' Federation (HBF)

Issues

- a. Is the provision of 1 affordable dwelling in 3 the correct rate?

Inspector's Reasoning and Conclusions

The rate of provision of affordable dwellings on mixed-tenure housing sites, at one dwelling in three, was broadly accepted by parties attending the RTS. The Council's housing survey indicated that a substantial proportion of the new housing should be affordable by those in greatest need locally and recommended a minimum rate of 30% on new sites. The figure of 1 in 3, amended to reflect the suggested lower thresholds, represents a reasonable target for negotiations with developers of mixed tenure sites. Draft RSS13 endorses this level of provision in the wider regional context. Taking into account my findings on need, and the relatively small numbers of new affordable homes that had been constructed over the last 5 years or so, I consider that the suggested rate of provision is reasonable and accords with that found in many other local planning authorities.

Some objectors commented that the wording of the policy should be more flexible, by not applying a 'blanket' requirement but stating a preference for **up to** 1 in 3 of new stock. I note that the policy 'expects' rather than requires, provision at this rate. It also allows a reduction in the amount of affordable housing if the circumstances at any particular site provide a sound reason for a variation. One of the main concerns of some objectors, the likely effect of the policy on the viability of individual developments, could be taken into account when applying this clause. The HBF accepted that the policy provided some flexibility. While the rate of 40% suggested by two objectors could well prejudice the viability of a number of schemes if applied rigidly, the policy does allow for some variation in the rate of provision to meet local circumstances. I consider that taken as a whole, the requirements are reasonable.

RECOMMENDATIONS

- 2.1 No modification

THRESHOLDS

Objections

7	Network Rail
19	J Ranson
27	V Ranson
42	Briarley Homes
52	S Youngs
55	GoEast
56	Peasenhall Parish Council
66	Suffolk Preservation Society
70	Framlingham Properties Ltd
72	B Crisp
87	Peacock Short
88	HBF
89	Trinity College

Issues

- a. Are the proposed thresholds of 3 and 6 dwellings appropriate?

Inspector's Reasoning and Conclusions

Many objectors thought that the threshold above which the policy would apply was much too low and that sites would be blighted by onerous and costly requirements for affordable housing. Government advice in Circular 6/98 states that requirements for affordable housing in settlements with a population of 3,000 or more should apply to sites capable of accommodating 25 dwellings or more. The Council argued that this advice was outdated, following the publication of a revised draft circular in July 2003 – *'Influencing the size, type and affordability of housing'*. This was followed by a further consultation in January 2005 – *'Planning for Mixed Communities'*. Both documents included a threshold of 0.5ha or 15 dwellings for all settlements.

Other objectors questioned the viability of providing affordable housing in small numbers on a range of sites scattered throughout the District. The Council accepted that this would not be the most efficient way to meet local needs, but pointed to existing management operations where a provider managed a number of units in different locations, as the Council itself used to do. At present there are 6,100 units spread over 93 parishes. Therefore, while a widely spread portfolio of properties may prove to be a disincentive for some providers, I do not consider that meeting local needs through disaggregated provision would be a strong reason in itself to revise the thresholds.

Nevertheless, I consider the policy contravenes current government policy in circular 6/98 and some special justification based on local circumstances would be required. *'Planning for Mixed Communities'* indicates that a local planning authority may wish to set a lower threshold in all or part of its area where it has high levels of need that cannot be met on large sites alone and/or where the majority of supply comes from smaller sites. The Council's figures show evidence of clear needs and a potential shortage of supply outside the main urban areas. In the last 5 years there has been a significant supply of affordable housing as part

of larger developments, mainly on the edge of Ipswich. The Council argued that this source was unlikely to be maintained. However, the revised policy threshold would be unlikely to result in a step change in provision; on past figures it would yield only 20 or so more units each year.

Looking at a wider context of affordable housing need, the requirements in Suffolk Coastal are not substantially greater than anywhere else in the county, despite the sizeable proportion of 2nd homes. At the RTS the Council provided copies of the statistics quoted by the HBF from the most recent Joseph Roundtree Foundation survey which showed house prices relative to incomes. Suffolk Coastal had the 2nd lowest ratio in Suffolk (at 3.72) after Forest Heath (3.68). This evidence does not support the argument that the special circumstances required to vary national policy apply across the whole district in this case. It should be possible to address particular needs in the villages and small towns away from the Ipswich fringe, Felixstowe and Woodbridge/Melton through application of Policy 37A.

Although there is no firm evidence concerning the effect of low thresholds on the viability of schemes, clearly the proposed policy could well discourage development of small sites. The policy does allow for negotiation if developers can show that provision of affordable homes would not be economic. However, from the evidence about house prices and need generally I am unconvinced that conditions in Suffolk Coastal are much more difficult than those in other areas of the county or the eastern region generally. The thresholds are part of a whole policy package which includes the 'exceptions' policy for sites on the edge of the villages and market towns, which should generate additional affordable dwellings. In these circumstances, bearing in mind the consistent thread of draft government policy over recent years, I consider the threshold should be revised to 15 for those parts of the District where the exceptions policy does not apply. For the smaller settlements in the rural areas identified in Policy 37A, I consider the evidence does not justify what would be a significant departure from the general thresholds advised in emerging government policy. I have concluded therefore that a threshold of 9 would be appropriate for these small towns and villages. If updated survey information indicates an even greater need, the policy could be reconsidered when a new Local Development Document is prepared as part of the Local Development Framework.

AONB

I have dealt with general points of principle with regard to AONB policy in paragraphs 1.2.5-6 above. As I have already stated, I consider that Policies AP12 and AP21 provide sufficient safeguards against any new affordable housing scheme having an unacceptable effect on the beauty of the AONB.

RECOMMENDATIONS

- 2.2 Modify the Plan in the bullet points of Policy 38A by replacing *six* with *fifteen*, and *three* with *nine*.

FLEXIBILITY

Objections

88

House Builders Federation

Issues

- a. Is the policy sufficiently flexible?

Inspector's Reasoning and Conclusions

I have dealt with the substance of this objection in paragraph 2.1.2 above. I note that the policy is framed as an expectation of the rate of provision, rather than an absolute requirement. The policy includes a reasonable list of factors to be taken into account which may lead to a reduced level of provision in exceptional cases. The survey information underpinning the need for the policy was obtained on a local area, rather than District wide basis. However, I consider it appropriate to include a policy for the whole District, but to allow for some flexibility in application if local circumstances warrant, taking into account the listed criteria.

RECOMMENDATIONS

2.3 No modification

LOW COST HOMES

Objections

82-84 Peacock Short

Issues

- a. The number of low cost homes required is disputed, and should in any event be left to the market.

Inspector's Reasoning and Conclusions

The Housing Needs Survey showed that 76% of new households were seeking one or two bedroom units. Recent general demographic trends indicate that this proportion is unlikely to reduce. Given the much smaller proportion of the total housing stock of this size, I consider the text of the Plan to seek a target of 450 low cost market homes (derived from the same survey) is reasonable. In fact the text justifies the need for policy AP36, which seeks a variety of house types within open market housing schemes.

However, at the RTS there was some discussion about the real meaning of paragraph 23 of the supporting text. The Council made clear its intention that for the purposes of Policies 37A and 38A the definition of affordable housing included only housing for rent and shared equity housing. 'Low cost' market housing, without any form of subsidy, would not be considered to meet the requirements of the policies, on the grounds that even the cheapest market housing would be beyond the means of those classified as being in housing need. Taking into account the evidence about house prices in the district I consider this approach reasonable, but suggest that the text of paragraph 23 be amended to make this point clear.

RECOMMENDATIONS

- 2.4 Modify the Plan by excluding Low cost (unsubsidised) market housing from the definition of affordable housing as it related to Policies 37A and 38A.

MISCELLANEOUS OBJECTIONS

Objections

2	Lorrimar Investments Ltd
3	Carlton Hall Developments Ltd
4	Merchant Projects Ltd
5	SHE (Developments) Ltd
6	Briarley Homes Ltd
18	Framlingham Town Council
31	Suffolk Acre
34	Martlesham Parish Council
36	Hazel Blackshaw
39	Trimley St Mary Parish Council
60	Mr and Mrs T Mason
68,69	Suffolk Preservation Society
77	Suffolk Acre
79	Parham Parish Council
82,83,84	Peacock Short

Issues

- a. The policy should distinguish between "greenfield" and "brownfield" land (Nos 2 to 6).
- b. There should be an element of flats or apartments; the density of proposals should be clarified (Nos 18 and 39).
- c. The criteria concerning proximity to services and other planning issues should not be included; they may reduce the provision of affordable housing (Nos 31 and 77).
- d. The lack of mention of suitable access (No 34).
- e. Affordable housing should not be in the form of estates but part of an integrated mixed development, with consideration of existing amenity (Nos 36, 60 and 69).
- f. The time scale of paragraph 4 is not stated (No 79).
- g. Levels of cash in lieu should be identified clearly (No 68)

Inspector's Reasoning and Conclusions

Greenfield/brownfield

I accept the objectors' point that housing on 'brownfield' sites is likely to incur higher development costs than greenfield. However, the Council's policy to achieve a high proportion of new housing on previously developed land is fully in accord with government policy in PPG3. Although a small amount of affordable housing may be provided on 'greenfield' sites as rural exceptions, the majority is likely to be built within town and village boundaries on brownfield sites. As the Council say, the value of such development sites will be affected by the known requirement for a proportion of affordable housing. The policy incorporates criteria which allow for reduced provision if that can be justified by economic circumstances.

Proportion of flats

Affordable housing may well be provided in flats or apartments and the policy does not need to be changed to allow for this. In any event Policy AP36 seeks a variety of house types in all residential schemes. Similarly, other Plan policies, and the need to comply with guidance in PPG3, require developments to be of adequate density but of good design.

Proximity to services

Many occupants of affordable housing are likely to suffer from low incomes and are likely as a group to have lower rates of access to a private car. I consider the inclusion of a criterion which seeks prevent such residents from being further disadvantaged by lack of available local services is reasonable. While I have some concerns about the inclusion of a 'catchall' criterion, it is right to recognise that many planning decisions are the outcome of a balancing exercise in which a number of factors are relevant.

Suitable access

Any affordable units provided under this policy as part of a larger housing scheme would be subject to a number of general requirements set out in other policies such as AP26 or AP27, which include the need for safe access.

Mixed developments

The policy sets out the main principles for affordable housing provision but these are amplified in the Council's Supplementary Planning Guidance. Paragraph 7.19 deals specifically with the points concerning the need to ensure that affordable housing becomes integrated within existing communities and meets normal environmental standards. I consider that these two strands of policy documents provide adequate safeguards.

Timescale

Paragraph 4 follows on from a reference in paragraph 3 to a need for 484 each year from 2000 to 2005. At first glance one would assume that the total target of 450 homes related to the same period. Some clarification may be desirable, but is not essential and is not the subject of a formal recommendation.

Cash in lieu

I consider it would be unrealistic to attempt to set out exact financial payments to be required from developers, which may vary according to the different physical circumstances at each site. Further information is available in SPG and from information published by the Housing Corporation. I consider therefore it would be inappropriate to make the policy more detailed.

RECOMMENDATIONS

2.5 No modification

APPENDIX 1

APPEARANCES

FOR SUFFOLK COASTAL DC:

Stephen Brown BA MRTPI	Development Plans Officer
Mike Eaton BSc MCIEH	Head of Housing and Benefits

OBJECTORS:

Paul Cronk BA DipTP MRTPI	Regional Planner (East), HBF
Mel Fleming	Environment & Transport Directorate, Suffolk CC
Mr Cobbold	Peacock Short
Stephen Beaumont	Town & Country Consultants Ltd
Mr T & Mrs G Mason	
N S Cawthorne	

APPENDIX 2

DOCUMENTS

TOPIC PAPERS:

- TP 1 District Council Witnesses
- TP 2 The Development Plan
- TP 3 National Policy, Policy Guidance and Reports
- TP 3 Addition
- TP 4 Statistics

DOCUMENTS:

- DOC 1 Suffolk Coastal Local Plan Second Alteration - Deposit Document (May 2004)
- DOC 2. Suffolk Coastal Local Plan Second Alteration - Statement of Publicity (May 2004).
- DOC 3 Suffolk Coastal Local Plan Second Alteration - Environmental Appraisal (April 2004).
- DOC 4. Notice of Deposit
- DOC 5. Notice of Public Local Inquiry
- DOC 6. Summary of Representations
- DOC 7 Draft Supplementary Planning Guidance - Affordable Housing (August 2003).
- DOC 8 Draft Interim Planning Policy -Affordable Housing (August 2003).
- DOC 9. Rural Housing Trust Needs Survey 2005 Peasenhall and Sibton
- DOC 10 Adopted Supplementary Planning Guidance - Affordable Housing (July 2004)
- DOC 11 Suffolk Coastal Local Plan First Alteration (February 2001)
- DOC 12 Issues Report - A Vision of the District (October 2002)
- DOC 13 Response to Issues Report "A Vision of the District"
- DOC 14 Suffolk Structure Plan (June 2001).
- DOC 15 Regional Planning Guidance for East Anglia (November 2000).
- DOC 16 Draft Regional Spatial Strategy - The East of England Plan (December 2004)
- DOC 17 Local Plans and Unitary Development Plans - A Guide to Procedures (1999)
- DOC 18 Suffolk Coastal Community Strategy
- DOC 19 Planning Policy Guidance Note 3 - Housing.

- DOC 20 Sustainable Communities: Building for the Future (ODPM 2003)
- DOC 21 David Couttie Associates Housing Needs Study (February 2000)
- DOC 22 David Couttie Associates Supply/Demand Analysis (April 2003)
- DOC 23 Circular 6/98 Planning and Affordable Housing
- DOC 24 Barker Report
- DOC 25 Suffolk Coastal Housing Strategy Statement (June 2004).
- DOC 26 Rural Housing Trust Needs Survey 2002-Framlingham
- DOC 27 Rural Housing Trust Needs Survey 2003-Grundisburgh
- DOC 28 Rural Housing Trust Needs Survey 2002-Snape
- DOC 29 Rural Housing Trust Needs Survey 2002-Walberswick
- DOC 30 Rural Housing Trust Needs Survey 2002-Wenhaston
- DOC 31 Rural Housing Trust Needs Survey 2002-Yoxford
- DOC 32 Rural Housing Enabler Needs Survey 2004-Campsea Ash
- DOC 33 Rural Housing Enabler Needs Survey 2004-Bramfield
- DOC 34. Rural Housing Enabler Needs Survey 2004-Parham
- DOC 35 Rural Housing Enabler Needs Survey 2003-Orford
- DOC 36 Rural Housing Enabler Needs Survey 2004-Sudbourne
- DOC 37 Rural Housing Enabler Needs Survey 2004-Ufford
- DOC 38 Rural Housing Enabler Needs Survey 2004-Waldringfield
- DOC 39 Rural Housing Enabler Needs Survey 2004-Wickham Market
- DOC 40. Hastoe Housing Association Housing Needs Survey 2002-Kirton and Falkenham
- DOC 41 Capital Expenditure on Housing Enabling Summary
- DOC 42 Suffolk Coastal Empty Property Strategy 1996
- DOC 43 Suffolk Coastal Homelessness Strategy 2003
- DOC 44 Suffolk Coastal Private Sector House Condition Survey 1997
- DOC 45 PPG3 Update "Planning for Sustainable Communities in Rural Areas" (2005)
- DOC 46 ODPM Consultation Paper "Planning for Mixed Communities" (2005)
- DOC 47 "Areas of Outstanding Natural Beauty - a Guide for AONB Partnership Members" (Countryside Agency) (2001)
- DOC 48 Suffolk Coast and Heaths AONB Management Strategy (2002)
- DOC 49 Rural Housing Enabler Needs Survey 2005-Nacton and Levington
- DOC 50 Suffolk Coastal DC Opening Statement
- DOC 51 House Price Index November 2004 – Parliament Today
- DOC 52 House Price Index January 2005 – Parliament Today
- DOC 53 Can't work, can't buy – Joseph Roundtree Foundation
- DOC 54 Affordability differences by area- October 2004 - Joseph Roundtree Foundation

SUFFOLK COASTAL LOCAL PLAN SECOND ALTERATION

Response by Suffolk Coastal District Council to the Inspector's Report of the Public Local Inquiry of 15th March 2005

Policy	Subject	Paragraph in Inspector's Report	District Council Response	Action
AP37A	General	1.1	Accept the Inspector's reasoning and conclusions as sound.	No Modification.
AP37A	Exception Sites in Towns	1.2	Not to accept the Inspector's reasoning and conclusions as sound (see Part 4).	No Modification
AP37A	Settlements in the AONB	1.3	Accept the Inspector's reasoning and conclusions as sound.	No Modification.
AP37A	Implementation Mechanisms	1.4	Accept the Inspector's reasoning and conclusions as sound.	Modification M1 (see Part 3).
AP37A	Miscellaneous	1.5	Accept the Inspector's reasoning and conclusions as sound.	No Modification.
AP38A	Rate of 1 in 3	2.1	Accept the Inspector's reasoning and conclusions as sound.	No Modification.
AP38A	Thresholds	2.2	Not to Accept the Inspector's reasoning, conclusions and recommendation (see Part 4).	No Modification.
AP38A	Flexibility	2.3	Accept the Inspector's reasoning and conclusions as sound.	No Modification.
General	Low Cost Homes	2.4	Accept the Inspector's reasoning and conclusions as sound.	Modifications 2, 3 and 4 (see Part 3).
General	Miscellaneous Issues	2.5	Accept the Inspector's reasoning and conclusions as sound.	No Modifications.

SUFFOLK COASTAL LOCAL PLAN SECOND ALTERATION

PROPOSED MODIFICATIONS

REFERENCE NUMBER	POLICY	MODIFICATION	REASON FOR A MODIFICATION
M1	AP37A	Delete the words “developed by a Registered Social Landlord and” from Policy AP37A.	Recommended by the inspector
M2	AP37A	Add the following footnote to Policy AP37A: “Affordable housing is as defined in paragraph 23”	Recommended by the inspector
M3	AP38A	Add the following footnote to Policy AP38A: “Footnote: Affordable housing is as defined in paragraph 23”	Recommended by the inspector
M4	General	Delete paragraph 23 of the supporting text and replace with the following: “To summarise, the priority component of affordable housing in Suffolk Coastal is considered to be: <ul style="list-style-type: none"> □ Social housing, which will consist of: <ul style="list-style-type: none"> • Housing for rent, and • Shared ownership/equity housing It will be sought through policy AP37 (exception sites) and AP38 (as a proportion of new developments). A second component of affordable housing, namely: <ul style="list-style-type: none"> □ Low cost (unsubsidised) market housing will not be the subject of these policies. This is primarily expected to consist of small units of accommodation and be achieved through policy AP36.”	Recommended by the inspector

SUFFOLK COASTAL LOCAL PLAN SECOND ALTERATION

THE LACK OF MODIFICATIONS IN RESPONSE TO THE INSPECTOR'S RECOMMENDATIONS

REFERENCE NUMBER	POLICY	REASONS FOR LACK OF A MODIFICATION
L1	AP37A	<p>The District Council does not accept the following recommendation 1.2 of the Inspector:</p> <p style="text-align: center;"><i>“Modify the Plan by deleting Woodbridge, including Melton, from the list of settlements to which the policy applies.”</i></p> <p>Its reasons are as follows:</p> <ol style="list-style-type: none"> <li data-bbox="544 813 1342 1279">1 The Inspector has paid insufficient regard to the nature of Woodbridge and its needs. At the public inquiry the Council argued that the opportunities for affordable housing as part of larger developments would be infrequent. The town is tightly compact with little development potential. However, exception sites on the edge of, but outside the physical limits, offer affordable housing opportunity. The inspector's dismissal of this argument is based on what can only have been a cursory visit and examination of the town. This is confirmed by his own phrase “from my visit to the town I <i>find it hard to imagine</i> that no residential development sites will come forward within the plan period.” <li data-bbox="544 1339 1310 1536">2 His recommendation on such an important subject should be based on an examination of the factual evidence and not mere speculation. It is, therefore, flawed and for this reason the District Council does not accept the recommendation in paragraph 1.2 of the Inspector's Report
L2	AP38A	<p>The District Council does not accept the following recommendation 2.2 of the Inspector:</p> <p style="text-align: center;"><i>“Modify the Plan in the bullet points of Policy AP38A by replacing six with fifteen and three with nine.”</i></p> <p>Its reasons are as follows:</p> <ol style="list-style-type: none"> <li data-bbox="544 1888 1350 2049">1 In paragraph 2.2.3 the Inspector recognises that the Council's Housing Needs Survey shows evidence of clear needs and a potential shortage of supply outside the main urban areas. He argues that in the last five years there has been a “significant” supply of

		<p>affordable housing as part of larger developments. The figure put to him at the Inquiry was 40 units (or 8 per annum) mostly on the edge of Ipswich. Such a statistic is not sufficient to be called “significant” given the quantity of need.</p>
	2	<p>The Council’s revised policy threshold would yield “only” 20 or so more units each year. The Council questions the use of the word “only” and points out that this figure relates to towns. There would also be increased provision in villages.</p>
	3	<p>In paragraph 2.2.4 the Inspector takes the opinion that the requirements in Suffolk Coastal are not substantially greater than anywhere else in the county. This is not a valid argument against the Council attempting to meet its needs. It is also based largely on one set of statistics on house prices relative to incomes. These were from a survey by the Joseph Rowntree Foundation. The statistics were quoted at the one day Inquiry by one of the objectors, giving the Council no time to respond.</p>
	4	<p>Such a survey gives a view of the district as a whole and not conditions in the various parts. The gap between house prices and average earnings continues to increase.</p>
	5	<p>There is inconsistency in the Inspector’s reasoning. In paragraph 1.1.6 he recognises the widening gap between house prices and average income and speculates on an increase in the need for affordable housing. Such an accepted situation is then given little weight following a narrow comparison with the rest of the county and the region.</p>
	6	<p>In paragraphs 2.2.4 and 2.2.5 the Inspector makes reference to the potential source of affordable housing through “exception sites”. This, he argues, should address the particular needs in villages. However, this is contradicted in paragraph 2.5.1 by a statement that such potential is likely to be “a small amount,” with the majority of affordable housing likely to be built within town and village boundaries.</p>
	7	<p>In paragraph 2.2.5 and the recommendation a threshold of nine units is proposed in villages. There is no justification as to why this particular figure has been chosen. The Council cannot proceed with a modified policy for which it has no justification.</p>
	8	<p>A threshold of nine units is also inconsistent with the remainder of the Local Plan. Policy AP27 states that residential development in villages will normally take the form of either infilling or a group of dwellings. The latter is defined in paragraph 3.5 of the Local Plan as consisting of no more than five dwellings. A development of nine units, therefore, would be</p>

		<p>contrary to the Local Plan.</p> <p>9 The government currently promotes the role of affordable housing in mixed and sustainable communities. The achievement of such housing through the planning process is also the subject of potential changes to national policy. In a Consultation Paper in January 2005 on proposed changes to PPG 3 Housing, called "Planning for Mixed Communities" it is stated:</p> <p><i>The minimum site-size threshold above which affordable housing is to be sought should not normally be above 15 dwellings or sites of more than 0.5 hectares. A local planning authority may adopt a different site-size threshold for the plan area or different thresholds (for example different site-size thresholds for different parts of the plan area or a range of site-size thresholds in conjunction with differential affordable housing contributions). A local planning authority may wish to set its minimum site-size threshold lower than 15 dwellings or 0.5 hectares where it has high levels of need which cannot be met on larger sites alone and / or where the majority of housing supply comes from smaller sites.</i></p> <p>10 For the above reasons the District Council does not accept the recommendations in paragraph 2.2 of the Inspector's Report.</p>
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SUFFOLK COASTAL LOCAL PLAN SECOND ALTERATION – AFFORDABLE HOUSING

**PARAGRAPHS 3.49 TO 3.57, INCLUDING POLICIES AP37 AND AP38, WILL BE DELETED
AND REPLACED WITH THE FOLLOWING**

THE NEED IN THE DISTRICT

1. “Affordable Housing” is defined in Circular 06/98 as “both low cost market and subsidised housing (irrespective of tenure, ownership – whether exclusive or shared – or financial arrangements) that will be available to people who cannot afford to rent or buy houses generally available on the open market”.
2. In December 1999 Suffolk Coastal District Council commissioned a detailed District-wide housing needs survey - an assessment and projection of housing need as the basic building block in informing housing, planning and care strategies for the future. The District Council also commissioned further analysis of the results, comparing the Housing Needs Survey with size, type and tenure of the existing dwelling stock.
3. The total need for subsidised affordable housing for the period 2000 to 2005 is predicted to be 884 units annually. Re-lets of the existing social stock average 400 units per annum and will be the major means of addressing the scale of need identified. On balance there will still be a need for 484 new units annually.
4. In addition, there is a need for unsubsidised low cost market housing and planning policies and site development briefs should continue to encourage more smaller dwellings to meet current needs. A target of 450 units overall was recommended.
5. The total requirement for affordable housing is extremely high in relation to the number of dwellings built per annum in total. However, the Council desires to achieve as many affordable houses on as many sites as possible.
6. The research, therefore, shows that the provision of two forms of affordable housing has to be a priority given the predicted annual increase in need.
7. The first form consists of smaller units of accommodation provided as part of a range of house type and size. Such accommodation is more affordable as a result of being smaller, and contributes to the needs of first-time buyers in the district. A subsidy on such accommodation is not necessary. Policy AP36 will be used to seek such a provision.
8. The second form is often referred to as “social housing” and this can be broken down into two elements:
 - (a) The provision of rented accommodation. This will be important in the Suffolk Coastal District given that 75% of households expected to form within the next five years would struggle to access the local housing market.
 - (b) Shared equity or shared ownership social housing. The aspiration towards home ownership is high and this can be assisted by shared equity which represents an opportunity to own a proportion of the housing unit and, perhaps,

through “stair-casing” have the opportunity to purchase the remaining proportion. This is considered to be extremely important as it represents the chance to step on the property ladder and, eventually, achieve home ownership.

- 9 A social housing agency, otherwise known as a Registered Social Landlord (RSL) and usually a housing association, controls social housing. This has the advantage of ensuring that the units are available for occupation in perpetuity by those in local need.
- 10 The two means by which social housing can be achieved through the planning system – as exceptions to normal planning policy and as a proportion of housing development – are considered in the next sections. Proposals will also be considered against the Council’s adopted Supplementary Planning Guidance.

Exception Sites

- 11 It is Government policy that in future, local authorities should be the “enablers” rather than the “providers” of accommodation for those not able to access open market housing. The providers are normally likely to be social housing agencies such as housing associations. One recognised method of achieving affordable housing, with controls in respect of such matters as occupancy, is the development of land normally subject to restraint, such as outside the defined physical limits boundaries. In such cases, the District Council will only allow development as an exception to normal policies where it is for affordable housing.
- 12 Housing need is increasing and supply, within towns as well as villages, is not meeting it sufficiently. It is expected, therefore, that with such a proven need for the affordable housing in Suffolk Coastal, and no means of achieving it within the defined physical limits, then exceptions admitted under Policy AP37 should equally apply to market towns as well as villages. Such towns are Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge. They do not include Felixstowe and those parts of the Parishes of Kesgrave, Purdis Farm, Martlesham and Rushmere St Andrew that are within the defined Town area. Here, there should be sufficient opportunities within the physical limits to identify suitable sites.
- 13 Policy AP37 will, therefore, read as follows:-

POLICY AP37A

Affordable Housing in Suffolk Coastal on Exception Sites

Exceptionally, the District Council may be prepared to permit a small residential development in order to meet a particular local need for affordable housing for those whose incomes are too low to buy in the open market, and for whom there is insufficient rented accommodation which cannot be provided in any other way, on a site which abuts or is well-related to the physical limits boundary of a market Town or Village, subject to the following criteria:

Any proposal will be considered in relation to the scale and character of the town or village, availability of services and facilities, highway safety, effect on the surrounding countryside and residential amenity. Proposals likely to set a precedent for ribbon development on the edge of towns or villages will be resisted.

The local need for affordable housing shall first have been quantified within an area to be agreed by the District Council.

The site shall be subject to a Legal Agreement with the District Council, which provides for permanent control and management to ensure the retention of proposals for local need.

Footnotes:

"Market towns" are Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge with part of Melton.

Affordable housing is as defined in paragraph 23

- 14 It must be emphasised that, in adopting this policy, the District Council will not consider proposals for speculative housing, even though they may contain an element of affordable units. Such proposals will continue to be judged against the normal housing policies set out in this plan.

Affordable Housing in Suffolk Coastal as Part of Other Residential Developments

- 15 PPG3, Circular 6/98 and Policy AP38 make it clear that the District Council can require affordable housing as a part of suitable housing developments. Site size thresholds, before this requirement come into play, are set out in the Circular although it can be varied where the size and circumstances of the settlement indicate a lower threshold.
- 16 The circumstance prevalent in respect of this District is that of few opportunities whereby planning permission is granted for developments of the sizes referred to in the Circular. Although large scale developments may be taking place or have planning permission now, the Council cannot apply a policy retrospectively. Looking to the future, therefore, the Council must apply a significantly lower threshold if it is to meet its affordable housing needs in Suffolk Coastal.
- 17 Therefore, within this District, it is expected that for the following reasons the threshold in respect of eligible settlements will be significantly below that advocated in Circular 6/98:
- Since the adoption of the Local Plan the Council has had the benefit of a Housing Needs Survey and ancillary analysis.
 - A considerable proportion of housing developments which will take place in the next five years already have the benefit of planning permission, and requirements for affordable housing cannot be applied retrospectively.
 - Only one site allocated in the Local Plan for residential development and suitable for a proportion of affordable housing, does not have planning permission.
 - If the past five years is representative, a significant proportion of new planning consents for housing in villages will be granted on small, unidentified sites
 - Even in towns, developments on large sites will be infrequent
 - Other circumstances may include the fact that exception sites (Policy AP37) may not be appropriate due to the sensitive landscape setting of some settlements.
 - Suffolk Coastal has experience of high (and increasing) house prices. There is a clear gap between the cost of property and the ability of many local people to purchase it.

- Market rents are also high and above the affordable level of those in need of social housing.

18 Therefore, within all settlements (other than where there is a lack of identified need), the threshold is to be:

- **Three units** in settlements classed as **Villages**; and
- **Six units** in settlements classed as **Towns**.

19 At or above this figure an appropriate proportion of affordable housing units will be expected and the survey results point towards achieving **1 in 3 affordable housing units in Suffolk Coastal** from the total of all suitable sites coming forward for planning consent. However, each site will need to be assessed individually, targets being subject to wider planning, economic priority, viability and sustainability considerations.

20 This will result in the following:

1-2	units	-	0 units of affordable housing (villages only)
3-5	units	-	1 unit
6-8	units	-	2 units (villages and towns)
9-11	units	-	3 units
12-14	units	-	4 units
15-17	units	-	5 units
			etc

21 The Council's priority will be to see affordable housing being provided on site in order to contribute to the creation of balanced communities. However, it accepts that on certain sites, as a last resort, it may not be appropriate for affordable housing to be sought or provided. In such cases the District Council will expect appropriate financial contributions to be made towards the provision of affordable housing on different sites within the District (but within the same defined local need area) which is considered suitable for affordable housing.

22 Policy AP38 will, therefore read:

POLICY AP38A

Affordable Housing in Suffolk Coastal on Residential Sites

In considering planning applications for the development of:

- **six or more housing units in Towns and**
- **three or more units in Villages**

whether in total or in phases, the District Council will expect 1 in 3 units to be affordable housing unless its provision is not required due to:

- (a) Lack of identified local need in the area.**
- (b) Site conditions, suitability and economics of provision.**
- (c) The proximity of local services and facilities, as well as suitable access by public transport to a town or service centre.**

(d) Whether the provision of affordable housing would prejudice the realisation of other planning objectives.

The District Council will need to be satisfied as to the adequacy of arrangements to ensure that houses are offered to local people, who can demonstrate need, at a price which they can afford and that its enjoyment is by successive, as well as initial, occupiers.

Where the District Council and the developer consider that a site is not suitable to accommodate an element of affordable housing, the District Council will expect a financial or other contribution towards the provision of affordable housing on a different site within the same area.

Footnote:

Affordable housing is as defined in paragraph 23

23 To summarise, the priority component of affordable housing in Suffolk Coastal is considered to be:

- Social housing, which will consist of:
 - Housing for rent, and
 - Shared ownership/equity housing

It will be sought through policy AP37 (exception sites) and AP38 (as a proportion of new developments).

A second component of affordable housing will not be the subject of these policies, namely:

- Low cost (unsubsidised) market housing

This is primarily expected to consist of small units of accommodation and be achieved through policy AP36.