

# 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.

This document represents the Second Alteration and deals specifically with affordable housing.

The period in which to submit representations of objection or support expires on June 26<sup>th</sup> 2004. These must be submitted on forms, which are available:

- from the address below
- by telephoning (01394) 444291
- by e-mailing [julie.holmes@suffolkcoastal.gov.uk](mailto:julie.holmes@suffolkcoastal.gov.uk)
- from the Council's web site [www.suffolkcoastal.gov.uk](http://www.suffolkcoastal.gov.uk)

Representations received in any other form, or after the date specified will not be accepted. Representations on any other policy or subject will also be unacceptable.

In submitting a representation please indicate clearly:

- the paragraph or policy concerned
- the change which is required

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

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May 2004

## **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 developed by a Registered Social Landlord and 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.**

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

- 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.**

23 To summarise, affordable housing in Suffolk Coastal comprises:

- Low cost (unsubsidised) market housing - this will consist of small units of accommodation and be achieved through policy AP36;
- Social housing - this will consist of:
  - Housing for rent, and
  - Shared equity housing

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

## APPENDIX

This Appendix contains, for comparison purposes, the existing text of the Suffolk Coastal Local Plan First Alteration, paragraphs 3.49 to 3.57 and Policies AP37 and AP38.

In addition, it contains, for information, Policy AP36 and supporting paragraphs 3.47 and 3.48. Please note that these are not proposed to be altered.

The full Local Plan First Alteration can be read at the Council's offices within Woodbridge, in libraries within the district, and on the Council's website [www.suffolkcoastal.gov.uk](http://www.suffolkcoastal.gov.uk).

## **AFFORDABLE HOUSING**

- 3.47 *It has become increasingly evident over recent years that many of the houses now being built in the District are beyond the financial reach of many local people. This, coupled with the decreasing stock of public sector housing as tenants exercise their 'right to buy', has meant that there are also fewer properties available to rent for local residents. There may also be a lack of suitable accommodation for the elderly and people with disabilities.*
- 3.48 *One way of achieving affordable housing is through the construction of an appropriate range of housing. The District Council will therefore expect any new housing development on a substantial scale, in both urban and rural areas, to incorporate a reasonable mix and balance of house types and sizes to cater for a range of housing needs.*

### **POLICY AP36**

#### **House Type and Size**

***In considering applications for housing development, the District Council will seek to ensure, in conjunction with the building industry, that a wide range of type and size of houses is provided to cater for the needs of different social and economic groups and to avoid undue uniformity.***

- 3.49 'Affordable Housing' is defined as:
- a) *housing which is provided for sale or rent by social housing agencies, housing co-operatives or their equivalent to meet local needs; or*
  - b) *housing which is sold or rented on the open market, but is 'low cost' by virtue of:*
    - i) *its size, type, design or density; and*
    - ii) *its availability at a price which enables it to be occupied by local people in housing need.*

#### **Exceptions to Housing Policies**

- 3.50 *It is Government policy that in future, Local Authorities should be the 'enablers' rather than the 'providers' of less expensive accommodation, which will normally be provided by social housing agencies. In order that a housing association can make housing available at an affordable level, it depends in the first instance on it being able to acquire the land at below normal residential land value. The allocation of land for housing in a Local Plan immediately enhances its value to such an extent that it no longer becomes financially viable for use for a local need housing scheme. Therefore, unless land within villages is made available at a subsidised, below-market price, local need housing in villages must be provided on sites which are outside the defined physical limits boundaries, in order that the land has a considerably reduced value. The District Council will only allow such development as an exception where it is for a defined need, subject to controls on occupancy, and immediately abutting physical limits boundaries.*

**POLICY AP37**  
**Affordable Housing**

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

- (i) any proposal will be considered in relation to the scale and character of a village, the 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 villages will be resisted;***
- (ii) the local need for housing shall first have been quantified within an area to be agreed by the District Council;***
- (iii) the site shall be developed by a social need housing agency and subject to a legal agreement with the District Council, which provides for permanent controls and management to ensure the retention of proposals for local need.***

*Proposals will be considered against the Council's adopted Supplementary Planning Guidance.*

- 3.51 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 low cost units. Such proposals will continue to be judged against the normal housing policies set out in this Plan.***
- 3.52 It is anticipated that the flexibility and the ability to develop beyond the physical limits boundary, as defined on the Proposals Map, will not normally be appropriate in the Towns. This is because there is already likely to be a range of accommodation, including some for rent or capable of purchase by first-time buyers. The need to go beyond the physical limits boundary, thereby prejudicing the overall policy of restraint, is not so acute as it would be in a Village. Also, the scale of need in a Town is likely to be such that it could result in a large site being pursued for development, to the detriment of the character and setting of the particular Town.***

**Affordable Housing on Larger Sites**

- 3.53 Where land is allocated for residential development in the Local Plan or other large windfall sites are developed, the District Council will expect a percentage of the new dwellings to be affordable. This can be achieved by the developer giving the land (at no cost) to a social housing agency (eg Housing Association). In respect of land, the agency can then develop it when resources permit, but within a reasonable period of time.***

- 3.54 *The District Council accepts that on certain sites, 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 are considered suitable for an element of affordable housing.*
- 3.55 *Circular 6/98 lays down the thresholds above which the District Council can require a developer to provide an element of affordable housing; conversely, the District Council cannot require affordable housing below these thresholds. These thresholds are 40 or more dwellings or sites of 1.5 hectares or more in settlements with a population of over 3,000; or 25 or more dwellings or sites of 1 hectare or more in settlements with a population of 3,000 or fewer.*
- 3.56 *It is Government policy that one of the criteria for requiring or approving affordable housing is that there should be a proven local housing need in the area. It is also important that the need calculation or survey is relatively up to date, so can be relied upon. Since planning applications for sites in accordance with AP37 are as exceptions to the normal Village housing policy, the District Council will expect proposed developers (ie social housing agencies) to carry out their own Local Need survey, in order to support their applications.*
- 3.57 *With regard to the estimate of the number of affordable houses which will be required under Policy AP38, the housing needs survey caught enough households in the urban areas for the responses to be meaningful, so will be used as an indicator. The survey results show a significant need for further affordable housing in Aldeburgh, Felixstowe, Framlingham, Leiston, Saxmundham, Woodbridge and the Ipswich Fringe parishes of Kesgrave, Purdis Farm, Martlesham and Rushmere St Andrew. The District Council has carried out a more precise examination of need, which updates the results of the 1995 survey and takes account of local house prices and rents, local income and the suitability of existing local housing. Revised figures for the number of affordable houses to be provided on any site will be set out in Supplementary Planning Guidance.*

**POLICY AP38**  
**Affordable Housing on Large Sites**

***In considering planning applications for the development of:***

- a) 25 or more dwellings or residential sites of 1 hectare or more in settlements with a population of over 3,000; or***
- b) 15 or more dwellings or residential sites of 0.5 of a hectare or more in settlements with a population of 3,000 or fewer, unless the size and circumstances of the settlement indicate a lower threshold;***

*whether in total or in phases, the District Council will expect an appropriate proportion of affordable housing unless its provision is not required due to:*

- i) lack of identified local need in the area;***
- ii) site conditions, suitability and economics of provision;***

- iii) the proximity of local services and facilities and access to public transport;**
- iv) 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, in the case of rented accommodation, that its enjoyment is by successive, as well as initial, occupiers.***

***Where the District Council or the developer accept or 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 Local Needs area.***

Source: Suffolk Coastal Local Plan (First Alteration) 2001.