

**SUFFOLK COASTAL LOCAL PLAN  
SECOND ALTERATION**

**AFFORDABLE HOUSING**

**STATEMENT OF PUBLICITY AND CONSULTATION**

**May 2004**

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# SUFFOLK COASTAL LOCAL PLAN SECOND ALTERATION

## STATEMENT OF PUBLICITY AND CONSULTATION

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### Introduction - the Suffolk Coastal Local Plan

The Suffolk Coastal Local Plan was adopted in December 1994. A First Alteration was adopted in February 2001. This guides and controls development in the District for the period to 2006.

The District Council resolved to carry out the second review the Suffolk Coastal Local Plan on 23<sup>rd</sup> October 2001. This was to represent a complete re-examination of the document to conclude with a replacement plan in the local development framework format and not just an update of the existing one.

In respect of the Local Plan review two major exercises have occurred in respect of public participation and consultation. The first was a series of workshops in late Spring 2002. These were extensive in scope and revolved around stakeholder groups - agents, community groups, business organisations, environmental groups, councillors and local councils - and themes. One theme was housing and a workshop took place on April 15 2002. It involved town/parish councils, voluntary groups, housing providers, and house builders.

There were thirteen workshops in all. One topic that arose consistently was affordable housing.

The outcome of the workshops was the identification of issues and their publication in the form of a newsletter – “a Vision of the District”. This was sent in October 2002 to every household in the District, as well as other organisations. One issue was affordable housing, with the question asked:

*How can low cost housing be achieved and, in the case of housing for purchase, how can the benefits be passed on to subsequent purchasers?  
The following are possible methods - what are your views and are there others?*

- i. Greater proportions of low cost housing in new developments*
- ii. A proportion of low cost housing in all developments, regardless of size*
- iii. Allowing exceptions to normal policies in order to allow low cost housing outside the envelopes of towns rather than just villages as at present*
- iv. Allowing exceptions to normal policies in order to allow low cost housing outside, but not necessarily abutting, the envelopes of villages as at present*
- v. Financial contributions from all housing development*
- vi. Large scale releases of land for housing development*
- vii. Phased small releases of land*
- viii. By other means?*

A total of 117 responses were received to this question. It will be noted that there was considerable support for the need to address the issue and, of the options put forward, many supported (iv) and exceptions outside the boundaries of town as well as village envelopes.

## **Consultation on Draft Proposals**

The public response to the second review of the Local Plan emphasised the Council's increasing awareness that many people who wish to enter the housing market within Suffolk Coastal cannot do so because their financial resources and incomes are below that necessary to purchase or rent the lowest priced housing available.

The current First Alteration to the Local Plan contains policies – AP37 and AP38 - that seek to address this issue. On the 29<sup>th</sup> July 2003 (Paper CAB37/03) the Council's Cabinet agreed to publish for consultation draft Supplementary Planning Guidance. This set out more detailed advice and guidance on the way in which the policies would be applied in particular circumstances or areas.

At the same time, the Council's Cabinet also agreed, again for consultation, draft changes to the two Local Plan policies on affordable housing. Further, the Council proposed that, following consultation, it would adopt these changes as interim planning policy in order to enable them to be used in the determination of planning applications. The Council was not prepared to wait for the conclusion of the second review of the Local Plan for more effective policies on affordable housing.

On 21<sup>st</sup> August there commenced an extensive public consultation exercise on the Draft Supplementary Planning Guidance and Draft Interim Planning Policies. This lasted until October 23<sup>rd</sup> 2003. Copies of the document were sent, with an invitation to comment to:

- a) all town and parish councils in the district;
- b) numerous amenity groups, residents' associations and other local organisations with an interest in the subject;
- c) local business groups;
- d) the county council and county councillors in the district;
- e) all housing associations operating in the district;
- f) agents, developers and house builders considered to be prolific in the district;
- g) the Government Office for the Eastern Region.

The consultation exercise was also the subject of a press release and an article in "Coastline". This is a newsletter published on a quarterly basis and distributed to every address within the District. Both documents were also placed on the Council's website.

In addition, the Cabinet sought the views of the Council's Development Control Committee, Policy & Development Review Committee, Replacement Local Plan Task Group and Housing Provision & Availability Task Group (of which a meeting could not unfortunately be arranged).

All those who were invited to comment are listed in Appendix A to this statement. The substance of the comments received, together with the Council's response, is set out in Appendix B. The views of the Council's own Committees and Task Group are also set out in Appendix C.

## **The Community Strategy for Suffolk Coastal**

The issue of affordable housing has also been discussed by the Suffolk Coastal Local Strategic Partnership and addressed in the Community Strategy for the Suffolk Coastal District. The provision of additional affordable housing is a priority of the Partnership and this is reflected in the Community Strategy Action Plan, which contains the two following policies.

Policy HOUS1 is to increase the stock of social rented and low cost housing to meet local needs. Two targets are:

- a) the provision of no less than 40 new social rented or shared ownership dwellings per year on infill or brownfield sites in the south of the district;

- b) to define in the new replacement Local Plan, policies that would meet new requirements identified in the Housing Needs Survey for each part of the District.

Policy HOUS3 is to increase and maintain the stock of small housing units. The target is to define by December 2003, following consultation with the house building industry, levels of smaller dwellings to be achieved over the next 10 years. Such consultation involves the creation of a forum with the house building industry to share information, carry out joint research on the housing market and explore imaginative and creative approaches to providing small units of accommodation. Such a forum has been established within Suffolk Coastal.

### **Response to Consultation**

Following consideration of the responses to the consultation exercise on Draft Supplementary Planning Guidance and Draft Interim Planning Policies, and having regard to the Community Strategy for Suffolk Coastal, the Council's Cabinet on 2<sup>nd</sup> March 2004 (paper CAB 22/04) resolved:

- a) to proceed with the changes to the two Local Plan policies, but in the form of a Second Alteration to the Local Plan rather than Interim Planning Policy; and
- b) to proceed with the preparation of Supplementary Planning Guidance, supplementary to the existing Local Plan policies.

At a meeting of the Council on 22<sup>nd</sup> March 2004 (Paper CL 07/04), resolution (a) above was confirmed. The Second Alteration to the Local Plan has now been placed on its first deposit for a six-week period during which representations of support or objection can be made. This Statement of publicity and consultation relates to this Second Alteration.

### **Conformity With the Suffolk Structure Plan 2001**

On the 5<sup>th</sup> May 2004 Suffolk County Council issued a Statement under section 46(2) of the Town and Country Planning Act 1990 (as amended) that the Second Alteration to the Suffolk Coastal Local Plan is not in general conformity with the Suffolk Structure Plan 2001. A copy of the Statement is attached as Appendix D.

# APPENDIX A

## PART 1 – RESPONDENTS

The following submitted comments on the draft SPG and proposed interim planning policies:

Anchor Farms	Kesgrave Town Council
Bellway Homes	L J Ling
Benhall & Sternfield Parish Council	T Lomax
Blake Gorst FRICS	Melton Parish Council
Roger Bullworthy Associates	Merchant Projects
Countryside Agency	Peacock Short
B K Crisp	Saint Matthew Housing
Dunwich Parish Council	Site Preservation Society
Easton Parish Council	Smiths Estate & Land Agents
Equal Opportunities Commission	Suffolk NHS
Felixstowe Society	Suffolk County Council
Felixstowe Town Council	Theberton & Eastbridge Parish Council
GoEast	Walpole Hatch Farm
Gt Glemham Parish Council	R West
S Hawes	Wickham Market Parish Council
Hollesley Parish Council	Woodbridge Society
Housebuilders Federation	Woodbridge Town Council

## PART 2 – NON-RESPONDENTS

The following organisations were invited to comment on the draft SPG and proposed interim policies but did not respond:

All town and parish councils not listed above	Hanover Housing Association
Advisory Council for Education of Romany & Other Travellers	Hastoe Housing Association
Alde & Ore Association	Home Office
Aldeburgh Business Association	Hopkins and Moore Ltd
Aldeburgh Society	Sir Richard Howitt MEP
Ashton Allen Design	IPSENTA
Babergh District Council	Ipswich Borough Council
Bloor Homes	Ipswich Caribbean Association
Bovis Homes Ltd	Landlink PLC
Campaign to Save our Rural Roads	Leiston Business Association
Chater Homes	Michael Lord MP
Civic Trust	Martlesham Heath Neighbourhood Association
Coastal Housing Action Group	Mid-Suffolk District Council
County Councillors in the District	National Farmers Union
Country Land & Business Association	Orbit Housing Association
Defence Land Agent	Orwell Housing Association
DEFRA	Park Road Residents' Association
East of England Development Agency	Stuart Reid
East of England Tourist Board	Rural Housing Trust
East Suffolk Coalition of Disabled People in Action	SALC
English Rural Housing Association	Sanctuary Housing Association
Farming and Rural Conservation Agency	Saxmundham Business Association
Felixstowe Chamber of Trade & Commerce	Shaftsbury Housing Association
Felixstowe Ferry Preservation Society	South Hill Area Residents' Association
Felixstowe Town Centre Residents' Association	Suffolk ACRE
Fielden Ltd	Suffolk Coastal Business Forum
Flagship Housing Group Ltd	Suffolk Heritage Housing Association
Framlingham and District Local History & Preservation Society	Suffolk Police Architectural Liaison Officer
Framlingham Business Association	Trimley Preservation Society
Gujarati Community	Waveney District Council
John Gummer MP	West of Felixstowe Residents' Association
	Wilcon Homes Anglia Ltd
	Woodbridge Chamber of Trade & Commerce



## APPENDIX B

### SUMMARY OF COMMENTS MADE

#### PART ONE: AFFORDABLE HOUSING GENERALLY

Ref	Comments Made	Name	SCDC Response	Proposed Action
1	The SPG should not be used to circumvent statutory planning process, particularly bearing in mind Circular 6/98 and recent ODPM advice and the fact that the Local Plan is under review.	Bellway Homes GoEast HBF Roger Bullworthy Associates	See Section 3 of the Report.	Progress as part of a 2 <sup>nd</sup> Alteration of the Local Plan.
2	Affordable Housing should not be given to the undeserving, lazy and irresponsible. Affordable rates would be more beneficial.	T Lomax	No comment.	None
3	The Council should consider the allocation of land within villages for social housing, perhaps former employment areas.	Wickham Market PC	Allocation is impractical because it is likely to result in landowners holding onto land in the hope that it might have market value one day.	None.
4	In order to retain a stock of small units of accommodation, the expansion of existing small units should be controlled, but advertised well in advance so that buyers are fully aware.	Felixstowe TC Wickham Market PC	Requires consideration as part of the review of the Local Plan in order that registered social landlords maintain the stock in order to meet needs.	Refer to the Replacement Local Plan Member Task Group
5	Affordable units granted planning permission should be the subject of conditions preventing future expansion and change of status.	Hollesley PC Kesgrave TC	Requires consideration as part of the review of the Local Plan.	Refer to the Replacement Local Plan Member Task Group

Ref	Comments Made	Name	SCDC Response	Proposed Action
6	The SPG should recognise the need for small units of accommodation for the elderly wishing to move into communities in order to be near family members or indeed of supported housing schemes. Both for rent, leasehold and shared equity.	Gt Glemham PC Suffolk NHS	The SPG does refer to housing for the elderly. 'Affordable' housing is not only for first time buyers.	None.
7	The Council should consider compulsory purchase powers in order to facilitate the required levels of affordable housing.	Smiths	Compulsory purchase should be considered only as a last resort	Noted.
8	Given the size of the need it is unrealistic to maintain tight physical limits boundaries. The Council needs to be more proactive.	B K Crisp	Requires consideration as part of the review of the Local Plan.	Refer to the Replacement Local Plan Member Task Group.

## PART TWO: POLICY AP37 – EXCEPTION SITES

Ref	Comments Made	Name	SCDC Response	Proposed Action
9	Extending the rural exceptions policy to towns conflicts with PPG3, Circular 6/98 and Policy CS9 of the Structure Plan. All of these link exceptions to villages. A case to extend the concept to towns has not been made sufficiently and, in any event, should be pursued through the LDD process.	SCC	It is considered that there is a case for exceptions in towns, notably Felixstowe. The point about pursuit through the development plan system is valid.	Progress as part of a 2 <sup>nd</sup> Alteration to the Local Plan.
10	Concern over the retention of units for local people and not for sale on the open market.	Hollesley PC Theberton & Eastbrook PC	Affordable units will need to be retained as such in perpetuity with local people having priority. This is made clear in the SPG.	None.
11	The text should be amended to acknowledge that the housing needs survey is de facto evidence of the general need for social housing.	Benhall & Sternfield PC	It is considered to do so already.	None.
12	More thought should be given to the possibility of self-build.	Wickham Market PC	Self-build on exception sites is not considered practical because of the	None.

Ref	Comments Made	Name	SCDC Response	Proposed Action
			problems of controlling sale price and occupation.	
13	Exception sites should also include the conversion of existing farm buildings in the countryside, well-related to a village. Low cost market housing may be preferable to social housing.	Gt Glemham PC	It may be possible to permit exception sites that are well related rather than abutting physical limits. However, they must not be in remote, unsustainable locations.	Consider amending the policy whereby exception sites can be well-related as well as abutting physical limits. Progress as part of a 2 <sup>nd</sup> Alteration to the Local Plan.
14	Policy AP37 should not apply only to sites which abut a physical limits boundary but are closely related, or even in communities without a physical limits boundary.	Countryside Agency Dunwich PC	It is accepted that some villages have few opportunities for exception sites, particularly because of the sensitive nature of their edges. If other sites are to be considered they should be well-related to the core of the village and this should be defined. This is referred to in Section 3 of the Report.	
15	The Parish Council should have access to surveys of need in order to help it formulate its views on particular proposals.	Dunwich PC	Any documents submitted in support of planning applications are usually public.	None.
16	Support for the application of the policy to Felixstowe.	Felixstowe TC	Noted.	None.

### PART THREE: POLICY AP38

Ref	Comments Made	Name	SCDC Response	Proposed Action
17	The proposals have no regard to the practicalities and financial viability (as indicated in Circular 6/98) of development. The Council is interfering in the housing market in a way that is inappropriate:  (a) The proposal amounts to a tax on land and	Blake Gorst B K Crisp Felixstowe TC GoEast HBF Roger Bullworthy	The Council is not introducing a new policy. It is recognised in national policy that it is appropriate to require affordable housing as a proportion of general market housing. The SPG and policy do make reference to the economics of	None.

Ref	Comments Made	Name	SCDC Response	Proposed Action
	<p>development without fully considering its consequences. Landowners and developers will remove land from the market place.</p> <p>(b) Sometimes a sum housing associations can afford to pay does not cover the construction costs. These un-recovered costs are also deducted from land value to maintain the developer's liability margin. If the land price is fixed the development becomes un-viable and does not take place.</p> <p>(c) The costs of affordable housing will be passed on to the private element of any scheme, contributing to a widening gap in house prices between affordable and market units.</p> <p>(d) The Council should meet the need by co-operating with developers as opposed to laying down un-viable policies.</p>	Peacock Short Smiths Merchant Projects	<p>provision as being a valid consideration. Negotiation, co-operation and open-book accounting are expected.</p> <p>A Forum was recently arranged by the Council and consisting of housing providers (registered social landlords and house builders), planning agents and officers of the Council. The point was made that many housebuilders would have purchased land, often to create a land bank, and the introduction of a requirement for affordable housing could affect the economics of a scheme.</p>	
18	Negotiations of viability and 106 Agreements will slow up the planning process.	Merchant Projects	It is hoped that model agreements can be formulated.	None.
19	Distortions in housing provision will result as developers seek to avoid development that breaches the threshold.	B K Crisp	No comment.	None.
20	The need for affordable units per annum is higher than the Structure Plan requirement, suggesting that 100% of all new housing units should be affordable.	Peacock Short	It is agreed that the Housing Needs Survey reflects people's aspirations and is present and substantial. A positive approach needs to be taken to achieve it.	None.

Ref	Comments Made	Name	SCDC Response	Proposed Action
21	Highly critical of any suggestion that there is a "surplus" of property within the area.	Peacock Short	No comment.	None.
22	The policy should not "expect" but "seek" an appropriate proportion of affordable housing, as indicated in Circular 6/98. The amount is to be the subject of negotiation.	Bellway Homes	PPG3 states that an authority should define what it considers to be "affordable" housing and seek to quantify it. Furthermore, para 17 states "where a local planning authority has decided ....that an element of affordable housing should be provided in development of a site, there is a presumption that such housing should be provided as part of the proposed development of the site. Failure to apply this policy could justify the refusal of planning permission."	None.
23	The basis of the SPG and policy change i.e. the housing needs survey, was carried out in 1999 and is out of date.	HBF Bellway Homes	The Survey is still considered to be relevant although it should be reviewed soon.	None.
24	Where a site is not suitable for an element of affordable housing none should be required rather than seeking cash payments, thereby contrary to Circular 6/98.	Roger Bullworthy Associates	As a rule, the Council expects to see affordable housing provided on-site to contribute to the creation of balanced communities. Developers/applicants can propose provision off-site or cash-in-lieu of provision elsewhere. The Council is prepared <b>to consider</b> , not propose, such alternatives. But only as a last resort.	Amend the SPG to stress that provision off-site or cash-in-lieu are last resorts.
25	There are no planning reasons why a site would be unsuitable for social housing thereby justifying cash in lieu of its provision elsewhere.	GoEast	See 24 above.	See 24 above.
26	Affordable housing should be integrated into developments and not in separate locations.	GoEast	See 24 above.	See 24 above.

Ref	Comments Made	Name	SCDC Response	Proposed Action
27	Objection to the implication that low cost market housing will be expected in addition to social housing (para 9.13). The Council is seeking to differentiate one from the other when both are within the Government's definition of affordable housing.	Bellway Homes	The paragraph (9.20) refers to the provision of smaller homes (with no subsidy), which by inference are more affordable. This reflects government objectives of mixed housing developments.	None.
28	The text implies that land is transferred to a RSL for no consideration. This is unreasonable provision of affordable housing which is a matter for negotiation between a developer and a RSL.	Roger Bullworthy Associates	The arrangements are a matter for negotiation.	Amend paragraph 9.20(2) to indicate that the transfer of land shall be agreed between developer and RSL, and on terms which the Council is satisfied will achieve affordable housing.
29	The widespread distribution of social housing will be difficult to manage by RSLs.	B K Crisp	This is not the view of RSLs.	None
30	Flexibility should exist to enable affordable housing of all types, making a contribution to the housing stock but not taxing the developer unduly. Low cost market housing as an alternative should apply to all areas and not just within towns.	Merchant Projects Smiths B K Crisp	The Council considers "social housing" to be in the priority in the District in terms of affordable housing.	None.
31	In some cases the ratio of 1 in 3 should be higher. Therefore it should be expressed as a minimum requirement. One suggestion made of 50%.	Gt Glemham PC Hollesey PC Suffolk Preservation Society	The ratio reflects the recommendation within the Housing Needs Survey Report.	None.
32	The units created should be for local people and not be second homes.	Hollesey PC	Occupation will be controlled.	None.
33	The text should make it more clear that all forms of	Suffolk Preservation	Paragraphs 9.22 to 9.24 are considered	None.

Ref	Comments Made	Name	SCDC Response	Proposed Action
	affordable housing should be fully integrated into the layout and design of residential development.	Society	to cover this point adequately.	
34	Criterion (iii) of Policy AP38 should be deleted as many settlements do not have access to public transport and will be prevented from achieving affordable housing.	Dunwich PC	The criterion requires qualification.	Amend Policy AP38 to qualify the phrase "access to public transport."
35	Affordable housing can be achieved by conditions and not just legal agreement. Suggest the wording "no more than 50% of the general market dwellings shall be occupied until the affordable housing element of X dwellings has been built and transferred to a registered social landlord."	Roger Bullworthy Associates	The policy objective is affordable housing for local people in perpetuity, and not just for the first occupants. This cannot be achieved by condition but by legal agreement.	None.
36	The reduction in the threshold to 3 units is welcomed, 15 being unrealistic in smaller communities.	Wickham Market PC	Noted.	None.
37	Support for the threshold and proportion in one case giving examples of how family members having difficulty finding accommodation.	S Hawes Kesgrave TC Easton PC Woodbridge Society	Noted.	None.
38	Support for the policy but too late in the day in Melton where opportunities have been missed and little land remains.	Melton PC	Noted.	None.

#### PART FOUR: SPECIFIC SITES AND AREAS IN RESPECT OF POLICY AP37

Ref	Comments Made	Name	SCDC Response	Proposed Action
39	Sites suggested adjacent to Walpole physical limits boundary.	Walpole Hatch Farm	The SPG does not allocate sites. A matter for the owner/developer to submit a planning application if considered consistent with policy.	None.

40	Objection to the policy if it justifies the development of Trimley St Martin and Trimley St Mary as proposed by Trinity College.	R West	Noted.	None.
41	Suggestion of Valley Road, Leiston.	L J Ling	See 39 above	None.
42	Suggestions (sites unspecified) in Leiston or Saxmundham.	St Matthew Housing	See 39 above	None.
42	Suggests land at Iken adjacent to the village hall.	Anchor Farms	Iken is not a village with physical limits.	None
43	Physical limits boundary of Woodbridge should be retained to prevent it merging with adjoining parishes.	Woodbridge TC	See 39 above	None.

## APPENDIX C

### IEWS OF DISTRICT COUNCIL COMMITTEES AND TASK GROUP

Committee / Task Group	Resolution	Proposed Response	Proposed Action
Policy and Development Review Committee 11 September 2003	<ol style="list-style-type: none"> <li>1. That Cabinet be advised that this Committee endorses both the content of the Supplementary Planning Guidance and the changes to Policies AP37 and AP38 and recommends their use for the purposes of development control, subject to Cabinet being requested to review the requirement for 30% affordable housing, as it relates to smaller developments.</li> <li>2. That Cabinet be requested to consider adopting a sliding scale for the percentage provision of affordable housing within residential developments so that the larger the development the larger the percentage of affordable housing is required.</li> <li>3. That Cabinet be requested to investigate if more land can be made available for the provision of affordable housing through planning consents.</li> </ol>	<p>The proportion of 30% is recommended in the Housing Needs Survey. It applies across the district and to all developments above a certain size. To vary the proportion according to the size of development may not achieve the assumed objective of creating more affordable units. The majority of planning applications are small in size. Very few applications are large (hence the proposal in the SPG to reduce the threshold to 3 units). The variation in proportion also discriminates against the volume builder.</p> <p>It is difficult to envisage how other land can practically be made available for affordable housing. The SPG already provides for social housing and low cost market housing as part of mixed schemes.</p>	None.
Development Control Committee 1 October 2003	That the Committee endorses both the content of the Supplementary Planning Guidance and the changes to Policies AP37 and AP38 and recommends their use for the purposes of the development control subject to the following comments:		

Committee / Task Group	Resolution	Proposed Response	Proposed Action
	<p>1) that in AP37 the word “abuts” be deleted and replaced with “is well related”</p> <p>2) that the figure of 30% should be replaced by 1/3<sup>rd</sup></p> <p>3) that consideration be given to removing “permitted development rights” on properties specifically provided as affordable housing</p> <p>4) that efforts be made to ensure that room size in affordable houses remains viable.</p>	<p>See line 14 of Appendix B.</p> <p>The figure of 30% is recommended by the consultants in the Housing Needs Study and does give rise to accounting problems.</p> <p>A valid comment.</p> <p>Noted.</p>	<p>See line 14 of Appendix B.</p> <p>That 30% be replaced by 1 in 3.</p> <p>Amend the SPG to refer to the point.</p> <p>None.</p>
Replacement Local Plan Task Group	That Cabinet be informed that the Task Group endorses both the content of the Supplementary Planning Guidance and the changes to Policies AP37 and AP38 of the Local Plan and recommends their use for the purposes of development control.	Noted.	None.

## APPENDIX D

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

Statement by Suffolk County Council under Section 46(2)

### **Suffolk Coastal Local Plan Alteration 2: Affordable Housing**

Suffolk County Council hereby notifies Suffolk Coastal District Council that the Suffolk Coastal Local Plan Alteration 2: Affordable Housing is not in general conformity with the Suffolk Structure Plan 2001. Alteration 2 policy AP37A could under certain circumstances lead to the approval of affordable housing development on land abutting or well related to the defined physical limits of the towns of Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge with part of Melton, contrary to the provisions of policies CS3(e), CS9(b) and ENV6 of the Structure Plan.

Policy CS9 was drafted to reflect the relevant provisions of Circular 6/98: "Planning and Affordable Housing" and PPG3 "Housing". In all these sources of policy guidance, the "exceptions policy" for affordable housing is specifically linked to villages.

Although in no case is its application to towns explicitly excluded, paragraph 4 of Annex B to PPG3 makes clear that the basis of the policy is one of permitting very limited exceptions to established policies of restraint.

Policy CS3(e) indicates that, subject to specified criteria, housing development primarily meeting the needs of a local area may be located on sites adjacent to the built up area of towns and villages. Such sites should be identified in the local plan. Proposals not identified in this way would conflict with Structure Plan policy ENV6, which states that new housing in the open countryside (i.e. outside defined settlement boundaries) will only be acceptable where essential for key personnel employed in agriculture, horticulture or forestry.

It is noted that the Government's draft amendments to PPG3, which were the subject of consultation in 2003 but have not yet been confirmed, would permit local authorities to make land allocations adjoining towns and villages specifically for affordable housing.

Suffolk County Council  
5 May 2004