Suffolk Coastal Local Plan Examination

Hearing Day 8

Matter 4 Policies

Note on Policy SCLP5.10 Affordable Housing on Residential Developments

1. This note responds to an action arising in the hearing session on Matter 4 Policies (Wednesday 18th September, AM) which relates to the provision of a note to set out modifications in relation to Policy SCLP5.10 Affordable Housing on Residential Developments.

2. Inspector’s question 4.10 asked whether the requirement for 1 in 3 dwellings on sites of ten units or more to be affordable units and the split between affordable/social rent, shared ownership and discounted home ownership is justified and consistent with national policy and whether these requirements are deliverable and viable? The Council provided a response to this question in its Matter 4 Statement (pages 16-17). In relation to viability, the Council’s response refers to the conclusion of the Whole Plan Viability Study that the achievement of the policy requirement is viable other than in relation to brownfield, flatted development.

3. During the hearing session above, the Inspector asked the Council to consider a modification to the supporting text related to viability, to reflect that the Whole Plan Viability Study has concluded that achievement of the policy may not viable in relation to brownfield, flatted development. The Council’s Matter 4 Statement explains that it is not considered necessary for Policy SCLP5.10 to reflect this scenario as the development of brownfield flatted development is not anticipated to contribute significantly to the delivery of the Plan, albeit that the Plan does identify a role for such development as part of the strategy (for example, under Policy SCLP12.25 Suffolk Police Headquarters, Martlesham). Whilst the conclusions in the written element of the Whole Plan Viability Study identify situations where affordable housing provision would not be viable, and the ‘Flats Appraisal’ element of the appendices generally show negative values, these demonstrate that there may be some (albeit limited) instances where it would be viable to deliver affordable housing on brownfield sites.

4. To clarify the position, the Council would support a modification to paragraph 5.62 as set out below. In order to add further explanation, the following modifications are proposed. Modifications are shown in strikethrough for deleted text and in underline for additional text. The Council will include this revised wording in the schedule of modifications that is being collated as part of the Examination.
Modifications to Paragraph 5.62:

“In exceptional circumstances where proposals are not able to meet the requirements for affordable housing for viability reasons, and to ensure that development can still come forward and overall housing delivery is not compromised, the Council may agree to alter the requirements subject to this being demonstrated through a comprehensive viability assessment, to the Council’s satisfaction. Before reducing the overall provision of affordable housing, the tenure and type of affordable housing should be first adjusted to secure viability. In line with the National Planning Policy Framework, viability assessments will be made publicly available. Guidance on viability assessments is contained in Appendix G. The Council’s Whole Plan Viability Study (January 2019) identified a series of site and development typologies that are common across the District. The Study shows that flatted developments on brownfield sites may not be viable when meeting the policy requirement for affordable housing. Nevertheless, where at the planning application stage provision of affordable housing is considered by an applicant to not be viable the Council would require demonstration of this through a viability assessment following the guidance contained in Appendix G. In determining whether a site has capacity for more than ten units, consideration will be given to the potential developable area of a site and an appropriate density for development that accords with Policy SCLP11.1 Design Quality. The National Planning Policy Framework states that where vacant buildings are being re-used or redeveloped an affordable housing contribution should be reduced by a proportionate amount.”