



WOODBIDGE TOWN COUNCIL

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TO MEMBERS OF THE PLANNING COMMITTEE

Cllr Bale

Cllr Lady Blois

Cllr Holdcroft

Cllr Mapey

Cllr Miller

Cllr O'Nolan

Cllr Sanders

Cllr Sutton

Cllr Walsh

You are hereby summoned to attend the **MEETING** of the **PLANNING COMMITTEE** to be held virtually on: **MONDAY 14TH DECEMBER 2020 at 5PM**

Greg Diaper

Locum Town Clerk

8th December 2020

Public Attendance

Members of the public and press are welcome to join the Zoom meeting. Members of the public will be invited to give their views/questions the Town Council on issues on the agenda, or raise issues for consideration or inclusion at future meetings. This item will be limited to 30 minutes duration but may be extended at the discretion of the Mayor. The Zoom login details are provided below;

<https://us02web.zoom.us/j/89783748586?pwd=QjBhR2d2M0o5T2h1NFhucFpJMG16Zz09>

Meeting ID: 897 8374 8586

Passcode: 495867

AGENDA

1. APOLOGIES

To receive apologies for absence.

Please be aware that the recording of this meeting is probable

2. DECLARATION OF INTEREST

Members and officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the meeting if it becomes apparent that this may be required when a particular item or issue is considered.

3. REQUESTS FOR DISPENSATION

Councillors with a Pecuniary Interest in an item on this Agenda, who wish to remain, speak, and/or vote during consideration of that item, may apply for a dispensation in writing to the Town Clerk prior to the meeting. Applications may also be considered at the meeting itself should the nature of the interest become apparent to a Councillor at the time of the meeting.

4. CONFIRMATION OF PLANNING COMMITTEE MINUTES

To confirm the minutes of the Planning Committee held on 1st December 2020.

5. PUBLIC QUESTION TIME

For the public to ask questions of the Council or raise issues for consideration at a future meeting of the Council. 15 minutes maximum.

6. TO NOTE INTENTIONS TO UNDERTAKE WORKS TO TREES IN THE CONSERVATION AREA – ATTACHED

7. TO COMMENT ON APPLICATIONS FOR PLANNING PERMISSION

To comment on applications as set out on the attached schedule.

8. TO NOTE EAST SUFFOLK COUNCIL DECISIONS ON PLANNING APPLICATIONS WHERE THOSE DECISIONS ARE CONTRARY TO THIS COUNCIL'S RECOMMENDATIONS MADE ON 22ND SEPTEMBER, 6TH AND 20TH OCTOBER AND 3RD NOVEMBER– ATTACHED

9. TO COMMENT ON THE SIZEWELL C CO. LTD CONSULTATION ON PROPOSED CHANGES TO THE SIZEWELL C DCO APPLICATION – ATTACHED

10. TO COMMENT ON THE DRAFT AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT - ATTACHED

11. CLOSURE

Please be aware that the recording of this meeting is probable

WOODBRIIDGE TOWN COUNCIL

Minutes of an on-line meeting of the PLANNING COMMITTEE held on TUESDAY 1ST DECEMBER 2020 at 6pm

Councillors:

Present: S Bale, S Miller, O’Nolan, R Sanders, M Sutton and C Walsh

Apologies: Lady C Blois and G Holdcroft

Absence without
Apologies: C Mapey

In Attendance: Locum Town Clerk, Deputy Town Clerk and no members of the public

Action

634. APOLOGIES FOR ABSENCE

Apologies for absence had been received from Councillors Blois and Holdcroft.

635. MEMBERS AND OFFICERS WERE INVITED TO MAKE ANY DECLARATIONS OF DISCLOSABLE PECUNIARY OR LOCAL NON-PECUNIARY INTERESTS THAT THEY MAY HAVE IN RELATION TO ITEMS ON THE AGENDA AND WERE ALSO REMINDED TO MAKE ANY DECLARATIONS AT ANY STAGE DURING THE MEETING IF IT BECOMES APPARENT THAT THIS MAY BE REQUIRED WHEN A PARTICULAR ITEM OR ISSUE IS CONSIDERED, AND TO DEAL WITH DISPENSATIONS AS REQUESTED BY INDIVIDUAL COUNCILLORS IN LINE WITH S33 OF THE LOCALISM ACT 2011

Councillor Miller declared a local pecuniary interest in item 642 as an employee of a social housing provider.

No other members declared an interest in matters on the agenda.

636. COUNCILLORS WITH A PECUNIARY INTEREST IN AN ITEM ON THIS AGENDA, WHO WISH TO REMAIN, SPEAK AND/OR VOTE DURING CONSIDERATION OF THAT ITEM, MAY APPLY FOR A DISPENSATION BY WRITING TO THE TOWN CLERK PRIOR TO THE MEETING. APPLICATIONS MAY ALSO BE CONSIDERED AT THE MEETING ITSELF SHOULD THE NATURE OF THE INTEREST BECOME APPARENT TO A COUNCILLOR AT THE TIME OF THE MEETING

Councillor Miller requested a dispensation to remain, speak and vote on item 642, which was granted by the Committee.

There were no other requests from Councillors with a Pecuniary Interest in an item on this Agenda for a dispensation.

637. PUBLIC QUESTION TIME

There were no members of the public present.

638. TO AGREE AND APPROVE THE MINUTES OF THE PLANNING COMMITTEE MEETING HELD 17TH NOVEMBER 2020

The Committee agreed and approved the signing of the minutes of the Planning Committee meeting held 17th November 2020 as a true record.

639. TO COMMENT ON APPLICATIONS FOR PLANNING PERMISSION

The Council agreed their comments as set out below:-

Application No and Address	Committee Comments
DC/20/4581/TCA 7 Queens Head Lane	The Committee agreed to seek an extension of time and requested that East Suffolk Council ensure the applicant supplies the required information needed to determine the application. The application form indicates that the tree is subject to a TPO but this is not corroborated by the East Suffolk online map of TPO's, and there is no supporting evidence to support the claim that damage is being done to neighbouring property.
DC/20/4665/FUL 25 Peterhouse Crescent	We recommend APPROVAL

640. TO NOTE EAST SUFFOLK COUNCIL DECISIONS ON PLANNING APPLICATIONS WHERE THOSE DECISIONS ARE CONTRARY TO THIS COUNCIL'S RECOMMENDATIONS MADE ON 22ND SEPTEMBER, 6TH AND 20TH OCTOBER

The Committee noted that DC/20/3716/TCA was approved contrary to its decision, and that there were no further East Suffolk Council decisions on planning applications where those decisions are contrary to this council's recommendations made on 22nd September, 6th and 20th October.

641. TO COMMENT ON THE SIZEWELL C CO LTD CONSULTATION ON PROPOSED CHANGES TO THE SIZEWELL C DCO APPLICATION

The Committee agreed that Councillor Sanders be asked to provide draft comments on the Sizewell C Co Ltd consultation on proposed changes to the Sizewell C DCO application in the form of a letter, setting out not this Council's support or objections, but the mitigation needed to offset all options and long-term compensatory benefits to be delivered as part of that mitigation.

642. TO COMMENT ON THE DRAFT AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

The Committee agreed that the Locum Town and Deputy Town Clerks be asked to draft comments on the draft Affordable Housing Supplementary Planning document for consideration at the next meeting of this Committee.

643. CLOSURE

The meeting was closed at 7.07pm.

Councillor Miller
Chair

ITEM 6

TO NOTE INTENTIONS TO UNDERTAKE WORKS TO TREES IN THE CONSERVATION AREA

Neither the District Council nor the Town Council can object to these works unless the tree(s) is/are covered by a Tree Preservation Order.

This schedule is for information only.

DC/20/4770/TCA - Westhall Burkitt Road	Expiry Date: 17.12.20
	Determination Deadline: 03.01.21
2no. Limes on road frontage to be re-pollarded.	

ITEM 7

TO COMMENT ON APPLICATIONS FOR PLANNING PERMISSION

DC/20/4778/FUL - Quay House 1 Station Road	Expiry Date: 16.12.20
	Determination Deadline: 18.01.21
Proposed rear single storey extension to dwellinghouse (Existing external store to be removed)	

DC/20/4779/LBC - Quay House 1 Station Road	Expiry Date: 16.12.20
	Determination Deadline: 18.01.21
Proposed rear single storey extension to dwellinghouse (Existing external store to be removed)	

DC/20/4519/FUL - Land To The South Of 47 Oxford Drive	Expiry Date: 17.12.20
	Determination Deadline: 19.01.21
Construction of two dwellings on land forming part of the curtilage of 47 Oxford drive and associated works.	

DC/20/4551/FUL - 6 Sandy Lane	Expiry Date: 18.12.20
	Determination Deadline: 20.01.21
Proposed extension and alterations	

DC/20/4786/FUL - 37 Grundisburgh Road	Expiry Date: 22.12.20
	Determination Deadline: 18.01.21
Change of use of existing detached 1.5 storey studio / storage building into domestic annex forming new habitable accommodation ancillary to that of the host dwelling and for use by family members only	

DC/20/4879/FUL - 47 Grundisburgh Road	Expiry Date: 30.12.2020
	Determination Deadline: 25.01.21
Remove existing rear single storey structures, new two storey rear extension and front porch	

ITEM 8

TO NOTE EAST SUFFOLK COUNCIL DECISIONS ON PLANNING APPLICATIONS WHERE THOSE DECISIONS ARE CONTRARY TO THIS COUNCIL'S RECOMMENDATIONS MADE ON 22nd SEPTEMBER, 6th AND 20th OCTOBER AND 3rd NOVEMBER

There were five applications on which this Council commented on 22nd September. Three have previously been reported to this Committee. Neither of the remaining two (DC/20/3453/FUL and DC/20/3580/VOC) have yet been determined by East Suffolk Council.

There were eleven applications on which this Council commented on 6th October. Nine have been determined by East Suffolk Council in line with our comments. One (DC/20/3716/TCA – previously reported) was approved contrary to our comments, and one has not yet been determined by East Suffolk Council.

There were five applications on which this Council commented on 20th October. All have been approved in line with our comments.

There were six applications on which this Council commented on 3rd November. Two have been determined in line with our comments and four (DC/20/4202/FUL, DC/20/4203/LBC, DC/20/3753/LBC and DC/20/4221/LBC) have still to be determined.

This item is for information only.

ITEM 9

TO COMMENT ON THE CHANGES TO THE DEVELOPMENT CONTROL ORDER FOR SIZEWELL C

Members are to agree their comments on the changes to the Development Control Order

The Sizewell C Project - Consultation on Proposed Changes November – December 2020

Response of Woodbridge Town Council

Executive Summary

Woodbridge Town Council ('WTC') have examined the consultation document and its response is in headed sections below.

WTC in its response does not advocate the adoption of any of the proposed changes presented in the consultation as it considers the detail provided is inadequate. There is no indication of proposed mitigation by NNB Generation Company (SZC) Ltd ('SZC Co') for the adverse impact of changes and revised detailed environmental impact, noise and other assessments is not provided.

WTC will present its detailed view of any changes that SZC Co presents to the Examining Authority ('ExA') for the Development Consent Order ('DCO') as, and when, ExA has deemed such changes, along with supporting documentation, are acceptable to be included in the examination of the current DCO Application.

WTC in this response indicates proposed changes it deems inappropriate. It presents potential appropriate mitigation and compensatory benefit for each of the proposed changes should they form part of changes presented for DCO examination. These are based on what WTC considers are the potential impacts of the proposed changes upon individuals and/or the environment within, and adjacent to, the boundaries of the town. Brief discussion is given to certain other proposed changes where adverse impact may occur to individuals using public access facilities.

Detailed Response

Freight Management Strategy

Woodbridge centre lies to the immediate east of the A12 route designated for HGV road transport for both Sizewell C and the East Anglia Two project. The residential outskirts of Woodbridge are however beside, and locally traversed by, the A12. Residential properties lie both sides of the A12 between the A12/B1069 roundabout and the A12 junction with Manor Road to the north.

The eastern part of central Woodbridge is traversed by the B1438 which runs from a roundabout junction with the A12 southwest of Woodbridge via the centre of Woodbridge, Melton, Ufford and Wickham Market before returning to the A12 just north of the proposed Southern Park and Ride, north of Wickham Market. This road also has a junction with the A1152 in Melton.

The East Suffolk railway line traverses the eastern part of the town and its centre. Both the B1438 and railway pass through the residential and conservation area of Woodbridge over extended lengths. The railway forms the boundary to the Deben Estuary AONB.

Woodbridge will thus be impacted by road and rail freight transport to and from the Sizewell C, the preparatory work for such use and further use until the complete decommissioning of the plant.

Road freight transport

The A12 up to the roundabout junction of the A12/B1438 is unrestricted dual carriageway but between that junction and the A12/B1069 roundabout becomes an unrestricted single lane carriageway after the Seckford Hall turnoff until just short of the A12/B1069 roundabout. Between that point and just north of the entry of Manor Lane onto the A12 the dual carriageway is restricted to 40mph and includes a signal-controlled pedestrian crossing. Thereafter to the A12/A1152 roundabout the dual carriageway is restricted to 50mph.

WTC has concerns about the increase in HGV along the A12 with the Freight Transport road transport change in the consultation as, whilst the number of HGV's is reduced over the DCO application proposal, even with current traffic levels queues develop at peak periods.

Northbound this occurs back from the A12/B1069 roundabout and/or the end of the dual carriageway at the Seckford Hall turnoff southwest of the A12/B1438 junction. The queues often extend west of the A12/B1438 junction. When these queues form the dedicated right turn lane onto the B1438 remains clear leading to traffic diverting through Woodbridge on the B1438.

Southbound this occurs back from the A12/B1069 roundabout towards the A12/A1152 roundabout. Queuing leads to drivers seeking alternative routes to the A12 further south/north by diversion through Woodbridge, principally along the A1152/B1438 but also via other roads such as Bredfield and Pytches Road to avoid the A1152/B1438 junction.

Whilst we recognise that HGV vehicles will be monitored by GPS tracking and will be sanctioned for using routes off the A12, any increase in traffic levels on the A12 northbound and southbound will lead to more frequent, and longer, queues and more regular diversion of traffic through Woodbridge. This will inevitably include non-HGV Sizewell C traffic which is currently not proposed to be monitored, as well as vehicles that already divert to avoid these queues. The additional non-HGV SZC traffic will only add to the issues of exceedance of air pollution levels which exist at the Lime Kiln Quay Road/Thoroughfare traffic light-controlled junction. It will also adversely impact the use of Woodbridge as a shopping centre and tourist attraction thereby affecting the economy of the town.

WTC consider that SZC Co, for any freight transport option selected for the DCO application, should provide mitigation works to prevent, and reduce, the use of the B1438 and other cross-town roads by non-HGV Sizewell C traffic.

The mitigation options we wish SZC Co to adopt and fund are as follows:

- Mandatory GPS tracking of all non-HGV Sizewell C related vehicles, including staff private vehicles, combined with the same sanctions as for HGV traffic
- Restriction of all non-HGV Sizewell C related vehicles to travel along the A12 north of the A12/A1214 roundabout at Martlesham
- Assist funding for signage and road calming for the Suffolk County Council approved 20mph zone through Woodbridge along the B1438 and other cross-town roads to reduce the attractiveness of the B1438 for through traffic.

Whilst these measures would provide partial mitigation WTC consider that there will be residual impact for the long period of Sizewell C use of the local highway network for construction. We thus seek the following compensatory benefits:

- Improved footpaths along the A12/B1438 with accompanying cycle lanes into Woodbridge

Finally, in response to our questions on the road transport aspects of the freight management you have indicated that you are considering the potential to use larger capacity, 28.5 tonne, HGV vehicles. WTC would look favourably on the use of these larger capacity vehicles to reduce the number of HGV vehicle movements along the A12.

Rail Freight transport

The East Suffolk Line traverses Woodbridge with numerous level crossings and has a restricted speed limit of 15mph through much of the town. Line control signals are located at Woodbridge station for both northbound and southbound trains. For northbound trains these hold trains at Woodbridge station until the line is clear of all other traffic up to Saxmundham. For southbound trains these signals hold trains if there is a train delay or line obstruction between Woodbridge and Westerfield junction.

Two of the level crossings in Woodbridge, namely the vehicular crossing to Everson's boat yard from the Avenue and the pedestrian crossing to the south of Kingston Fields Recreation Ground, do not have automatic gates, light and sound-based warning systems.

Three other vehicle/pedestrian crossings lie immediately north of Woodbridge station. Whilst controlled by automatic gates, lights and sound warnings they provide the only vehicular access into the residential housing and house boats to the river side of the crossings. There is also no vehicular link between these crossings east of the railway. Tidal flood gates exist east of the railway at each of these crossings. The proposed 339m long freight trains, if halted at Woodbridge station line signals, will block all three crossings.

Residential housing is near to the line, some of which is historic with single glazing. Many of the properties are occupied by elderly residents. One property at Woodbridge station, the former station house is a guesthouse/B&B.

Passenger trains operate on the East Suffolk Line between Saxmundham and Ipswich between 0620 and 2250, the latter being the last Lowestoft bound train which can be delayed awaiting any late running 2100 train out of Liverpool Street.

WTC has concerns about any of the rail freight options utilising night-time operation due to

- the impact on residents/guests sleep and mental well-being of train klazons over a substantive residential area east of the B1438
- the impact of noise and/or vibration from passing trains on residents/guests sleep, general health and mental well-being
- the further impact of air pollution and risks associated with possible delayed freight trains idling at the line signals located at Woodbridge station. Idling Lowestoft bound trains impacting severely on guests at the Station Guesthouse, residential properties either side of the level crossing to the quay and house boats.
- Ipswich bound trains preventing emergency services access to residential properties and house boats east of the railway line.
- The impact on passenger services as the proposed change provides minimal resilience for any train breakdowns, timetabling delays or line obstructions e.g. tree falls.

WTC remains strongly opposed to any night-time train operation and seek SZC Co adopt measures to allow the use of daytime freight trains whilst not impacting on passenger services. We concur with Melton Parish Council on the need for SZC co to adopt dualling of the East

Suffolk Line south of Campsea Ashe and Wickham Market station to allow trains to pass along this stretch of railway, as proposed in its Consultation 3. Whilst SZC Co has made effort to remove night-time rail traffic through Leiston it is failing to similarly do so for other town and villages along the line.

If SZC Co continue to include night-time freight train operation in its DCO application, and any change involving additional night-time trains, WTC seek adoption of the following mitigation by SZC Co as a minimum:

- the installation of audible and light alarms at the two level crossing without these features so as to avoid freight trains using klaxons on the approach to these level crossings
- pre enabling works independent expert background night-time noise, vibration and a structural condition survey for each and every residential properties and the Station guesthouse; background night-time noise surveys for each and every houseboat and a structural condition survey for each and every other property within a suitably agreed bound as determined by an independent expert.
- pre Sizewell C freight train use enabling works to include but not limited
 - a) noise reduction glazing of residential and guesthouse properties,
 - b) continuous welded rail track with ballast mats and elastomeric base plate pads
- installation of new track side signals for freight trains 350m south of Woodbridge Station to prevent any idling at Woodbridge station and any southbound delayed train blocking emergency vehicle access to residential properties east of the railway line
- bridge/culvert strengthening works as necessary on the East Suffolk line such that post Sizewell C construction delays are not occasioned by accelerated degradation of these features by Sizewell C freight train traffic. Consultation 3 indicated there were such structures present.

Notwithstanding these mitigation measures for any night-time freight train option in the DCO application to be presented to the EXa, WTC along with Melton Parish Council consider it essential with an increase of night-time trains to 4, possibly 5 per day that localised dualling of the East Suffolk Line south of Campsea Ashe and Wickham Market station is built to provide resilience.

Beach Landing Facility ('BLF')

WTC have noted the various proposed change options to the BLF. Enhancement of the BLF has previously been discounted by SZC Co due to their adverse impact on coastal processes and the local environment.

Whilst these proposed changes may reduce the impact on Woodbridge of HGV road transport to Sizewell C it is apparent from Table 3.7 that considerable further assessment of the impact of these changes remains to be completed. The proposed changes may globally impact the Suffolk Coast and as such WTC do not wish to further comment upon these changes until a better understand of the impact is known.

Main Development Site

Sea Defences

WTC has expressed concerns in its Relevant Representation on the impact of the sea defences on the Suffolk Coast and its use by Suffolk residents. WTC notes the intention in the proposed change to substantially raise the Hard Coastal Defence ('HCD') during the operational phase to more fully account for projected climate change.

WTC further notes from comparing Figure 4.5 and Figure 4.19 in the Consultation document that SZC Co propose to place a temporary sea defence sheet pile wall seaward of the line of the Hard HCD. Whilst recognising the figures are diagrammatic, the top of the wall is stated in the text as 7.3m OD. There will be a significant level difference to the beach in front, as shown in Figure 4.19, where the coastal path will be diverted to. WTC believe this may place users of the coastal path at risk during any combined spring tide/storm surge event as a sheet pile wall provides no option for refuge unlike a sloped revetment.

Associated Development

Southern Park and Ride

WTC notes the proposed landscaping changes to the Southern Park and Ride and leave comment on those changes to the immediately adjacent parishes. However, WTC are concerned that with the Southern Park and Ride's current location if monitoring of non-HGV traffic is not adopted as a proposal in the DCO application. Any significant delay at the A12/A1438 roundabout will inevitably lead to such traffic using the B1438 through Woodbridge to access the southern Park and Ride facility north of Wickham Market.

WTC along with Melton Parish Council are of a joint view that SZC Co should reconsider the Southern Park and Ride location and adopt the formerly proposed location at the A12/A1152 junction in Consultation 2. The adoption of this location with access only possible via the A12 northbound carriageway would avoid rat runs to the park and ride when queues develop.

Remaining Proposals

WTC does not wish to comment on other Main Development Site and Associated Development Changes. WTC consider these are matters for the local parishes to these features to comment upon.

ITEM 10

TO COMMENT ON THE DRAFT AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

East Suffolk Council is in the initial stages of preparing a new Affordable Housing Supplementary Planning Document and are carrying out an initial consultation between 9th November and 21st December 2020. The Council's suggested response is: -

This Council is responding to the pre-consultation on the Draft Affordable Housing Supplementary Planning Document.

We would wish to make the following comments for inclusion in the Draft document when published:-

- a) We note that this document is intended to apply across the whole of the East Suffolk Council area even though there is no comprehensive Local Plan for the whole of the area. As such it may fail to include some of the local nuances contained in the individual Local Plans.*
- b) We note that "Needs for affordable housing have been identified through the Strategic Housing Market Assessments that were produced as part of the evidence base to inform the production of the two Local Plans". This information is now some years old and we would argue that both time, and the impact of COVID19 with the overnight changes to working patterns (and unemployment) requires a re-assessment of the need.*
- c) We note that the consultation document talks of the Housing Strategy increasing the overall number of affordable homes in Waveney by 150 units per annum and in Suffolk Coastal by 100 units per annum, whereas the Council's Housing Development Strategy talks of only directly providing 50 affordable homes across the whole of East Suffolk. This may no longer reflect the actual housing need – it is fine providing "affordable" properties for purchase by a variety of schemes aimed at the lower waged, but the current state of the economy is a barrier to raising the entry-level deposits, and also affecting the financial viability of some developments and thereby reducing the number of affordable units being built.*
- d) We note the definition of affordable housing in the NPPF and the Government's intention to introduce "First Homes" and thereby further move the affordable homes market into the home ownership route, rather than maintain a significant proportion of rented affordable homes. We would expect this SPD to set out a minimum percentage of rented affordable homes to be provided, based on a new housing needs assessment which includes reference to an individual's ability to finance any of the non-rented options.*
- e) We note that it is proposed that the SPD will provide guidance on how an appropriate mix (size and tenure) of affordable housing is to be identified at the site specific level, within the scope of the Local Plan policies. This should have reference to a town/parish analysis of housing need rather than a District-wide analysis.*

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- f) *We note that the SPD will also cover requirements for affordable housing on specialist housing developments (such as extra care accommodation) and that guidance will be provided on affordable housing provision in build to rent developments. These should be based on local analysis of housing need.*
- g) *We agree that that model Heads of Terms (i.e. the content of Section 106 agreements) and model clauses should be included in the SPD, and that upon adoption of the SPD we plan to use these heads of terms as a default in all s106 agreement but would like some town/parish council involvement in developing alternatives if specific and exceptional circumstances dictate otherwise.*
- h) *We note that the SPD will include guidance on the circumstances in which a commuted sum may be payable, how the amount will be determined and on the broad principles of how commuted sums will be spent but are totally opposed to the failure of the SPD to set out the Council's policy or programme on the spending of commuted sums. It is totally unacceptable for a commuted sum accrued by a development in X is not used to provide affordable housing in X but perhaps miles way. This has undertones of enabling the creation of wealthy areas at the expense of locals in need of affordable housing.*
- i) *We note that Local Plan policies WLP8.2 and SCLP5.10 provide for exceptional circumstances under which the requirement for affordable housing under the policies may be varied. Guidance on viability appraisals is set out in Appendix 5 of Waveney Local Plan and Appendix G of the Suffolk Coastal Local Plan and that the SPD will set out the necessary steps where a 'variation' to the requirement is sought. Given the current economic situation whereby developers may wish to avail themselves of an opportunity to reduce their contributions, should the policies WLP8.2 and SCLP5.10 be strengthened ?*
- j) *We note that Paragraph 63 of the NPPF states that where vacant buildings are being reused or redeveloped the affordable housing contribution should be reduced by that amount. In the SPD it would be helpful to include the footnote to that paragraph, which reads "Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned."*
- k) *We note that the Local Plans expect that affordable housing will be built to the same design standards as market housing. The SPD will provide guidance on design matters related to affordable housing including how this relates to other design related policy/guidance such as Building for Life 12. As it is an established fact that lower income families are inversely affected by energy costs, provision should be made in the SPD and Planning Policy for all such properties to meet the highest thermal insulation rating and be heated by alternative methods such as ground source heat pumps.*
- l) *We note that the SPD will provide guidance on how local need should be identified, for example how local surveys or assessments should be carried out and what information would be needed. This guidance should include how frequently these surveys are to be undertaken.*

Members are recommended to agree this response

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The Affordable Housing Supplementary Planning Document (SPD) will provide guidance on the implementation of the Council's planning policies related to affordable housing, and will be a material consideration in the determination of planning applications. Upon adoption the SPD will replace the following existing guidance documents:

- Supplementary Planning Guidance 2 Affordable Housing (July 2004) – this relates to the former Suffolk Coastal area, and;
- Affordable Housing Supplementary Planning Document (May 2012) – this relates to the former Waveney local planning authority area.

At this early stage, the Council is contacting key stakeholders (including the development sector, registered providers of affordable housing, town and parish councils, community housing organisations and other relevant organisations) as we are particularly interested in your views on the proposed scope and content of the SPD. The Council has prepared a questionnaire and a short consultation document for this initial consultation stage; the questionnaire - www.eastsuffolk.gov.uk/supplementary-planning - is nine questions in length and seeks views on what guidance you consider should be included in the SPD to support the implementation of the policies on affordable housing contained in the Council's Local Plans.

The questions are:-

1. Do you consider that the proposed content of the SPD is appropriate? Yes/No If no, please suggest how the scope and content of the SPD should be amended.
2. Are there any elements of the existing Affordable Housing Supplementary Planning Document (May 2012) or the Supplementary Planning Guidance 2 Affordable Housing (July 2004) that should be retained? Please provide details.
3. Are there any elements of the existing Affordable Housing Supplementary Planning Document (May 2012) or the Supplementary Planning Guidance 2 Affordable Housing (July 2004) that should not be retained? Please provide details.
4. Are there any specific elements of the Local Plan policies that you consider require additional guidance in the SPD? If yes, please explain what guidance is required.
5. Are there any elements of national policy on affordable housing that you consider require additional guidance in the SPD? If yes, please explain what guidance is required.
6. Are there any specific elements of Section 106 agreements that you consider need particular explanation or guidance in the SPD? If yes, please explain what guidance is required.
7. Do you have any views on the design of affordable housing that you consider should be addressed in the SPD?
8. Are you aware of any good practice in existing SPDs from elsewhere that could be applied in East Suffolk? If yes, please provide details.
9. Do you have any other comments for us to consider in drafting the Affordable Housing SPD?

Members are to agree their responses

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