Suffolk Coastal Local Plan Examination

Note on proposed modification to SCLP5.10 Affordable Housing on Residential Developments.

1. This note responds to the Inspector’s post hearings letter dated 31st January 2020 and also the
Inspector’s comments within the first review of the table of modifications that has been prepared by
the Council to identify amendments to the plan.

2. During the hearing sessions the viability of developments and the Council’s Whole Plan Viability
Study (Document D38) was discussed. Following these discussions the Council proposed
modifications to paragraph 5.62 of the Final Draft Local Plan (as submitted) to reflect that the
evidence shows flatted developments on previously developed land may not be viable when
meeting the policy requirement for affordable housing.

3. The Council’s monitoring shows that flatted developments do not make a significant contribution to
the delivery of units across the plan area and therefore the evidence does not undermine the
soundness of the plan subject to examination.

4. The Inspector’s letter dated 31st January 2020 seeks an amendment to Policy SCLP5.10 to
accompany the modification already identified to make it clear that the affordable housing
requirement does not apply to brownfield flatted development.

5. After considering the request from the Inspector in his post hearings letter the Council propose the
modifications to paragraph 5.62 and Policy SCLP5.10 below to further address the viability of
affordable housing in brownfield flatted development. The modifications set out below have
resulted in a grammatical change and the removal of the word “nevertheless” from the text
previously proposed by the Council.

6. Modifications are shown in **strikethrough** for deleted text and in **underline** for additional text. The
Council will include these revisions in the schedule of modifications that has been collated as part of
the Examination.

Modifications to Paragraph 5.62 (the proposed further modification is shown in grey shading):

“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 **solely flatted developments on brownfield sites may not be viable when meeting the policy requirement for affordable housing.** Schemes which propose a mix of unit type, will be assessed as a **whole to determine the level of affordable housing to be provided.** Where at the planning application stage provision of affordable housing in accordance with Policy SCLP5.10 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.”

**Modifications to Policy SCLP5.10:**

“**Proposals for residential development with capacity for ten units or more or sites of 0.5ha or more will be expected to make provision for 1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need.**

Proposals which provide a higher amount of affordable housing than that set out above will also be permitted.

Of these affordable dwellings, 50% should be for affordable rent / social rent, 25% should be for shared ownership and 25% should be for discounted home ownership.

Provision is expected to be made on-site, unless it can be demonstrated in exceptional circumstances that it is not feasible or practical to provide the units on site in which case it may be agreed that a commuted sum could be paid towards provision of affordable housing outside of the site.

In exceptional circumstances, where the Council is satisfied that the provision of affordable housing is not viable, as demonstrated through a viability assessment the Council may agree to vary the requirement for affordable housing. **The requirement for affordable housing does not apply to developments which are solely brownfield flatted schemes.** In schemes with a mix of housing types the affordable housing provision will be assessed as a whole.

Neighbourhood Plans may set requirements for a greater proportion of affordable housing where this is supported by evidence of need and viability assessment.”