

STATEMENT OF CONSULTATION
Regulation 18 (4) (b) Town and Country
Planning (Local Development) (England)
Regulations 2004

AFFORDABLE HOUSING
SUPPLEMENTARY PLANNING
DOCUMENT

March 2009

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Introduction

1. This document sets out how Babergh District Council involved the public in the preparation of the Supplementary Planning Document (SPD) on Affordable Housing in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2004 and the Statement of Community Involvement. The Statement of Compliance is attached in Appendix 1.
2. The regulations require that a SPD is accompanied by a consultation statement setting out the following:
 - Who was consulted regarding the SPD;
 - Methods of consultation;
 - Summary of the main issues raised; and
 - How the issues have been addressed in the SPD.
3. The Sustainability Appraisal for the SPD is a key part of the process and consultation regarding the Sustainability Appraisal for the SPD will also be addressed in this document.

Purpose of the SPD

4. The purpose of the SPD is to provide detailed guidance on the implementation of Policies HS08 and HS09 of the Babergh Local Plan, Alteration No 2. Guidance is provided in terms of:
 - Affordable housing needs within the district;
 - Type and amount of affordable housing;
 - Sustainability considerations and the calculation of commuted sums when affordable housing cannot be appropriately provided on site;
 - Design and Integration of Affordable Housing;
 - Setting out the Planning Application Procedure to be followed when Policies HS08 and HS09 are applied; and
 - Setting out affordable housing monitoring mechanisms.

Who was consulted; how they were consulted and the Council's response to issues raised

Pre- Production Stage

5. External consultation was undertaken during the drafting of the SPD. Comments were sought from the following organisations, Registered Social Landlords and planning agents / developers:
 - Babergh East LSP
 - Western Suffolk LSP
 - Hastoe Housing Association
 - Orbit Housing Association
 - Orwell Housing Association
 - Flagship Housing Group
 - Icen Homes Ltd
 - Andrew Martin Associates
 - GL Hearn Planning
 - House Builders Federation
 - Housing Corporation Eastern Region
 - Hopkins Homes Limited
 - Indigo Planning Limited
 - John Peacock Planning
 - Lacy Scott & Knight
 - Peacock & Smith

- Ashwell
- Bidwells
- Birketts
- Bovis Homes
- Boyer Planning
- Barton Willmore
- CgMS
- Carter Jonas
- David Whymark Building Design & Conservation
- Edward Gittins Planning Consultant
- Entec UK Ltd
- Fenn Wright
- Geral Eve
- Percivals
- Persimmon Homes
- Pegasus Planning Group
- Rapleys
- Robinson & Hall
- RPS
- Robert Turley Associates
- Savills
- Stuart P Reid Planning Services
- Strutt & Parker
- Tim Harboard Associates
- Tricker Blackie Associates

6. The external consultation took the form of a consultation pack forwarded to the mentioned organisations including background regarding the SPD document, the relevant development plan policies and a questionnaire to facilitate the consultation. This information was also published on the Council's website and interested parties could view all documentation online as well as comment online. The response rate was poor and only responses were received from the Home Builders Federation (HBF), Ashwell and Babergh East LSP. This is attributed to the informal nature of the consultation.

7. The following points were raised during the pre-consultation stage and the Council's response to these is shown below:

Consultee	Issues Raised	Council's Response
HBF; Ashwell	Implications of PPS3 and Delivering Affordable Housing (Nov 06) should be taken on board and the SPD should ensure local policies reflect the requirements of PPS3.	The SPD will wherever possible follow the guidance set out within PPS3, however the SPD supports the Affordable Housing policies contained within the adopted Babergh Local Plan Alteration No.2 (2006) and must therefore hold this in consideration. In circumstances where the SPD cannot reflect PPS3 when having regard to the Babergh Local Plan Alteration No.2 (2006), it is expected that the Local Development Framework will inform new local planning policy guidance and a review of the SPD on Affordable Housing once the LDF documents replace the current Local Plan.
HBF; Ashwell	A Strategic Housing Market Assessment should be completed to inform housing need and this must be carried out in consultation with landowners, developers and interested parties. The draft SPD should not be progressed until the draft SHMA is available.	Babergh District Council completed a SHMA in November 2008 and updated the Housing Needs Survey of 2004 in November 2008. These studies will inform new affordable housing policies to be adopted in DPDs and accordingly a review of the SPD. The SHMA 2008 and Housing Needs Survey 2008 were taken into account during the formulating of the SPD.
Ashwell	There is a need to take into account the timeline of a particular site in agreeing affordable housing on a site-by-site basis.	Affordable housing of up to 35% will be required in accordance with local plan policies. Site factors are taken into account. Viability is considered.
HBF	The SPD should be in	The SPD is in accordance with the LDS.

Consultee	Issues Raised	Council's Response
	accordance with the LDS	
HBF; Ashwell	Affordable housing requirements must take on board the overall viability of schemes (including the likely availability or not of grant funding) including viability of commuted sums. Consideration should be given to any changes in Housing Corporation practice and this should be built into the SPD.	This is acknowledged by indicating that if developers or applicants cite non-viability as the reason for not complying with Policy HS08 and HS09, they must support their case with financial evidence, which they should submit with the application. The SHMA and associated viability assessment indicated that there is a large need for affordable housing in the district and that the existing requirement of (up to) 35% affordable housing can be achieved and that this can be increased to a requirement of 40% affordable housing including for lower thresholds in rural village. The Housing Needs Survey of 2008 also suggested 40% affordable housing contributions.
HBF	The precise mix of affordable dwellings should be a matter of negotiation between developers and the Council. Targets for total provision would be more appropriate than a blanket requirement. The SHMA should inform tenure mix.	The draft SPD in accordance with the Local Plan Policies indicates that tenure mix will be sought in accordance with the most up to date Housing Needs Survey. The SHMA and associated viability assessment indicated that there is a large need for affordable housing in the district and that the existing requirement of (up to) 35% affordable housing can be achieved with a tenure mix of 75% social rent and 25% intermediate housing. The SHMA also indicated that in Babergh this can be increased to a requirement of 40% affordable housing including for lower thresholds in rural villages. Other infrastructure requirements were considered as part of the viability assessment.
HBF	Matters of importance should be set out in a DPD not a SPD and the SPD should be consistent with Local Plan policies. No significant new requirements should be introduced via the SPD.	The SPD reflects adopted Local Plan Policies HS08 and HS09 and therefore it is considered that the content of the draft SPD is appropriate to a SPD document.
HBF; Ashwell	Innovative and new models and ways of delivering affordable housing and viability of affordable housing should be considered. A range of options should be adopted to facilitate delivery including off site contributions. A clear partnering approach between the Council and developers are required if targets in terms of housing is to be met.	Viability is acknowledged by indicating that if developers or applicants cite non-viability as the reason for not complying with Policy HS08 and HS09, they must support their case with financial evidence, which they should submit with the application. In terms of off site contributions, PPS3 supports on site provision in preference to off site contributions; as does the Local Plan and draft SPD.
HBF	The SPD should not replicate, cut across or detrimentally affect matters within the scope of other legislative requirements	Other legislation is not replicated in the SPD, nor does it cut across any other legislation.
HBF	The underlying principles of soundness including considering relevant options are applicable.	The SPD is based upon robust evidence tested at the local plan inquiry including the Housing Needs Survey of 2004. The Local Plan will be reviewed and replaced by the LDF. A robust evidence base will support the LDF including a SHMA, SHLAA and updated Housing Needs Survey. Options considered are set out in the Draft SA report for the draft SPD on Affordable Housing. Findings of the draft

Consultee	Issues Raised	Council's Response
		SHMA and HNS were considering in the formulation of the draft SPD.
HBF	Sustainability Appraisals should equally consider economic, social and environmental impacts of policies.	Equal consideration was given to the economic, social and environmental impacts in the Sustainability Appraisal as can be seen from the methodology adopted in the Scoping Report.
Ashwell	The SPD should not be used in such a way to take the judgement element outside of the application stage of the process and into the pre-applications stage.	The SPD reflects adopted Local Plan Policies HS08 and HS09 and site factors are taken into account.
Ashwell	Key indicators which could be monitored should include: No of units granted planning permission by tenure and provider; No of affordable units completed and their source funding; Financial contributions held , received and spent; Value of free/ discounted land received; Affordable housing provided in accordance with HS09; Affordability of housing provided; Standard and location (integration) of accommodation provided; Provision of affordable housing by size of site; Split between 100% affordable housing and mixed tenure schemes; Split between urban and rural provision; Provision of exception sites.	Noted, these are good suggestions and where appropriate have been incorporated into the monitoring aspects.
Ashwell	The use of cascade mechanisms should be considered to take into account the uncertainty over provision of affordable housing on long-term larger sites. The Council should make their position clear on perpetuity and if this differs from guidance provided by the Housing Corporation. The SPD should address matters such as the recycling of subsidy.	The SPD provides guidance in terms of perpetuity, and recycling of subsidy. Local plan policies require affordable housing in perpetuity.
Ashwell	Low cost market housing can be within the definition of intermediate affordable	PPS3 states that affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. It

Consultee	Issues Raised	Council's Response
	housing within PPS3	furthermore states that homes that do not meet the definition, for example 'low cost market' housing, may not be considered, for planning purposes, as affordable housing.
Ashwell	The SPD should set out guidance on the way in which key worker housing would be addressed.	The Draft Housing Needs Survey of 2008 indicated that key worker housing is not a significant issue within the Babergh District and therefore this is not addressed in the Draft SPD.
Ashwell	There should be sufficient flexibility in the operation of the relevant policies to avoid over focus on the Council's register. Provision should reflect actual and current need including data contained in the SHMA.	The SPD indicates that needs should be reflected in the district and that this information should be obtained from the most up to date Housing Needs Survey, SHMA, Housing Register and if needed local surveys. The SHMA and associated viability assessment tested viability with a tenure mix of 75% social rented and 25% intermediate housing and indicated that 35% affordable housing and even 40% affordable housing can be achieved within the district including in rural areas where lower thresholds would apply.
Ashwell	Developers should be able to bring forward design of quality and range in order to meet demand and service charges may be applicable that impact on affordability.	The same design considerations would apply as in market housing. This is in line with the approach in PPS3 indicating that the commitment to the delivery of high quality housing for people who are unable to access or afford market housing.
Ashwell	Community Infrastructure Levy will have implications for the delivery of affordable housing and authorities should consider this. The SHMA should inform the SPD in terms of this.	The SHMA and associated viability assessment tested viability with a tenure mix of 75% social rented and 25% intermediate housing and indicated that 35% affordable housing and even 40% affordable housing can be achieved within the district including in rural areas where lower thresholds would apply. Provision of infrastructure was considered in the SHMA viability study.
Ashwell	The SPD should make it clear the Councils expectations in regarding to the production of a Section 106 deed. A standard draft agreement should be attached to the SPD for consideration.	Headings to be agreed in S106 Agreements are included in the Draft SPD.
Ashwell	The Council should provide guidance on their preferences in regard to who actually provides the affordable housing.	A list of partner Registered Social Landlords is included in the SPD. Other providers could also be acceptable and this is specified in the Draft SPD.
Ashwell	The SPD should be the catalyst for the Council to produce formal protocol for negotiations with developments which identifies which departments will be involved in the process and at what stages. Such approach should assist in ensuring the site viability matters are informed.	Noted. A checklist is provided as an appendix providing more detail in this regard.
Ashwell	The opportunity should be taken to revisit the issue of grant of S106 sites with the	The Housing Corporation states that no grant (SHG) on planning obligation sites is available unless additionality can be shown.

Consultee	Issues Raised	Council's Response
	Housing Corporation. Further consideration should be given to how any changes in Housing Corporation practice should be built into the SPD. This is particularly pertinent given current market conditions.	
Babergh East LSP	Affordable housing should also be sought in rural areas and for site thresholds lower than 15 dwellings.	Policy HS09 support site size thresholds lower than 15 in villages with a population of less than 3000.

Production Stage (Draft SPD)

8. The following external consultations were undertaken regarding the draft SPD:

- Copies of the draft SPD, together with the draft Sustainability Appraisal Report, Local Plan Policies HS08 and HS09, Notice of the SPD Matters, the pre-production consultation statement and questionnaire were published on the Council's website www.babergh.gov.uk and made available for public inspection during normal office hours from 17 December 2008 to 28 January 2009 at:
 - Babergh District Council Offices, Corks Lane, Hadleigh, Suffolk, IP76SJ;
 - Sudbury Town Hall; Sudbury Advice Centre and Sudbury Library, Market Hill, Sudbury, Suffolk, CO10 1TL;
 - Hadleigh Library, 29 High Street, Hadleigh, Suffolk, IP8 5AG;
 - Long Melford Library, United Reformed Church Room, Hall Street, Melford, Co10 9JJ;
 - Capel St Mary Library, Village Hall, The Street, Capel St Mary, IP9 2EP;
 - Glemsford Library, Village Hall, Glemsford, Suffolk, C010 7RF;
 - Lavenham Library, Lavenham Village Hall, Church Street, Lavenham, Sudbury, Suffolk, C019 9QT; and
 - Great Cornard, Upper School, Head Lane, Great Cornard, C010 0JU.
- An advert publishing the notice of deposit of the draft SPD for consultation (per Appendix 2) was placed in the East Anglian Daily Times on the 16th of December 2008 to ensure that the wider community was aware of the consultation period.
- Statutory consultees and general consultation bodies as set out in Appendix 3 received a letter informing them of the consultation on the draft SPD, and associated draft Sustainability Appraisal.
- Babergh District Council made a request of conformity to with the Regional Spatial Strategy on the 15th of December 2008. A letter of conformity dated the 28th of January 2009 was subsequently received.

9. The following points were raised during the consultation (draft SPD) stage and the Council's responses to these are shown below:

Consultee	Issue Raised	Babergh Response
East of England Development Agency; Felixstowe Town Council; Newton Parish Council; Highways Agency; Natural England; The Coal Authority; Assington Parish Council	No comments to make on the document.	Noted
Changelaunch Ltd	A Site Submission for Affordable Housing.	Noted. Site submissions will be considered in the Site Specific Allocations DPD not the Affordable Housing SPD.
Nayland with Wissington Parish Council	This Council broadly supports the Draft Affordable Housing Supplementary Planning Document but we wish to be assured that the Housing Corporation Design & Build Standard does accord with the guidelines set by Babergh District Council and that impending changes to Planning Regulations have been taken into consideration.	Noted. This paragraph has been slightly amended to reflect this.
Peter Mantell-Sayer	The authority is urged to ensure that flexibility is also built into that guidance to allow it to remain relevant during the current challenging period. It is therefore vital to ensure that the guidance acts to enable the provision of affordable homes rather than to restrict it.	Noted. Flexibility is built into the policies and this is reflected in the document. Affordable housing of up to 35% will be required/ negotiated in accordance with the adopted affordable housing policies.
	Para 9: The regional target for affordable housing is 35%, this must always be considered in the light of the overall requirement of PPS3 to provide homes. If the effect of planning obligations is to render a site financially unviable, that target must be reviewed on a site by site (This is a target not an absolute requirement.)	Noted. The SPD sets the context by repeating national and regional policy. As indicated affordable housing of up to 35% will be required/ negotiated in accordance with the adopted affordable housing policies. Viability is addressed in the document. Babergh District Council has completed a SHMA and viability assessment. The viability assessment supports 35% and even 40% affordable housing and the tenure mix referred to in the SPD. This is set out in paragraph 14 of the SPD.

Peter Mantell-Sayer	Para 11, 12, 13: Shared equity homes provided to an RSL are a 'white elephant' as there is no take-up in a falling market. It would be better to allow a 'Right to Buy' exercisable at a later date thus allowing the house to be occupied now.	Noted. The SPD indicates that a variation in the mix may be considered if justified in paragraph 10 of the final SPD document. The word "exceptionally" in this paragraph was deleted.
	Para 27: The authority should recognise the fact that many sites have been purchased before the present market collapse and are remaining undeveloped. Therefore this is an unhelpful and unreasonable statement, and could be considered to represent a counter-productive stance.	Not agreed. The SPD refers to contributions and obligations including affordable housing contributions not land values and it is important that developers recognise policies relating to planning obligations. The SPD makes provision for other factors such as viability issues, supported by robust evidence.
	Para 28: RSL's often want to have a discrete site, and there may be many other valid reasons why this would be inappropriate and detrimental to the local community. Decanting affordable housing to a suitable alternative site produces a larger number of plots on a particular area, thus increasing the overall value without increasing the price of individual plots. The Council is therefore urged to consider each site on its merits, rather than be prescriptive	Noted. The SPD makes provision for circumstances where affordable housing cannot be accommodated on site, however this is not the preferred option as stated in the SPD. This is in line with paragraph 29 of PPS3. A reference to RSL interest is included.
Development Control; BDC	Comment related to para 22. The advice represents a step change in the way we are currently working - affordable housing and the approach cited here is inconsistent with the approach taken with contributions for public open space provision which are calculated on the net increase and not applied to 1 for 1 replacement dwellings.	Agreed, amend accordingly.
Suffolk Preservation Society	Para 31 & 32 would benefit from strengthening the commitment to securing the highest standards of design & sustainability. The identification to the sensitivities of developing sites on the edge of built up areas is welcoming. The solutions to deal with problems are identified in a general way, this is a major issue in successfully delivering affordable housing in the district and therefore requires more attention in the SPG. In para 32 can the council identify its own target as to what standard it will expect or accept on terms of sustainable construction. The SPG offers an opportunity to push the standard high across the district.	Noted. The paragraph regarding sensitivities of developing sites on the edges of built up areas have been strengthened. This SPD does not set policy in its own right and higher standards for sustainable construction are issues that will need to be considered in the Local Development Framework and Core Strategy and cannot be addressed in a SPD.

CABE	Design is now well established in planning policy at national and regional levels, and LDFs offer an opportunity to secure high-quality development, of the right type, in the right place, at the right time.	Noted. This SPD does not set policy in its own right and design policies will need to be considered in the Local Development Framework.
	Robust design policies should be included within all LDF documents and the Community Strategy, embedding design as a priority from strategic frameworks to site-specific scales	Noted. This SPD does not set policy in its own right and design policies will need to be considered in the Local Development Framework.
	To take aspiration to implementation, local planning authorities' officers and members should champion good design.	Noted. This SPD does not set policy in its own right and design policies will need to be considered in the Local Development Framework.
	Treat design as a cross-cutting issue – consider how other policy areas relate to urban design, open space management, architectural quality, roads and highways, social infrastructure and the public realm.	Noted. This SPD does not set policy in its own right and design policies will need to be considered in the Local Development Framework.
	Design should reflect understanding of local context, character and aspirations	Noted. This SPD does not set policy in its own right and design policies will need to be considered in the Local Development Framework.
	You should include adequate wording or 'hooks' within your policies that enable you to develop and use other design tools and mechanisms, such as design guides, site briefs, and design codes.	Noted. This SPD does not set policy in its own right and design policies will need to be considered in the Local Development Framework.
Chelmondiston Parish Council	The document was difficult to understand what it was trying to achieve. A statement of the main purposes of affordable housing developments and the risk that these are trying to mitigate would be useful. Try to keep assessment criteria quantifiable and measurable.	This comment refers to the draft SA report. Paragraph 1.1.1 was modified to make the main purpose of affordable housing clearer. Paragraphs 1.2; 1.3, 1.4 and 2.2 explain the purpose of the methodology of the final SA document.
	Para 7: Conflict with stated objectives and reality of anything other than small housing developments. Para 15: Just permitting people to live in areas of their choice will not improve public transport.	This comment refers to the draft SA report. Noted. The objectives have been developed and agreed in the Scoping Report as indicated in 1.4.6. It is about balancing social, economic and environmental objectives and assessing the impacts of alternative options in terms of sustainability. In addition the SA document is an important tool to identify potential significantly negative impacts and to ensure that these can be mitigated.

Chelmondiston Parish Council	Scale of development for affordable housing would be small in comparison with Ganges Housing development. Local people should get the affordable housing first.	Noted. The SPD does not set policy in its own right or makes housing allocations. The comment relates to a site where the principle of development has been established and the merits of sites are not addressed in this document. Criteria for acquiring affordable housing are not considered in the planning policy and the SPD but are addressed through affordable housing requirements.
	Questions the effect of the SPD on various objectives	This comment refers to the draft SA report. Noted. The fourth column in the assessment table, headed 'Nature of effect' clarifies the expected impact the SPD will have on the objectives and indicators.
	In the local plan consider increasing the % of affordable housing up to 40% from 35%. The population figures should be estimated well belong 2006.	Noted. This SPD does not set policy in its own right and higher affordable housing contributions will need to be considered in the Local Development Framework and Core Strategy.
	Has consideration been given to allocating part of a development site for individual or community self build projects as part of the affordable contribution.	Noted. This SPD does not allocate sites for affordable housing and this will have to be addressed in the Site Specific Allocations document.
Ashwell	Delivery needs to be agreed on a site by site basis, subject to identified need. The timeline of the particular site needs to be taken into account. Provision should remain relevant throughout the scheme.	Noted. Planning applications is considered on a site by site basis and the policy and SPD makes provision for affordable housing to be required/ negotiated of up to 35% and refers to proven or identified need. Viability is addressed in the document.
	The issue of grants on S.106 sites should be revisited with Homes & Community Agency. Consideration should be given to changes in Home & Community Agency practice and built into the SPD.	There are ongoing discussions with the HCA and the outcomes of these discussions have been incorporated into the draft SPD and final SPD document. The document has been amended to reflect viability in paragraph 39 of the final document.
	Cascade mechanisms should be considered to take into account the uncertainty over provision of affordable housing on long-term larger sites. They can assist in managing changes to the Housing Market.	Noted, however flexibility is built into the policies and this is reflected in the document. Affordable housing of up to 35% will be required/ negotiated. Viability is addressed in the document.

Ashwell	The council should make clear their position on perpetuity. The SPD should not seek to "prescribe" a set tenure mix.	Noted. The Council's position regarding perpetuity is set out in paragraph 9 of the final SPD. The SPD indicates that tenure mixes will be sought in accordance with evidence on need and demands. In addition the SPD makes provision for exceptional circumstances. This is in accordance with the adopted policies.
	The SPD should not be a prescriptive and should allow the circumstances of each PA to be considered on their own merits.	Noted. The SPD allows for flexibility and exceptions and are in accordance with the adopted policies.
	The SPD should not include a prescriptive tenure split. The actual tenure split which might apply to a particular site is something to be settled at the application stage, taking into account SHMA	Not agreed. As is the case with the policy the SPD indicates that tenure mixes will be based on the most up to date evidence regarding proven local need and demand. In addition the SPD makes provision for exceptional circumstances as included in the policy. The tenure mixes mentioned are supported in the SHMA including in the viability assessment of the SHMA.
	Opportunity should be taken in the draft SPD to set out guidance on the way in which key worker housing on any site is addressed.	Noted. The Housing Needs Survey for 2008 shows that there is little evidence of need for key worker housing that exists within the Babergh District and therefore this is not addressed in the SPD.
	In the context of the application by application dialogue between the Council and developer, account should be taken so that affordable housing is located in developments which are genuinely more affordable, including estate charges. Given current market conditions there may be a need to review the applicability of scheme development standards as well as Code aspirations.	Noted. The SPD refers to RSL input and affordability. Although viability might be more of a consideration in an economic recession housing standards and design should not be compromised on, this view is supported by the HCA and national government. A slight amendment to the wording of this paragraph was also introduced. The SPD makes provision for circumstances where affordable housing cannot be accommodated on site. Viability is addressed in the document.

Ashwell	<p>It is appropriate that there is recognition of the possibility of a commuted payment in lieu of on site provision. However, the commuted sum contribution should be linked to overall viability on any particular scheme. The SPD should take the opportunity to make the Council's position clear on both these issues. It would be preferable to see any SPD on affordable housing adopting a range of options to facilitate delivery.</p>	<p>Noted. Viability is dealt with as part of the amount of affordable housing to be sought. The policy and SPD makes provision for affordable housing to be required/ negotiated of up to 35%. Developers/ agents need to provide evidence in terms of viability if it is argued that affordable housing cannot be provided as a result of the viability of the scheme.</p>
	<p>Given the current timetable and the need to underpin any SPD with a robust SHMA it may be worth deferring the SPD until a more appropriate time?</p>	<p>Not agreed, the SPD supports adopted policies and these policies allows for flexibility. In addition Babergh District Council in conjuncture with several other councils in Suffolk has completed a SHMA and viability assessment. The viability assessment for the Babergh District supports 35% and even 40% affordable housing and a tenure mix of 75% social rented and 25% intermediate Affordable Housing. This information is provided in paragraph 14 of the SPD.</p>
	<p>The SPD should make it clear the Council's expectations in regard to the production of the S106 deed. A standard draft agreement should be attached to the SPD for consideration.</p>	<p>Noted, however the standard heads of terms for a Section106 Agreement is attached in Appendix E of the SPD. This makes the Council's expectations clear.</p>
	<p>The SPD could be the catalyst for the Council to produce a "formal protocol" for negotiation with developers which identifies which departments will be involved in the process and at what stages. Such an approach should assist in ensuring that site viability matters are duly informed.</p>	<p>Noted, however Appendix G provides a checklist for the implementation of Policies HS08 and HS09 and indicates which departments/ sections are involved.</p>
	<p>It is recognized that there is a regional target for housing as set out in the recently adopted East of England Plan and that in turn BDC has its own objectives. At a time when the region needs to deliver a step change in housing provision there is a considerable slow down in the market, the need for affordable housing will not decrease dramatically and ways will need to be found to ensure delivery</p>	<p>Noted. This is a relevant point but there is a large need for affordable housing and other routes need to be explored before the % of affordable housing is reduced. Developers/ agents need to provide evidence in terms of viability if it is argued that affordable housing cannot be provided as a result of the viability of the scheme. The policy and SPD makes provision for affordable housing to be required/ negotiated of up to 35%.</p>

EERA	Para' 8 - You may also wish to include a reference to the Housing Green Paper.	Include accordingly
	Para' 9 - The reference should be to RSS policy H2 (and not H3).	Amend accordingly
	Para' 11 - You may wish to refer to the definitions of affordable housing set out in the Housing & Regeneration Act 2008(c.17), par 68	Include accordingly
	Para' 24 - Could the dwellings threshold be set at a lower level?	Noted. The threshold is set out in Policy HS08 and the SPD does not set policy in its own right. Thresholds will have to be considered in the LDF.
	Para 32 - Suggest amending the paragraph, as appropriate, to refer to the Homes and Communities Agency and not the Housing Corporation.	Amend accordingly
	Para 38 - At the end of the first sentence, we suggest that you may want to include an example - "...such as lack of RSL interest."	Include accordingly
	Para 43 - At the end of the first sentence, we suggest including the wording "(if viable)."	Include accordingly
	Glossary - amend the ref to the RSS to reflect the fact that as may 08 this is a adopted doc.	Amend accordingly
Dedham Vale Society	We note that, at para 35 of the draft, three villages within the Dedham Vale AONB, East Bergholt, Nayland and Stratford St Mary, are listed as offering sustainable locations for Affordable Housing.	The SPD does not set policy in its own right and sustainable and unsustainable villages are defined in Policy HS03 of the adopted Local Plan. The SPD repeats this particular policy.
	We assume that para 31 of the draft means that the terms of your policies CRO 1 and CRO 2 would be strictly applied to any proposals for Affordable Housing in these villages or indeed to any proposal for such in the open countryside of the AONB.	Yes the paragraph refers to all design and landscaping policies in the adopted Local Plan.
	We labour this point particularly because our attention has recently been drawn to an example of a new build only a few miles north of Babergh District where no attention whatever has been paid to the local vernacular or landscape quality.	Noted. The SPD refers to the need to comply with design and landscaping policies. In addition a proposal will be evaluated in terms of all other policies in the Local Plan as well as national and regional guidance to determine if the proposal is acceptable.

Sudbury & District Chamber of Commerce	The Chamber of Commerce welcome the support given within the Draft Affordable Housing SPD for affordable housing to be provided within the area through developer contribution. There is however concern that, in the short term, the target of 35% social housing allocation may lead to delay in the commencement of development around Sudbury if a flexible approach is not taken to the open book accounting provided for.	Noted. This is a relevant point but the policy and SPD makes provision for flexibility and up to 35% affordable housing will be required/ negotiated. There is a large need for affordable housing and other routes need to be explored before the % of affordable housing is reduced. Developers/ agents need to provide evidence in terms of viability if it is argued that affordable housing cannot be provided as a result of the viability of the scheme.
	The percentage of Affordable Housing needs to take account of the current need to get developers building in the short to medium term and to avoid delays to developments until even better economic circumstances justify the more recently introduced higher Social Housing Allocation.	Noted. This is a relevant point but the policy and SPD makes provision for flexibility and up to 35% affordable housing will be required/ negotiated. There is a large need for affordable housing and other routes need to be explored before the % of affordable housing is reduced.
	Overall therefore, the need to encourage jobs and activity should temper the provision of Affordable Housing within developments until a more active market is developed, assuming that business will respond to such incentives.	Noted. This is a relevant point but the policy and SPD makes provision for flexibility and up to 35% affordable housing will be required/ negotiated. There is a large need for affordable housing and other routes need to be explored before the % of affordable housing is reduced.
Level Ltd	The Council has no evidence that an affordable housing target of up to 35% may be viable. We are concerned that this draft SPD does not contain the necessary flexibility to meet actual housing need in the District as required by PPS12. The SPD should refer to the 2004 Housing Needs Survey	Not agreed. The SPD is in accordance with adopted policies in the Local Plan and do not set out policy in its own right. The SPD provides background to the recently completed evidence base including the SHMA which indicates that 35% affordable housing and even 40% affordable housing may be viable within the Babergh District as stated in paragraph 14 of the SPD. The policy leaves flexibility indicating that up to 35% affordable housing will be required/ negotiated. Viability is addressed in the document.

Levvel Ltd	Tenure splits should be considered alongside the proposed scheme at the time it comes forward for development. The mix and tenure should be negotiated between the Council and the developer. The Council should adopt a flexible approach when interpreting particular mixes of tenure to take account of issues of sustainability, needs and viability. Levvel supports the introduction of different tenure splits and reduction in the 35% quota in order to increase scheme viability.	Not agreed, however include reference to other factors paragraph 5 to allow for additional considerations as specified in the adopted policies. The SPD indicates that tenure mixes will be sought in accordance with evidence on need and demands. In addition the SPD makes provision for exceptional circumstances. This is in accordance with the adopted policies.
	We ask that the council what work is being done to assess the impact of its AH SPD on the delivery of all housing. The question should be addressed qualitatively in terms of whether affordable housing policy is likely to inhibit or encourage development but also quantitatively, in terms of the size of the impact on delivery. The draft SPD should clearly state that if it is not economically viable to deliver a 35% target, a reduced level of affordable housing should apply.	Not agreed. It should be noted that the SPD does not set policy but that it provides the details for the implementation of the adopted Local Plan Policies. The policy (and this is repeated in the SPD) makes provision for flexibility as affordable housing of up to 35% will be required/ negotiated. Delivery is a relevant point but there is a large need for affordable housing and other routes need to be explored before the % of affordable housing is reduced. The SPD makes provision for viability and indicates that developers/ agents need to provide evidence in terms of viability if it is argued that affordable housing cannot be provided as a result of the viability of the scheme.
	The definition of affordable housing at para 11 is replaced with the definition contained in PPS3 at Annexe B.	Noted. This is addressed in the document and discussed in some detail in paragraph 8 which states that the definition in the Local Plan should be read as the definitions in PPS3 to include “social rented and intermediate housing provided to specified eligible households whose needs are not met by the market.”
	Sheltered schemes and the viability of these schemes should be considered separately	Not agreed. Viability is dealt with in the SPD. Developers/ agents need to provide evidence in terms of viability if it is argued that affordable housing cannot be provided as a result of the viability of the scheme.

Levvel Ltd	Where exceptional circumstances require a viability exercise to be carried out on a particular site in order to determine whether it can deliver affordable housing, the appraisal should be based upon agreed generic costs in order to protect commercially sensitive data and to ensure that the permission is attached to the label not the developer.	A paragraph was included referring to commercially sensitive data and how this will be dealt with.
	The paragraph on Integration and Mix of Housing should refer to service charges and management.	Not agreed. The SPD already refers to RSL input and affordability.
	It is recommended that the SPD include the formula on calculating the developer subsidy above in order to provide clarity, certainty, effective provision and to avoid planning through appeal.	Noted. The SPD includes a formula for calculating Commuted Sums and the Policies (and repeated in the SPD) specifies the amount of affordable housing to be sought/ negotiated.
	The Council should remove the commuted sum formula in para 40 as it does not meet the requirements of Circular 05/05 and PPS3. It fails to correspond to the principle of equivalence as it would lead to a different level of subsidy on-site when compared to an off-site commuted sum.	Not agreed. The previous comment of this objector indicated that a formula for calculating a commuted sum should be included in the SPD. It is considered that the formula accords with the tests set out in Circular 05/05 and PPS3 that indicates “that a financial contribution in lieu of an on-site provision (of broadly equivalent value) may be accepted”. This does not refer to discounts for affordable housing as suggested by Levvel Ltd. The values are based on categories of plots and different areas within the district. The RSL build costs are based on averages.
	The monitoring should be kept up to date in real time rather than annually and should be publicly available.	Noted. Annual Monitoring Reports are produced on an annual basis in accordance with PPS12. The reports are published on the Council’s website. Levvel Ltd refers to the Policy, however this document is not policy nor does it set out policy in its own right.

Levvel Ltd	The issue of grant availability has not been sufficiently dealt with by the AH SPD. The AH SPD target of 35% affordable housing is then not viable as this policy would be implemented on a 'no grant' basis. We recommend that the Council should consider the affect of grant funding on viability in the district.	The paragraph has been amended to include a reference to viability. The SPD does not set policy but it provides the details for the implementation of the adopted Local Plan Policies. The policy (and this is repeated in the SPD) makes provision for flexibility as affordable housing of up to 35% will be required/ negotiated. A SHMA has been completed. The viability assessment supports 35% affordable housing and even up to 40% affordable housing in the Babergh District and the tenure mix referred to in the SPD without grant funding. This is set out in paragraph 14 of the SPD.
Shotley Parish Council	Appendix C - Population Estimates only project the 2001 Census figures to mid 2006. Surely the estimates should reflect the forward planning period i.e. up to at least 2016	Not agreed as the population figures referred to in policies HS08 and HS09 will be existing figures and not projected figures. Population estimates beyond 2006 is not available at present. If and when new figures are available this will be updated.
	An amendment to the Local Plan should perhaps be made increasing the percentage of affordable houses to 40% from 35% in line with your Housing Needs Survey 2008	Noted. The SPD does not set policy in its own right and amendments to Affordable Housing targets should be addressed in the LDF and Core Strategy.
	We believe consideration should be given to using part of the commuted sums income to provide Foyer type facilities	Noted. This comment is too detailed to address in the SPD.
	For HS09 sites we would like to see full consultation with the local community on percentage, mix, integration and location. There also needs to be more transparency on tracking the application of funds from commuted sums	Consultations regarding planning applications take place in accordance with the Statement of Community Involvement. Similarly the Council will consult Parish Councils and Local Communities regarding the Local Development Framework that will set out new policies for Affordable Housing.
	Is it possible to allocate part of a development site for individual or community self build as part of the affordable contribution?	The SPD does not deal with site specific allocations. This will be dealt with in the Site Specific Allocations DPD.
	Pre planning advice should include reference to Parish Plans and Local Design statements where they are available	Reference included.

Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) Consultation

10. In addition to the consultations outlined above and prior to its use the draft Babergh Scoping Document on SPDs was sent to the three statutory consultees; Natural England, The Environment Agency and English Heritage as well as wildlife and nature conservation groups such as the RSPB and Suffolk Wildlife Trust. Other organisations including the East of England Development Agency, Suffolk Development Agency, the Police, several sections of the County Council, the Woodland Trust and a representative of faith groups have been consulted as well.

11. The responses to the consultation resulted in the scoping report and baseline information being updated and amended to ensure that the objectives, data and approach was as up to date as possible and that it met the statutory requirements. These changes were not wide ranging and generally minor in nature as the evolution of the document had been coordinated with the statutory organisations during its development. More information on what issues were raised and how these were addressed are contained in the adopted Scoping Report. Comments regarding the draft sustainability appraisal report are addressed in the table above.

Appendix 1: Statement of Compliance with the SCI

Pre-Production	
Specialist Agencies	Forwarded pre-production document to RSLs to provide opportunity for comment
Development Interests	Letters sent to Major Planning Agents, HBF to provide opportunity for comment
Local Groups that may hold information	Published on website
LSPs	Letters sent to LSPs inviting comments
Production	
Place advertisement	Place advertisement on 16 December 2008 in East Anglian Daily Times.
Town/ Parish Councils	Sent letters to inform of consultation and where documents can be viewed.
Specific Consultees	Sent letters to inform of consultation and where documents can be viewed.
General Consultees including Hard to Reach Groups	Sent letters to inform of consultation and where documents can be viewed.
LSPs	Sent letters to inform of consultation and where documents can be viewed.
General Public	Place advertisement and publish documents on website; Sent letters to everyone on the LDF database to inform of consultation and where documents can be viewed.

Appendix 2: Newspaper Advertisement of Draft SPD published in the East Anglia Daily Times on 16 December 2008

BABERGH DISTRICT COUNCIL

PLANNING AND COMPULSORY PURCHASE ACT 2004

Town and Country Planning (Local Development) (England) Regulations 2004

DRAFT AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

Notice of Regulation 17 Public Participation

Babergh District Council has prepared a **Draft Affordable Housing Supplementary Planning Document (SPD)** for formal public participation under Regulation 17 of the above Regulations. The Affordable Housing SPD, which forms part of the Babergh Local Development Framework (LDF), provides detailed advice regarding the implementation of affordable housing Policies HS08 and HS09 of the Babergh Local Plan, Alteration No 2. It is accompanied by the Affordable Housing **Draft Sustainability Appraisal (SA)**, which considers the environmental, economic and social impacts of the SPD, **Statement of Matters** and **Consultation Statement**. The Local Development Framework will form the basis for decisions on spatial planning within Babergh.

The Council is consulting the public on the draft Affordable Housing SPD and Draft Sustainability Appraisal to ensure that all participants in this process have an opportunity to make their views known. **The consultation period runs from 17 December 2008 to the 28th January 2009.**

Copies of the draft SPD document and accompanying Draft Sustainability Appraisal as well as the Notice of the SPD Matters and Consultation Statement are available for public inspection, free of charge, from 17 December 2008 on the Council's web site www.babergh.gov.uk and at the following locations during normal opening hours:

- Babergh District Council, Council Offices, Corks Lane, Hadleigh, Ipswich, IP7 6SJ
- Sudbury Town Hall; Sudbury Business Advice Centre and Library, Old Market Place, Sudbury, CO10 1TL
- Hadleigh Library, 29 High Street, Hadleigh, IP8 5AG, Long Melford, United Reformed Church Room, Hall Street, Melford, CO10 9JJ, Capel St Mary Library, Village Hall, The Street, Capel St Mary, IP9 2EP, Glemsford Library, Village Hall, Glemsford, CO10 7RF, Lavenham Library, Lavenham Village Hall, Church Street, Lavenham, CO10 9QT, Great Cornard Library, Upper School, Head Lane, Great Cornard, CO10 0JU.

These documents may be downloaded from the above website free of charge.

Please send your comments in support of or in objection to the Draft Affordable Housing SPD and Draft Sustainability Appraisal by electronic means wherever possible via our online consultation process. If you are unable to use electronic methods you can also comment by post to the Planning Policy Section, Babergh District Council, Council Offices, Corks Lane, Hadleigh, Ipswich, IP7 6SJ. If you have any queries, telephone 01473 825712 or email ldf@babergh.gov.uk. **Your comments must be received by 5pm on the 28th January 2009.** Please note that comments cannot be treated as confidential.

In making a response to the SPD, a request may also be made to be notified at a specified address when the SPD has been adopted.

Rich Cooke, Development Plan Manager, Babergh District Council, Council Offices, Corks Lane, Hadleigh, IPSWICH, IP7 6SJ

Appendix 3: List of Consultation Bodies/ Individuals

Specific Consultation Bodies

Acton Parish Council	Monks Eleigh Parish Council
Aldham Parish Council	Nacton Parish Council
Alpheton Parish Council	Nayland with Wissington Parish Council
Alphamstone & Lamarsh Parish Council	Nedging with Naughton Parish Council
Ardleigh Parish Council	Newton Parish Council
Ashen Parish Council	Offton & Willisham Parish Council
Assington Parish Council	Pentlow Parish Council
Battisford Parish Council	Pinewood Parish Council
Belstead Parish Council	Polstead Parish Council
Bentley Parish Council	Preston St Mary Parish Council
Bildeston Parish Council	Ramsey & Parkeston Parish Council
Boxford Parish Council	Rattlesden Parish Council
Boxted Parish Council	Raydon Parish Council
Borley Parish Council	Ringshall Parish Council
Bradfield St Clare Parish Council	Semer Parish Council
Bradfield Combust With Stanningfield Parish Council	Shelley Parish Meeting
Brantham Parish Council	Shimpling Parish Council
Brent Eleigh Parish Council	Shotley Parish Council
Brettenham Parish Council	Somersham Parish Council
Brockley Parish Council	Somerton Parish Meeting
Bulmer Parish Council	Sproughton Parish Council
Bures Hamlet Parish Council	Stanstead Parish Council
Bures St Mary Parish Council	Stoke by Nayland Parish Council
Burstall Parish Council	Stratford St Mary Parish Council
Buxhall Parish Council	Stutton Parish Council
Capel St Mary Parish Council	Sudbury Town Council
Cavendish Parish Council	Tattingstone Parish Council
Chattisham and Hintlesham Parish Council	Thorpe Morieux Parish Council
Chelmondiston Parish Council	Trimley St Martin Parish Council
Chelsworth Parish Meeting	Trimley St Mary Parish Council
Chilton Parish Council	Wattisham Parish Council
Cockfield Parish Council	Wenham Magna Parish Meeting
Combs Parish Council	Wenham Parva Parish Meeting
Copdock and Washbrook Parish Council	Whatfield Parish Council
Dedham Parish Council	Whepstead Parish Council
East Bergholt Parish Council	Wherstead Parish Council
Edwardstone Parish Council	Wormingford Parish Council
Elmsett Parish Council	Wrabness Parish Council
Erwarton Parish Meeting	Woolverstone Parish Council
Felixstowe Town Council	Braintree District Council
Felsham Parish Council	Borough of St Edmundsbury
Flowton Parish Council	Colchester Borough Council
Fordham Parish Council	Essex County Council
Foxearth & Liston Parish Council	Forest Heath District Council
Freston Parish Council	Ipswich Borough Council
Glemsford Parish Council	Mid Suffolk District Council
Great Bricett Parish Council	Suffolk Coastal District Council
Great Cornard Parish Council	Suffolk County Council
Great Finborough Parish Council	St Edmundsbury Borough Council
Gt Henny, Lt Henny, Middleton & Twinstead P C	Tendring District Council
Great Horkesley Parish Council	Age Concern Suffolk

Gt Waldingfield Parish Council	Anglian Water Services Ltd
Groton Parish Council	British Telecom
Hadleigh Town Council	Central Suffolk PCT
Harkstead Parish Council	Civil Aviation Authority
Hartest Parish Council	Defence Estates, Waterbeach
Harwich Town Council	Department of Trade and Industry
Hawkedon Parish Council	Defra
Hawstead Parish Council	East of England Development Agency
Higham Parish Meeting	East of England Regional Assembly
Hitcham Parish Council	East Suffolk Health Services
Holbrook Parish Council	EDF
Holton St Mary Parish Council	English Heritage
Kersey Parish Council	English Nature
Kettlebaston Parish Council	Environment Agency
Langham Parish Council	Essex & Suffolk Water
Lavenham Parish Council	Go-East
Lawford Parish Council	Health and Safety Executive
Lawshall Parish Council	Highways Agency
Layham Parish Council	Home Builders Federation
Leavenheath Parish Council	Ipswich PCT
Levington & Stratton Parish Councils	Ministry of Defence
Lindsey Parish Council	National Grid Transco
Little Cornard Parish Council	Network Rail
Little Finborough Parish Council	Norfolk, Suffolk & Cambridgeshire Strategic H A
Little Horkesley Parish Council	Office of Government Commerce
Little Waldingfield Parish Council	Powergen
Long Melford Parish Council	The Planning Inspectorate
Manningtree Town Council	The Countryside Agency
Milden Parish Meeting	West Suffolk Health PCT
Mistley Parish Council	West Suffolk Hospitals NHS Trust

General Consultation Bodies

ABP Port of Ipswich	MENCAP Sudbury
Age Concern	Menta
AFC Sudbury	Mobile Operators Association
Anglia Business Solutions	Mulleys Motorways Ltd
Anglia Housing Association Group	National Playing Fields Association
Babergh Communities Together	Network Colchester
Babergh Tenant's Forum	National Grid Transco Plc
Beestons Ltd	National Farmers Union Suffolk Country Branch
BLS Enterprises Ltd	National Trust
Boxford Society	Nayland with Wissington Conservation Society
British Horse Society	New Horizons
Bury Volunteer Centre	NFU Ipswich
CABE	NFU Mutual East Anglian Region
Carters Coach Services	NFU Sudbury Branch
Central Suffolk Primary Care Trust	Pinebrook Residents Association
Church Commissioners	Pin Mill Preservation Society
Club 88	Pin Mill Sailing Club
Colne Stour Countryside Association	Pin Mill Society
Community Education Office	Police Architectural Liaison Officer
Commission for Racial Equality	Rail Freight Group
Connexions	Ramblers Association (East)
Cornard Tye Residents Association	Road Haulage Association Ltd
Country Landowners Association	Royal British Legion

CPRE	Royal Harwich Yacht Club
Crown Estate Office	Royal Mail Group
D.A.S.H.	RSPB Eastern England Office
Dedham Vale AONB & Stour Valley Project	RSPB Stour Estuary and Wolves Wood
Dedham Vale Society	RTPI East of England Branch
Department of Culture Media & Sport	RTPI Library and Information Centre
Disabled Persons Transport Advisory Commission	SAVO
East Bergholt Society	Shotley Sailing Club
East LSP	Shotley Youth & Community Project
Equal Opportunities Commission	Sport England
External Partnerships Manager	Sproughton Ramblers
First (Eastern Counties)	St Edmundsbury & Ipswich Diocesan Board of Finance
Forestry Commission	Stoke Park Residents Association
Freight Transport Association	Sudbury Common Land Charity
Friends of the Earth	Sudbury & District Chamber of Commerce
Galloway European Coachlines Ltd	Sudbury & District Ramblers Association
Gemini Travel of Ipswich	Sudbury Educational & Training Trust
Gipping Valley Countryside Project	Sudbury-Marks Tey Rail Users Association
Greenways Countryside Project	Sudbury Rowing Club
Hadleigh and District Angling Society	Sudbury Rugby Club
Hadleigh Community Transport Group	Suffolk Acre
Hadleigh Chamber of Commerce	Suffolk Association of Local Councils
Hadleigh & District Horticultural Society	Suffolk Chamber of Commerce
Hadleigh Farmers' Agricultural Association	Suffolk Coast & Heaths Unit
Hadleigh Forum	Suffolk College
Hadleigh High School	Suffolk Connect
Hadleigh Police	Suffolk Constabulary
Hadleigh Volunteer Bureau	Suffolk Development Agency
Hadleigh Naturalists Society	Suffolk East Primary Care Trusts
Hadleigh Society	Suffolk Farming & Wildlife Advisory Group Ltd
Hadleigh Young Farmers Club	Suffolk Fire & Rescue Service
Harwich Haven Authority	Suffolk Mills Group
Hastoe Housing Association	Suffolk Police Authority
Haven Gateway Partnership	Suffolk Preservation Society
H C Chambers & Sons Ltd	Suffolk Supporting People Team
Hedingham & District Omnibuses	Suffolk Strategic Partnership
H M Prison Service	Suffolk Wildlife Trust Sudbury & District Local Group
Holbrook High School	Sustrans
Hutchinson Ports UK Ltd	The British Wind Energy Association
Invest East of England	The Forum of Private Business
Ipswich Buses	The Gypsy Council
Ipswich Hospital NHS Trust	The Housing Corporation
Ipswich & Sudbury Enterprise Agency	The Lavenham Society
Green Light Trust	The Post Office
Greenpeace	The Prince's Trust
Lambert Smith Hampton on behalf of HM Prison Service/NOMS	The Showmans Guild of Great Britain
LandMark Information Group Ltd Exeter Office	The Sudbury Society
Lavenham Traders Association	Transco
Lavenham Young Farmers Club	West Suffolk MIND
Lavenham Area Minibus Scheme	Western Suffolk LSP
Learning and Skills Council Suffolk	Woodland Trust
Local Pension Service	Women's National Commission
Long Melford & District Angling Association	Young Suffolk

General Consultees on LDF Database – Agents; Individuals

Addleshaw Goddard	Mr Goodwin
Allison Homes	Mrs Greene
Andrew Martin Associates	Mr Hall
Anthony Blee Consultancy	Mr Hart
Anthony Bowhill & Associates	Mr Haynes
Ashwell Developments Limited	Mr Higton
ATS Property Services	Mr & Mrs Hogger
AWG Property Ltd	Mr Hurley
Bacton Trust	Mr Knowles
Barker Gotelee	Mrs Ling
Barton Willmore	Mrs Lucas
Beane & Wass	Mr May
B Dawson	Mr & Mrs Morley
Bellway Estates	Mr Oliver
Bidwells	Mrs Risley
Birketts	Mr Rolfe
Bloor Homes	Mr Ronald
Bovis Homes	Mr Shelley
Boyer Planning	Mr Smith
British Horse Society	Mr Stark
Carisbrooke Investments	Mr Steward
Carter Jonas	Mrs Street
Centac Ltd	Mark Swift
C E P	Mr G Terry
CgMs	Mr Theadon
Chapman Warren	Mr Wakerly
CIWF	Mr Westwood
Clive Richardson & Associates	Mr White
Colin White Construction	Mr & Mrs Wilson
Consignia	Nathaniel Lichfield & Partners
Crest Nicholson Developments Ltd	Neil Ward Associates
Cromwell Country Homes	Notcutts Ltd
Cushman & Wakefield Healey & Baker	Notcutts Ltd
David Brown and Paul Scarlett	Npower Renewables
David Hicken Associates Ltd	Park House
David Lane Associates	Paul & Company
Davies Arnold Cooper	Peacock & Smith
Denton Hall	Pegasus Planning Group
Development Land & Planning Cons Ltd	Persimmon Homes
Development Planning & Design Services	Planning Issues
Development & Planning Consultants Ltd	Phillips Planning Services Ltd
DevPlan UK	Philip J Conway
Dialogue	Pinnacle Transportation Limited
DTZ Piedad Consulting	Oscar Faber
East of England Co-operative Society Ltd	Quorum Post
Edward Gittins Planning Consultant	Rapleys
Elm Estate Residents Association	Redrow Homes
Elsom Spettigue Associates	Redrow Homes (Eastern) Ltd
Entec UK Ltd	RG Abrey Farms
Eversheds	Robert Turley Associates
Fairview New Homes Plc	Robinson
Farrell Bass Prichard	Robinson & Hall
F A Webb Yacht & Boatbuilder	Roger Prosser
Fenn Wright	Rosegrade Ltd
FPDsavills	Rosemere House

Gerald Eve	Roy Chapman & Sons
Gillespies	Royal Bank of Scotland
GL Hearn Planning	RPS Clouston Ltd
Gotelee & Goldsmith	R P S Nigel Moor
Gough Planning Services	RPS Consultants
Grove & Company	RPS Planning
H Andrews	RPS Planning, Transport and Environment
Harcourt-Powell Chartered Surveyors	Samuel Beadie (Properties) Ltd
Hepher Dixon	Savills
Hodgson Elkington Commercial	SB Surveyors
Home Farm Limited	Sheltered Housing Forum
Hopkins Homes Ltd	Spencer Bird Chartered Surveyors
Huggins & Bromage	Sproughton Tenants Association
Humberts Chartered Surveyors	SSR
Hoopers Architects	Stewart Ross Associates
ICI Corporate Real Estate	Stuart P Reid Planning Services
Indigo Planning Limited	Strutt & Parker
Januaries	Suffolk College
J Hancock & Associates	Summers Wykes-Sneyd
Jones Lang Wooton	Sworders
Jon Etchells Consulting	Tarmac Heavy Building Materials Division (UK) Ltd
John H Taylor Farmers	Taylor Vinters Solicitors
John Peacock Planning	Tetlow King Planning
John Popham	The D & M Planning Partnership
Kember Loudon Williams	The Development Planning Partnership
Kerseys Solicitors	The Johnson Dennehy Planning Partnership
Lacy Scott and Knight	The Inland Waterways Association
Level	The Planning Bureau Limited
Leith Planning	Theodore Goddard
Lidl UK	Tim Harbord Associates
Littman Robeson	Tolhurst Fisher
Mayer Brown Limited	Town Planning Consultancy
Morbaine Ltd	Trustees of H W de Zoete Will Trust
Mr Apter	Turley Associates
Mr Baker	Vincent and Gorbing Planning Associates
Mr Bakewell	Weatherall Green & Smith
Mr Bourke	Whymark & Moulton
Mr Boyles	White Cottage
Mr Bunbury	Wild Boar Properties
M Chisnall & Sons	William H Brown
Mr & Mrs Crawford	Willett & Co
Mr Eaves	Wincer Kievenaar Partnership
Mr Emmett	Woodhall Properties Ltd
Mr & Mrs Emeny	Worledge and Nott

Appendix 4: Letter of Conformity EERA



2004-2005
Supporting People
2006-2007
Waste and Recycling
2006-2007
Culture and Sport for
Hard to Reach Groups

Malcolm Firth B.Sc. MCIEH

Head of Natural and Built Environment

Babergh District Council

Corks Lane, Hadleigh, Ipswich IP7 6SJ

DX NO: 85055 Exchange: Babergh
Website: www.babergh.gov.uk

East of England Regional Assembly
Flempton House
Flempton
Bury St Edmunds
Suffolk
IP28 6EG

Your Ref:
My Ref:

Please ask for: Sylvia Stannard
Phone Direct Line: **01473 825712** ☎
Fax: 01473 825738
Email: sylvia.stannard@babergh.gov.uk

15 December 2008

PLANNING AND COMPULSORY PURCHASE ACT 2004

Town and Country Planning (Local Development) (England) Regulations 2004, Regulation 24(2) (b) - Conformity with Regional Strategy

Draft Affordable Housing Supplementary Planning Document

Please find attached a copy of the Draft Affordable Housing Supplementary Planning Document and associated Draft Sustainability Appraisal. The Council is hereby requesting a certificate of conformity with the Regional Spatial Strategy in accordance with Regulation 24 (2) (b). Please note that the consultation period runs from the 17th of December 2008 to the 28th of January 2009.

If you would like any further information on this matter, please do not hesitate to contact the Planning Policy Team on 01473 825712 or email: ldf@babergh.gov.uk.

Yours sincerely,

Sylvia Stannard
Principal Planning Officer, Babergh District Council