

Strategic Planning Policy Team
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Our Ref: BMSDC/SPD/BD

Date: 20th June 2024

Dear The Strategic Planning Policy Team,

Re: Housing SPD Consultation

Persimmon Homes Suffolk welcomes the draft joint Supplementary Planning Documents (SPD) and the opportunity to partake in the consultation to provide feedback on further improving the documents. We have given great consideration to the Housing SPD (draft), considering the guidance alongside national guidance and policy and industry realities.

For ease of reference, specific comments are provided under subheadings relating to the SPD's paragraph numbers in numerical order.

Para 2.1.13

Clarification is required to understand the Council's point here; is the Council seeking that studies should meet the National Described Space Standards of a bedroom? What is the justification for the Council to require that studies should be of such a size?

We would ask the Council to reconsider the impact to schemes if "1 bed units should be in clusters of no more than 6" as this could cause difficulties in creating coherent and efficient schemes, especially for schemes that may make use of bungalows or apartment blocks.

Para 2.2.2 – 2.2.4

There is discrepancy between whether the percentage of affordable housing is set or is a minimum; the wording is confusing here. There needs to be clarity on how the Council will request housing above the 25% or 35% and what will be the justification for a request above the 25% and 35%. These uncertainties will cause viability issues for Applicants which will inevitably slow down the bringing development forward.

Para 2.2.9 – 2.2.10

Persimmon Homes Suffolk request that the Council seeks to be dynamic in their preferred Affordable



Housing Mix to ensure that there is capability to adapt to the changing market. Flexibility in offering other types of Affordable Housing will help deliverability of schemes and therefore more Affordable Housing too.

Para 2.2.17

Persimmon Homes Suffolk queries what would happen if this format was not able to be adhered to, is there any flexibility in exceptional circumstances?

Para 2.2.18 and 2.2.21

A clear calculation needs to be provided to avoid any doubt or disagreements on what is classified as surplus. This will also allow Applicants to calculate viability of scheme.

Para 2.2.24

The Council state that "Affordable housing is not to be clustered in less desirable parts of Sites" but the SPD does not then give a definition of what would be considered as less desirable. Without a definition this is left open to interpretation, what one person might find less desirable another person might find desirable.

Para 4.3.2

"transferred" should not be included in this point as there are often occasions where a Registered Provider cannot be found or the contracts are taking longer than expected and so there could be an unnecessary delay to delivering open market houses.

Para 4.6.2 – 4.6.4

Are Housebuilders restricted to the Council's list of Registered Provider? There should be flexibility for the Housebuilders to choose a Registered Provider and an understanding of the current market for Registered Providers.

Are the Council's preferred Registered Providers currently seeking Affordable Housing provisions at this time?

Para 5.1.6

Housebuilder house types may not support this Principle and Persimmon Homes Suffolk ask for the justification behind a downstairs shower room.

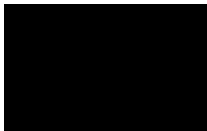
Overall, Persimmon Homes Suffolk would seek more flexibility in this SPD and to reflect the changing trends in the affordable housing sector. This SPD does not include how the Council would adapt to the ever changing environment; this SPD needs to go further to demonstrate how issues can be resolved in order to maintain housing supply. There needs to be flexibility in tenure delivery and cascades where Registered Providers are unable to proceed to offer/contract on reasonable commercial terms.

Tel: [REDACTED]

Lastly, there is also little in here on First Homes. There needs to be clear guidance on this, the Council's policy position, income caps, discount levels and OMV caps. These will effect viabilities for Housebuilders and therefore effect deliverability of sites.

We look forward to seeing the revised SPD and welcome any further discission towards its creation.

Yours sincerely,



Beth Deacon
Planner
Persimmon Homes Suffolk

