

**West Suffolk Affordable Housing
Supplementary Planning Document
Consultation Statement**

April 2026

Contents

1. Introduction.....	2
2. Consultation.....	3
3. Who was consulted?.....	5
Appendix 1: Schedule of comments received and recommended responses to the Consultation Draft Affordable Housing Supplementary Planning Document.	0

1. Introduction

- 1.1. The West Suffolk Affordable Housing Supplementary Planning Document (SPD) supports and gives further advice on the implementation of policies relating to the delivery of affordable housing in the adopted West Suffolk Local Plan 2024 to 2041.
- 1.2. The SPD aims to help all parties involved in the delivery and development of new affordable homes such as developers, landowners, agents and registered providers by providing greater clarity and certainty on the council's policies and requirements. The SPD will assist the development management process including through the pre-application stage to help ensure policy compliant development proposals.
- 1.3. This consultation statement was produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It outlines the consultation process which took place for six weeks between 6 January and 17 February 2026 on the draft SPD, the comments received, the Councils response and any subsequent amendments to the SPD.
- 1.4. The consultation was carried out in accordance with the council's adopted [statement of community involvement](#).

2. Consultation

2.1. The consultation sought views on the scope and content of the supplementary planning document (SPD) and was carried out primarily through the councils online consultation system hosted on the West Suffolk Council Website Planning Policy pages.

2.2. Methods of consultation included:

- Making the SPD available for comment on the council website.
- Making hard copies available for inspection at council offices.
- Sending emails to consultation bodies and interested individuals on the councils local plan and strategic housing databases.
- Promoting the consultation on the councils social media sites.

2.3. At the close of consultation, a total of some 57 comments were received from 18 respondents on the content of the draft SPD.

2.4. A summary of some of the main issues raised during the consultation and the councils response are outlined below:

- Several comments focussed on the changes proposed in the consultation draft National Planning Policy Framework (NPPF).

Response: As the revised NPPF is still at the consultation stage and may be subject to amendment before publication of the final version it was not felt appropriate to amend the SPD in line with the draft NPPF. Furthermore, the SPD provides further guidance on affordable housing policies in the adopted local plan prepared under the previous NPPF. It was considered that any changes to affordable housing policies necessary to reflect the new NPPF could be undertaken as part of the preparation of the new local plan.

- A number of concerns were raised regarding the council's policy requirements regarding the percentage levels of affordable housing, phasing, tenure mix and review mechanisms citing the current challenging economic climate, rises in construction costs, higher planning obligation costs and increased regulation as reasons to be flexible when applying policy.

Response: It is considered the SPD adequately address circumstances where variations to the policy requirement are sought on viability grounds and no change was considered necessary to the SPD.

- Flexibility was requested around the 15 dwelling affordable cluster size and tenure mix by several respondents.

Response: It is considered the SPD allows flexibility and where an exception is required for cases to be considered on a site-by-site basis. It is encouraged to hold detailed discussions around clustering, tenure and mix with the Strategic Housing Team early in

the planning process to ensure that a timely agreement on the distribution and mix of affordable housing can be made.

- The issue was raised that the requirement for all new homes to be built to M4(2) accessible and adaptable standard has considerable management and maintenance consequences for affordable low rise flatted blocks as the installation of a lift may make these unviable for many registered providers (RPs).

Response: Additional text was added to address this issue and to clarify the council's preference for M4(3)b wheelchair accessible dwellings where a need is identified.

- 2.5. Appendix 1 of this statement contains a schedule of all the comments received, the council response and any amendments made. The full text of the responses can be seen on the [councils website](#).

3. Who was consulted?

3.1. The following organisations and groups were consulted on the draft SPD:

- Elected members
- Local MPs
- West Suffolk Parish and Town Councils
- Suffolk County Council
- Neighbouring local authorities
- Developers, landowners and agents
- Adjoining parish and town councils
- Statutory consultees
- Registered housing providers
- Those who had registered an interest in housing and supplementary planning documents on the council's online consultation system.

3.2. Approximately 975 emails were sent informing groups, bodies and individuals of the consultation.

Appendix 1: Schedule of comments received and recommended responses to the Consultation Draft Affordable Housing Supplementary Planning Document.

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
Introduction	Use Traditional Architecture Design Codes as outlined in depth in my original PDF Umbrella Representation which details the strong economic, ecological and environmental reasons for this.	Use Traditional Architecture Design Codes as outlined in depth in my original PDF Umbrella Representation which details the strong economic, ecological and environmental reasons for this. There are many additional solutions provided which has been supported by leading academics and architects also across the UK and the globe.	Mr Community Campaigner David Barton	The West Suffolk Local Plan includes a suite of policies on climate change and design including LP1 sustainable design and construction, SP4 Design, LP9 well-designed places and LP11 Design codes which address the issues raised. The comments submitted do not directly relate to the SPD. No change to the SPD is considered necessary.
Introduction	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its	Natural England (Natural England)	Noted

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		<p>impact on the natural environment, then, please consult Natural England again.</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>		
Introduction	I can confirm that while we do not have any specific comments to make at this stage, we would be interested in receiving future consultations on this and related projects.	Thank you for consulting us on the Council's West Suffolk Affordable Housing Supplementary Planning Document (SPD) 2026. As the Government's adviser on the historic environment, Historic England is keen to ensure that its protection is fully considered at all stages and levels of the local planning process. We therefore welcome the opportunity to comment on these proposals.	Mr Andrew Marsh (Historic England)	Noted

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		<p>I can confirm that while we do not have any specific comments to make at this stage, we would be interested in receiving future consultations on this and related projects.</p>		
Introduction	<p>Paragraph 1.1 Pigeon supports the delivery of mixed and balanced communities</p>	<p>Pigeon fully supports the delivery of mixed and balanced communities. We have a proven track record of delivering high quality landscape and design - led schemes that deliver policy compliant affordable housing both within West Suffolk and the wider region.</p> <p>We agree that providing a choice of new homes, including well - integrated affordable homes, is an integral part of this.</p> <p>The following comments are provided in the interests of our ongoing collaborative relationship with West Suffolk Council and helping to ensure that any future guidance set out within the West Suffolk Affordable Housing SPD (the 'AHSPD') will help to achieve this objective while also boosting the delivery of affordable homes as part of mixed and balanced communities.</p>	Mr Rob Snowling (Pigeon)	Support is noted and welcomed

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Introduction	Support	Newmarket Town Council is generally supportive of the West Suffolk Council strategy.	Town Clerk (Newmarket Town Council)	Support is noted and welcomed
Introduction	At present the draft SPD fails to set out that military personnel are essential local workers and accordingly fall within the definition of affordable housing.	<p>Firstly, we would like to thank the Council for the opportunity to comment on the above emerging Affordable Housing consultation. These comments are submitted on behalf of the Secretary of State for Defence. Defence Infrastructure Organisation (DIO) is part of the Ministry of Defence (MOD) and plays a vital role in supporting our armed forces.</p> <p>The Ministry of Defence (MOD) has four military establishments within West Suffolk these being RAF Lakenheath, RAF Mildenhall, RAF Honington and Barnham Camp which are recognised within policy SP32 of the adopted Local Plan.</p> <p>The Affordable Housing SPD provides guidance defining Affordable Housing in accordance with the NPPF 2024 definition, discussing the different types of accommodation and need for Affordable Housing provision and how homes which do not meet this definition will not be considered Affordable Housing and</p>	Mrs Louise Dale (Defence Infrastructure Organisation Acquisitions and Disposals)	<p>Noted. The NPPF consultation states the Government intends to provide further guidance on how authorities should establish the need for military affordable housing. The council supports the provision of SFA and SLA where there is a need for military personnel. It is anticipated that the revised NPPF will be published in the summer of 2026. Through the preparation of the new local plan for West Suffolk the council will review its affordable housing policies in relation to the revised NPPF.</p> <p>No change is considered necessary to the SPD at this time.</p>

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		<p>the process for new developments etc.</p> <p>At RAF Lakenheath, RAF Mildenhall and RAF Honington there is Service Family Accommodation (SFA) and on the establishments Single Living Accommodation (SLA).</p> <p>To summarise, SFA is provided for service families (essential local workers) and their dependents and therefore is not available on the open market. Such properties are provided to fill a specific need and are subject to government subsidy. Service families pay a quartering charge for the properties, and this falls below private sector levels. At present the draft SPD fails to set out that military personnel are essential local workers and accordingly fall within the definition of affordable housing. It is considered necessary that the Affordable Housing SPD is amended so that it is in compliance with the NPPF (2025) by confirming that SFA is an affordable housing tenure and proposed developments for SFA are exempt from the requirement to provide affordable housing. This</p>		

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		<p>is an approach accepted by other Local Planning Authorities across the UK. It would be a significant national issue for the MOD if West Suffolk were to depart from that approach.</p> <p>Note the full text of this response can be seen on the councils website at: West Suffolk Affordable Housing Supplementary Planning Document 2026 - West Suffolk Planning Policy Consultations</p>		
Introduction	No Comment	At our Full Council Meeting on 9th February 2026, the Council decided not to comment.	Mrs Jackie Prior (Brandon Town Council)	Noted
Introduction	I can confirm that the County Council as Lead Local Flood Authority (LLFA) has no comments to make at this time.	<p>The officer-level comments below are made without prejudice.</p> <p>Thank you for your consultation on the above site, I can confirm that the County Council as Lead Local Flood Authority (LLFA) has no comments to make at this time.</p> <p>The LLFA is not currently able to carry out any review of the submitted documents or give any formal advice to the LPA for this consultation. As such, it should not be assumed that there is no impact associated with the</p>	Norfolk County Council	Noted

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		<p>proposed development in relation to surface water flood risk and drainage.</p>		
Introduction	<p>Amendments will be needed in this SPD where the NPPF is referenced if a new version of the NPPF is published before the SPD has been adopted.</p>	<p>Amendments will be needed in this SPD where the NPPF is referenced if a new version of the NPPF is published before the SPD has been adopted.</p> <p>While the SPD is unlikely to have any significant cross-boundary implications for Norfolk, we would make the following strategic observations/comments in relation to Section 106 agreement / Planning Obligations.</p> <p>The SPD should make it clear that any affordable housing scheme potentially impacting on local services and infrastructure (e.g. schools and transport infrastructure) will be expected make appropriate contributions to mitigate its impact in line with the recently adopted West Suffolk Local Plan Policy LP19.</p> <p>There should be reference to such contributions potentially needing to cover cross-boundary impacts, where appropriate. For example, housing growth in parts of</p>	Norfolk County Council	<p>Noted. It is anticipated that the revised NPPF will be published in the summer of 2026. Through the preparation of the new local plan for West Suffolk the council will review its affordable housing policies in relation to the revised NPPF.</p> <p>West Suffolk Council works closely with Suffolk County Council on highways, education and other infrastructure issues that involve a county function and consults neighbouring authorities where proposals may have a cross-border impact. The working relationship between SCC and NCC on proposals that have cross border infrastructure impacts is noted. Policy LP19 Community facilities and services and Policy SP31 Infrastructure ensure that any new infrastructure requirements arising from development proposals are funded by developers both within the district and across administrative boundaries.</p> <p>No change to the SPD is considered necessary.</p>

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		<p>Brandon; or elsewhere close to the Norfolk Boundary could potentially affect school numbers on roll in Norfolk Schools; and affect the local highway network. In such circumstances the neighbouring authorities should be consulted.</p> <p>It should be noted that Norfolk County Council works closely with its counterparts in Suffolk County Council on cross-boundary housing development / development close to the borders affecting schools in both LA areas, ensuring any new infrastructure requirements are funded from developers.</p>		
Introduction	The Jockey Club supports the Council's objective of increasing affordable housing delivery and providing clarity to applicants, decision makers and Registered Providers (RPs)	<p>The Jockey Club supports the Council's objective of increasing affordable housing delivery and providing clarity to applicants, decision makers and Registered Providers (RPs). The SPD is likely to be a material consideration in the determination of planning applications and will inform negotiations on affordable housing, viability and Section 106 obligations.</p> <p>However, it is essential that the SPD is applied as guidance and</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Support for the Council's objective of increasing affordable housing delivery is noted and welcomed.</p> <p>This Supplementary Planning Document (SPD) builds upon and provides more detailed advice or guidance on policies in the adopted Local Plan. SPDs are a material consideration in decision-making but cannot introduce new planning policies into the development plan or add unnecessarily to the financial burdens on development.</p> <p>No change to the SPD is considered necessary.</p>

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		<p>does not introduce additional policy tests or requirements beyond the adopted development plan or national planning policy/guidance. The Jockey Club considers that the SPD should be framed and applied in a manner which supports delivery of allocated sites, acknowledging that strategic/allocated sites can involve abnormal costs, high infrastructure dependencies and phased delivery requirements which require flexibility.</p> <p>It is noted that between the financial years of 2019 to 2020 and 2024 to 2025, 1,269 new affordable housing were delivered in West Suffolk on larger sites (10 units and above or over 0.5 hectares) but the delivery of affordable homes is often connected to a slower residential property market where volume housebuilders move the onus on to the delivery of affordable homes instead of full market ones.</p>		
National Planning Policy Framework	Social housing	Need to clarify and define how social housing is apportioned (65% of private market rent on an equivalent value property).	Town Clerk (Newmarket Town Council)	The definition of social rent as a form of Affordable Housing is set out in the glossary of the SPD. The rent is set in accordance with the Government's rent policy for Social Rent. This does not need to be defined within the SPD as rent setting is detailed by

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				<p>the Regulator of Social Housing, consequently the SPD refers to the types of affordable housing products available through the NPPF and not how rent should be set.</p> <p>No change to the SPD is considered necessary.</p>
National Planning Policy Framework	NPP Consultation	<p>The Government published a consultation on proposed updates to the National Planning Policy Framework (NPPF) the consultation runs until 10 March 2026. The results of this consultation could have implications for the draft West Suffolk Affordable Housing SPD. The current NPPF consultation proposes removing nationally prescribed requirements.</p> <p>These proposed changes shift the emphasis toward local discretion and site specific- negotiation. We strongly support this direction of travel and encourage the Council to ensure that the SPD reflects this increased flexibility. For allocated sites this could mean that the tenure mix can be shaped by local demand at the time of delivery, Registered Provider (RP) appetite and engagement, viability</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>The Government set out transitional arrangements in November 2025 which stated Supplementary Planning Documents (SPDs) will remain in force until planning authorities adopt a new style local plan and the final adoption date for new SPDs will be 30 June 2026, to ensure any advanced emerging SPDs can be adopted.</p> <p>Allocation AP20 Pinewood stud was viability tested as part of the plan making process and a policy compliant scheme was considered deliverable.</p> <p>No change to the SPD is considered necessary.</p>

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		<p>considerations and phasing rather than being constrained by fixed targets.</p> <p>The NPPF consultation reinforces the importance of viability in determining affordable housing contributions. For AP20 where early infrastructure including the delivery of a country park, drainage, access works, and ecological mitigation may be significant this provides a stronger basis for adjusting affordable housing percentages, phasing delivery, or using commuted sums where appropriate.</p>		
Local housing policy and guidance	Paragraph 2.16 review/update number of households on the register figure.	The AHSPD states that on 31 March 2025 West Suffolk had 1,684 households on their housing register. This appears to be the number of households on the housing register in a reasonable preference category. The number of households on the register is stated as 2,588.	Mr Rob Snowling (Pigeon)	Noted. Amend paragraph 2.16 text to include the Local Authority Housing Statistics (LAHS) returns figure of <u>2588</u>.
Local housing policy and guidance	Affordable housing delivery	The Jockey Club recognises that Affordable housing delivery forms a key part of West Suffolk Council's four Strategic Priorities and in particular to provide 'affordable, available and decent homes'. The Jockey Club support an evidenced tenure mix, and the	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Policy SP17 of the local Plan offers some flexibility of tenure by setting out a range of tenures, house types and size and sets out circumstances where a deviation from this range of mixes may be justified.</p> <p>The exact tenure mix of affordable housing should be identified through discussions with</p>

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		<p>objective of meeting identified housing needs. However, tenure mix expectations must remain deliverable and capable of responding to market realities, RP appetite and funding availability. A rigid approach risks delaying delivery or creating unnecessary re-negotiation during the application process or beyond.</p> <p>The SPD needs to confirm that tenure mix will be applied flexibly, informed by the most up-to-date evidence of need and RP engagement at the time of determination. It must recognise that RP procurement and funding can change during delivery (particularly on phased sites) and therefore controlled tenure substitutions may be appropriate, provided the overall affordable housing quantum and outcomes are secured and needs to avoid framing a lack of immediate RP “commitment” as a barrier to submission where the scheme remains deliverable through alternative routes consistent with policy.</p>		<p>West Suffolk Council's Strategic Housing Team and will be considered on a site-by-site basis. Provision will need to be in accordance with Policy SP17 and take into account the latest housing data of the surrounding area and the prevailing need for affordable housing.</p> <p>The SPD offers flexibility for multi phased sites with the affordable housing provision reviewed for each phase by the strategic housing team in order to ensure the delivery of the right size and type of housing to meet the current need.</p> <p>No change to the SPD is considered necessary.</p>
Local housing	Rural Exception Sites.	These are important for villages, but they must be kept for local people and contain everything	Mrs Maggie Dunn (Great Barton PC)	The recognition of the importance of this policy is welcomed. Policy SP18 of the Local Plan and the SPD require rural exception

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policy and guidance		from 1 bed to 4 bed for larger families.		sites to meet a recognised local need and the type and size of the housing provided would be expected to meet that need. No change to the SPD is considered necessary.
Providing affordable housing	All Affordable Developments	Will the SPD include any information on exceeding the minimum requirement of affordable housing? Specifically, All Affordable developments?	Charlotte Powell	Proposals will be considered on a case-by-case basis and informed by robust housing needs evidence. Where additionality has resulted in 100% affordable housing, this will have been delivered through developers and Registered Providers and not sought through S106 obligations. However, the delivery of additional homes secured on S106 developments is welcomed, as it will help to meet the councils OAN for affordable homes. No change to the SPD is considered necessary.
Providing affordable housing	Affordable housing should remain at 30% to enable growth - raising the requirement to 40% would make new developments unviable.	Barton Mills Parish Council considered the above document at last night's meeting. They would like to see affordable housing remain at 30% to enable growth. They feel that raising this to 40% would be counterproductive and make new developments unviable.	Parish Clerk (Barton Mills Parish Council)	The 40% requirement for affordable housing on greenfield sites is a requirement of adopted Local Plan Policy which is not being considered for amendment as part of this consultation. Given the level of need West Suffolk Council wishes to maximise the provision of affordable housing provided by development in the district. The requirements for affordable housing were viability tested as part of the plan making process and a policy compliant schemes are considered deliverable. Applicants have the option to

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				<p>justify reduced provision if they consider there are specific circumstances that merit this.</p> <p>No change to the SPD is considered necessary.</p>
Providing affordable housing	The proposed aim to deliver and provide affordable housing across a mix of tenures is noted, but the SPD should avoid prescribing fixed proportions.	The proposed aim to deliver and provide affordable housing across a mix of tenures is noted, but the SPD should avoid prescribing fixed proportions. Market conditions, Registered Provider interest, and local demand vary across the district. A more flexible, evidence led approach would allow developers and RPs to agree the most appropriate mix for each site. We also encourage the Council to recognise the growing role of Discounted market sale and Build- to- -rent affordable housing products. A broader range of tenures can improve delivery and widen access to housing. The Council also need to consider the content and direction of travel of the draft NPPF that is out for consultation.	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Policy SP17 of the local Plan offers some flexibility of tenure by setting out a range of tenures, house types and size and sets out circumstances where a deviation from this range of mixes may be justified.</p> <p>The exact tenure mix of affordable housing should be identified through discussions with West Suffolk Council's Strategic Housing Team and will be considered on a site-by-site basis. Provision will need to be in accordance with Policy SP17 and consider the latest housing data of the surrounding area and the prevailing need for affordable housing.</p> <p>The SPD recognises discounted market sales and build to rent affordable housing in paragraph 3.3.</p> <p>The Council will consider the need and options to review the SPD if necessary, once the draft NPPF is finalised.</p> <p>No change to the SPD is considered necessary.</p>

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Providing affordable housing	<p>Our principal concern relates to the proposed high level of affordable housing required and the process for resolving viability matters. In many parts of the district, achieving 40% will be challenging or unachievable when assessed against current sales values and construction costs.</p>	<p>Thank you for the opportunity to comment on the draft Affordable Housing Supplementary Planning Document.</p> <p>Bennett Homes attended the Developer Forum on 28 June 2025 to provide feedback on the proposed affordable housing requirements and to discuss these matters directly with policy officers.</p> <p>Our principal concern relates to the proposed high level of affordable housing required and the process for resolving viability matters. In many parts of the district, achieving 40% will be challenging or unachievable when assessed against current sales values and construction costs. Reduced profit margins are increasingly dropping to levels that do not match the level of risk associated with development, particularly where affordable housing requirements are high, as is the case in West Suffolk. The industry continues to experience significant construction cost rises, higher planning obligations and CIL payments, as well as increased regulatory standards, all</p>	Patrick Wales (Bennett Homes)	<p>The 40% requirement for affordable housing on greenfield sites is set out in adopted Local Plan policy SP16 which cannot be considered for amendment as part of this consultation.</p> <p>Given the level of need West Suffolk Council wishes to maximise the provision of affordable housing provided by development in the district. The requirements for affordable housing were viability tested as part of the plan making process and policy compliant schemes were considered deliverable. Applicants have the option to justify reduced provision if they consider there are specific circumstances that merit this.</p> <p>Paragraphs 4.7 to 4.9 of the SPD address circumstances where variations to the policy requirement are justified on viability grounds and refers to the Governments recommended approach to reviewing viability in Planning Practice Guidance. Appendix 1 of the SPD gives guidance on the information required to support a viability case. Provision of this information will help ensure a timely assessment of site specific viability evidence.</p> <p>No change to the SPD is considered necessary.</p>

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		<p>of which reduce land value to a point where landowners prefer not to sell. Ultimately such a high level of affordable housing will reduce the amount of housing delivered, both open market and affordable.</p> <p>If the Authority intends to maintain a 40% target, it is essential that there is a clear, structured and time-bound route for concluding viability discussions. These discussions should be cost effective, evidence-based, and capable of reaching timely outcomes. A defined mechanism is needed to address viability challenges, with cascading provisions so that development can continue even if there is a lack of interest or viable offers from Registered Providers. We have noted a reduced appetite from Registered Providers to purchase s106 dwellings, which reduces income and further to viability pressures.</p> <p>We also encourage the Authority to adopt a flexible and pragmatic approach in the current market. Where a developer has formally marketed the affordable housing</p>		

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		<p>element to Registered Providers for an agreed period (for example, six months) without success, there should be a clear process to agree alternatives, be that a change in tenures, a financial contribution, or reduced requirements .</p> <p>We respectfully request that the Authority engages in discussions regarding viability issues at all stages of the development process and establishes a clear and quick procedure for resolving them. This will provide greater certainty, support continued housing delivery, and assist in achieving shared objectives across the district.</p>		
Providing affordable housing	All types of affordable housing are important.	All types of affordable housing are important. It should be a mix so different families can be accommodated	Mrs Maggie Dunn (Great Barton PC)	<p>Policy SP17 of the local Plan offers some flexibility of tenure by setting out a range of tenures, house types and sizes. The exact mix of affordable housing is identified through discussions with West Suffolk Council's Strategic Housing Team on a site-by-site basis considering the latest housing data of the surrounding area and the prevailing need for affordable housing.</p> <p>No change to the SPD is considered necessary.</p>
Delivering affordable	It should be noted that the viability	It is recognised that the council will expect major developments to	Mr Adam Tuck (Adam J Tuck	Noted. The local plan policies and SPD have been drafted allowing some flexibility.

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housing and local planning policy	work supporting local plan allocations is out of date	<p>contribute towards the delivery of affordable housing in accordance with adopted local plan policies and that these policy requirements have been tested as viable and therefore are considered deliverable on all qualifying developments. It should be noted that the viability work was completed by the Councils own Consultants and this work was completed during 2023-2024. This work is now 2-3 years old and is out of date.</p> <p>Construction costs in the UK experienced significant volatility between 2023 and 2025, driven by post-pandemic supply chain issues and high inflation, with projections showing continued, albeit moderated, increases through 2026. 2025 was characterised by low output growth and high, though slowing, cost inflation. BCIS (Building Cost Information Service) reported that while tender prices rose by 2.3% in Q4 2024, inflationary pressure returned, driven by labour cost hikes and National Insurance changes. The introduction of the Future Homes Standard in 2026 and enhanced building safety</p>	Ltd) obo Mr J Thomas (Jockey Club)	<p>Paragraph 4.7 to 4.9 of the SPD address circumstances where variations to policy requirements are justified on viability grounds and refers to the Government recommended approach to reviewing viability in Planning Practice Guidance.</p> <p>The whole plan viability appraisal acknowledged that it was prepared at a challenging time to consider development viability, however it also recognised that viability varies over time and looked ahead for the whole plan period to 2041. The introduction of the Future Homes Standard was considered.</p> <p>No change to SPD considered necessary.</p>

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		<p>regulations are adding to construction overheads, and the viability testing did not allow for these and other regulatory changes.</p>		
<p>Policy SP16 Affordable housing</p>	<p>Paragraph 4.16 Clarify that a variation to a S106 on the grounds of viability will not usually be considered for five years but that variations may be agreed by deed of variation where this is necessary to facilitate delivery of new homes, including affordable homes.</p>	<p>While we acknowledge that it is unlikely that a variation to a S106 agreement on the grounds of viability will be required following a S106 being signed, it is not unusual for S106 agreements to be varied within five years of being signed where such variation is agreed by the relevant parties (including the Council) via a Deed of Variation. This could be for a number of reasons related to affordable housing or otherwise), which may include the need to amend a S106 to satisfy the funding requirements of a Registered Provider (RP) or to consider alternative tenures of affordable housing if there is no interest from an (RP).</p> <p>Indeed the need for Local Planning Authorities to take advantage of existing planning flexibilities to renegotiate S106 agreements and allow the tenure of homes to be varied in order to secure a buyer where affordable homes secured in S106 agreements remain</p>	<p>Mr Rob Snowling (Pigeon)</p>	<p>Noted. Paragraph 4.13 would benefit from clarification that variations of a S106 may be necessary to help facilitate the delivery of affordable homes.</p> <p><u>Amend the final sentence of paragraph 4.13 to read 'Once a S106 agreement is signed, a variation is not usually considered for five years, unless the council agrees alternative terms need to be drafted to help facilitate the delivery of affordable homes.'</u></p>

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		<p>uncontracted or unsold was set out in the Written Ministerial Statement made by the Minister of State for Housing and Planning , Matthew Pennycook , on 28 January 2026.</p> <p>We would therefore suggest that paragraph 4.13 is amended to retain the ability for a S106 agreement to be varied if agreed by all parties (including the Council) and to clarify that a variation to a S106 on the grounds of viability will not usually be considered for five years. This change will ensure that variations may still occur where this will help to deliver new homes, including affordable homes.</p>		
Policy SP16 Affordable housing	paragraph 4.17-4.20 replace reference to clusters of no more than 15 dwellings (and six properties in smaller villages with no more than around 15 dwellings (around six dwellings in smaller villages) unless	While the reference to cluster sizes provides useful guidance and we support the intention for market and affordable homes to be indistinguishable, limiting clusters to no more than 15 (or 6 in smaller villages) has the potential to prejudice the delivery of affordable homes by being overly prescriptive. We would suggest there is a need for some flexibility to allow consideration of appropriate cluster sizes on a site-by-site basis. This could refer to	Mr Rob Snowling (Pigeon)	No more than 15 homes affordable homes in one cluster is a standard benchmark for affordable housing delivery to ensure the creation of mixed and balanced communities. Detailed discussions around clustering, tenure and mix should be held with the Strategic Housing Team early in the planning process to ensure that a timely agreement on the distribution of affordable housing can be met (Local Plan para. 4.4.30). Para 4.18 of the SPD recognises there may be exceptions to the cluster requirement which allows flexibility and for cases to be considered on a site-by-site

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
	otherwise agreed by the Council.	<p>cluster sizes of no more than around 15 unless otherwise agreed by the Council to provide guidance while maintaining a degree of flexibility.</p> <p>Whilst we fully support the creation of mixed and balanced communities, in the absence of evidence that clusters of more than 15 affordable homes are the cause of problems within West Suffolk , there is a need for greater flexibility and a more nuanced approach. There are number of factors that need to be considered, including urban design (for example, the need to create a gateway feature, which may be more suited towards the affordable housing mix), a Registered Provider’s management requirements, as well as the phasing of a scheme, where clusters of more than 15 affordable homes could result in earlier delivery of affordable homes.</p>		<p>basis.</p> <p>No change to SPD is considered necessary.</p>
Policy SP16 Affordable housing	Paragraph 4.21 delete reference to maximum occupation.	The requirement to deliver all new homes to maximum occupation appears to be impractical. For example, requiring all 3 - bedroom homes to be designed as 6 person homes could have	Mr Rob Snowling (Pigeon)	Providing properties to the maximum number of persons ensures WSC can make best use of the property. There is some flexibility on a case-by-case basis where less persons can be justified and specific needs can be considered and occupation

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		implications for coverage and the number of homes that can be delivered across a site depending on its scale. This combined with the need to avoid under occupancy means that there should be flexibility based upon latest housing needs and the requirements of individual RPs.		negotiated. However, the council's preference and starting point for negotiation is always maximum capacity. No change to SPD considered necessary.
Policy SP16 Affordable housing	Paragraph 4.24-4.26 there should be no requirement to review viability for sites being delivered in two or fewer phases or within a period of 5 years.	It is important that any requirement for reviewing viability post decision does not introduce uncertainty that could potentially prejudice the delivery of new homes, including affordable homes. This is particularly relevant for smaller schemes and/or sites being delivered in a single or two phases. In the event that policy compliant affordable housing provision is not viable then we would suggest that any requirement to review scheme viability is not required for sites being delivered in two or fewer phases or within 5 years of the grant of planning permission.	Mr Rob Snowling (Pigeon)	The council recognises that the property market fluctuates over time. Changes to costs and values may result in scheme viability being different from what was considered at the planning application stage and that this is particularly the case for larger schemes that deliver over several phases or years. The text in paras. 4.24 - 4.26 support the flexible approach to requiring a review mechanism of non-policy compliant schemes set out in policy SP16 of the local plan. No change to SPD considered necessary.
Policy SP16 Affordable housing	4.5: Policy SP16 - Newmarket Town Council endorses the increase to 40% on greenfield and discussion with the Housing team on all	4.5: Policy SP16 - Newmarket Town Council endorses the increase to 40% on greenfield, as nationally it is 30%. 4.16: Strategic Housing Team is a new team - Newmarket Town	Town Clerk (Newmarket Town Council)	Support is noted and welcomed It should be noted that the Strategic Housing Team is not a new team, and have a statutory function within the council

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
	matters that are referred to in this document.	Council endorses the discussion with the team on all matters that are referred to in this document.		
Policy SP16 Affordable housing	The SPD must acknowledge the significant pressures currently affecting development viability,	<p>The Jockey Club recognise the importance of affordable housing provision; however, the SPD must acknowledge the significant pressures currently affecting development viability, including:</p> <ul style="list-style-type: none"> * Construction cost inflation * Rising finance costs * Market uncertainty * Increasing regulatory burdens (e.g., biodiversity net gain, nutrient neutrality, energy standards) <p>Rigid application of affordable housing percentages without adequate flexibility risks stalling development. The SPD should reinforce that:</p> <ul style="list-style-type: none"> * Viability assessments remain a legitimate and necessary tool * Site specific circumstances must be considered * Reduced affordable housing provision may be appropriate where justified by evidence. <p>A pragmatic approach will help ensure that sites continue to come</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Noted. The local plan policies and SPD have been drafted allowing some flexibility. Paragraph 4.7 to 4.9 of the SPD address circumstances where variations to policy requirements are justified on viability grounds and refers to the Government recommended approach to reviewing viability in Planning Practice Guidance. In addition, appendix 1 of the SPD sets out what information will be required to help justify a departure from policy on viability grounds.</p> <p>Policy SP17 of the local Plan offers some flexibility of tenure by setting out a range of tenures, house types and size and sets out circumstances where a deviation from this range of mixes may be justified.</p> <p>The exact tenure mix of affordable housing should be identified through discussions with West Suffolk Council's Strategic Housing Team and will be considered on a site-by-site basis. Provision will need to be in accordance with Policy SP17 and consider the latest housing data of the surrounding area and the prevailing need for affordable housing.</p> <p>The SPD offers flexibility for multi phased sites with the affordable housing provision</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>forward and that the Council’s housing targets remain achievable.</p> <p>Tenure mix expectations must remain deliverable and capable of responding to market realities, RP appetite and funding availability. A rigid approach risks delaying delivery or creating unnecessary re-negotiation during the application and delivery process. The SPD must confirm that tenure mix will be applied flexibly, informed by the most up to date evidence of need and RP engagement at the time of determination, recognise that RP procurement and funding can change during delivery (particularly on phased sites) and therefore controlled tenure substitutions may be appropriate, provided the overall affordable housing quantum and outcomes are secured and avoid framing a lack of immediate RP “commitment” as a barrier to submission where the scheme remains deliverable through alternative routes consistent with policy.</p> <p>Viability can legitimately be</p>		<p>reviewed for each phase by the strategic housing team to ensure the delivery of the right size and type of housing to meet the current need.</p> <p>The council recognises that the property market fluctuates over time. Changes to costs and values may result in scheme viability being different from what was considered at the planning application stage and that this is particularly the case for larger schemes that deliver over several phases or years. The text in paras. 4.24 - 4.26 of the SPD support the flexible approach to requiring a review mechanism of non-policy compliant schemes set out in policy SP16 of the local plan.</p> <p>Support for the principle of well designed, tenure blind affordable housing is welcomed.</p> <p>No change to SPD considered necessary.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>influenced by abnormal costs, infrastructure burdens, remediation, servicing constraints, and other site-specific factors. Viability needs to be assessed on a site-by-site basis. The SPD needs to be amended to confirm that where a site specific viability appraisal is justified, the Council will apply a proportionate evidence requirement consistent with national guidance and confirm the Council will engage constructively and pragmatically where abnormal costs and delivery constraints are robustly evidenced.</p> <p>The Jockey Club acknowledges the role of review mechanisms in certain circumstances, particularly where schemes are unable to meet policy requirements at the time of determination. However, review mechanisms must be carefully calibrated to ensure they do not undermine finance requirements, create excessive uncertainty, or unreasonably delay delivery, particularly on strategic/allocated sites.</p> <p>Review mechanisms must be used selectively and proportionately,</p>		

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>with clear justification and provide clarity on the circumstances in which early-stage and late-stage reviews will be applied and how they will align with reserved matters applications and phasing. Clear parameters and transparency around key assumptions must be provided to ensure the approach does not create undue uncertainty for delivery and investment decisions.</p> <p>We support the principle of well designed, tenure blind affordable housing. However, the SPD should avoid overly prescriptive requirements regarding clustering and distribution. Practical considerations such as management arrangements, service charges, and RP preferences often necessitate grouping affordable units. A balanced approach that allows modest clustering while maintaining- high design standards would be more realistic and deliverable.</p>		
Policy SP16 Affordable housing	Paragraph 4.18 support mixed and balanced communities and generally consider	Vistry support the desire to create mixed and balanced communities and generally consider the Council's current guidance of no more than 15 affordable homes to	Kate Goldie (Iceni Planning) obo Vistry Central Home Counties	The support for the approach set out in the SPD to flat blocks is noted and welcomed. Detailed discussions regarding tenure, mix and clustering should be held with the

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
	the guidance on clustering to be appropriate.	be clustered together to be generally appropriate. However, this can present a constraint for development phases where flatted blocks are proposed. There will be instances where RP's prefer that the affordable homes are clustered together for management purposes. Therefore, the acknowledgement is welcomed that for certain parts of the development which include flats it may be appropriate to exceed this clustering guidance to make the best use of land and not restrict the number of units, particularly given the wording at paragraph 4.34 which seeks to discourage mixed tenure flat blocks.		Strategic Housing team early in the planning process. Flexibility can be considered on a site-by-site basis but will only be considered if a balanced community can be achieved. No change to SPD considered necessary.
Policy SP16 Affordable housing	Development Affordable housing	All developments should contain affordable housing, so we get varied communities	Mrs Maggie Dunn (Great Barton PC)	Noted and welcomed. The council aims to maximise affordable housing delivery whilst being aware of central government guidance and legislation, and viability constraints.
Policy SP16 Affordable housing	Paragraph 4.18 Mixed tenure cluster can be more than 15 dwellings to allow greater flexibility to propose an appropriate tenure plan and layout.	4.18 Where a cluster of affordable housing is mixed tenure of rent and intermediate, then it should be considered reasonable for the cluster to be more than 15 dwellings. This will allow for greater flexibility for the Developer and the RP to propose an appropriate tenure plan and layout.	Ruth Newcombe (Latimer by Clarion Housing Group)	Para 4.18 of the SPD recognises there may be exceptions to the cluster requirement which allows flexibility and for cases to be considered on a site-by-site basis. Detailed discussions around clustering, tenure and mix should be held with the Strategic Housing Team early in the planning process to ensure that a timely agreement on the distribution of affordable housing can be met.

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
				No change to SPD considered necessary.
Other issues	Paragraph 4.31 clarify or delete reference to electric vehicle charging.	We agree that developers should seek to avoid designs that result in high maintenance or service charges where possible. However, the example provided of electric vehicle charging points requires further clarification. The installation and location of electric vehicle charging points is a matter covered by Building Regulations Approved Document S. The reference to electric vehicle charging points in the context of higher service charges requires further clarification or should be deleted.	Mr Rob Snowling (Pigeon)	To avoid unnecessary detail in the SPD regarding specific circumstances where high service and maintenance charges are incurred it is suggested the text in brackets is deleted from paragraph 4.31. Delete (for example service charges associated with electric vehicle charging points) from para. 4.31.
Other issues	Paragraph 4.37 clarify that this does not preclude consideration of size and type of housing across multiple phases and that this will be balanced against other matters relevant to the delivery of good quality design.	We support the Council's desire to provide flexibility to respond to changing need. However, it will be important that any consideration of the size and type of housing does not undermine certainty of scheme delivery. It is therefore important that applicants retain the ability to confirm the size and type of housing to be delivered across multiple phases, where approval of reserved matters is being sought for multiple phases. It is also important that consideration of need is balanced	Mr Rob Snowling (Pigeon)	Noted. Any review of phased development would be carried out in discussion with the registered provider (RP) and developer, and other relevant planning issues considered in the planning balance before any decision is made. The affordable housing mix will be reviewed at each Reserved Matters stage on a phased development with the Strategic Housing Team and developer. This will ensure we capture the most up to date housing need and the affordable housing mix proposed will support this. It is not considered reasonable to secure the affordable housing mix upfront on major/phased developments as needs are likely to change over the development

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		against site specific and place making aspirations.		period. The same principle applies to market housing, where it is unlikely it would be considered reasonable to secure all market homes at the outset, with a 5 year plus build programme. No change considered necessary
Other issues	<p>Para 4.31: maintenance/service charges</p> <p>Para 4.41: West Suffolk Council. S106 agreements</p> <p>Para 4.42: Homes England subsidy?</p> <p>Para 4.60: local connection.</p> <p>Para 4.61: definition of 'local connection' needs to be rigorously applied.</p>	<p>4.31: Developers should actively look at maintenance/service charges that are minimised.</p> <p>4.41: Need to specify 'the council' as West Suffolk Council. S106 agreements need to be more robust in terms of contribution to immediately local services. Cross ref to 4.61</p> <p>4.42: Why is a significant proportion of affordable housing within West Suffolk not subsidised by Homes England?</p> <p>4.60: The council should seek to prioritise the letting and or sale of affordable housing to those with a local connection to the parish.</p> <p>4.61: The concept of exact definitions of 'local connection' needs to be rigorously applied. Cross ref to 4.41.</p>	Town Clerk (Newmarket Town Council)	<p>Para. 4.31: Noted. The SPD seeks to avoid unnecessary high service charges, although it is recognised that good placemaking will involve some service and maintenance costs.</p> <p>Para. 4.41: This paragraph is dealing with S106 agreements that address nomination agreements and would be entered into with West Suffolk Council as the local planning authority.</p> <p>Para 4.42: Homes England do not fund S106 contributions, (only additionality on sites, those units over the developer contribution) or 100% affordable housing sites, can attract grant.</p> <p>Para. 4.60: Developments can only be allocated to those with a local connection if they have been delivered through an exception site. All affordable homes secured through the local plan will be allocated to those with a connection to West Suffolk. If you are interested in bringing forward an exception site, please contact the Strategic Housing Team for further information.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
				<p>Para 4.61: This paragraph concerns local connection whereas para 4.41 addresses securing affordable housing in perpetuity, no cross reference is considered necessary.</p> <p>Typo - make 'definitions' singular in para 4.61 to read 'definition'</p>
Other issues	<p>The Jockey Club support the principle of well designed, tenure-blind affordable housing. However, the SPD should avoid overly prescriptive requirements regarding clustering and distribution.</p>	<p>The guidance concerning Vacant building credit is supported.</p> <p>The Jockey Club support the principle of well designed, tenure-blind affordable housing. However, the SPD should avoid overly prescriptive requirements regarding clustering and distribution. Practical considerations such as management arrangements, service charges, and RP preferences often necessitate grouping affordable units. A balanced approach that allows modest clustering while maintaining high design standards would be more realistic and deliverable. Proposals should also consider the implications of service and management charges on the viability of a proposal.</p> <p>The Jockey Club supports the delivery of high-quality homes,</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Support for the SPDs guidance on vacant building credit, well designed tenure blind affordable housing, clarity on how affordable housing will be secured through conditions and Section 106 obligations, registered providers and funding for affordable housing is noted and welcomed.</p> <p>Para 4.18 of the SPD recognises there may be exceptions to the cluster requirement which allows flexibility and for cases to be considered on a site by site basis. Detailed discussions around clustering, tenure and mix should be held with the Strategic Housing Team early in the planning process to ensure that a timely agreement on the distribution of affordable housing can be met.</p> <p>Para 5.10 of the SPD confirms that details of the proposed affordable housing can be provided at a later stage in the application process and that this will be secured by condition on any outline permission.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>including adequate internal space standards and appropriate accessibility standards. For outline and phased schemes, detailed compliance should be capable of being secured at reserved matters stage where appropriate.</p> <p>The SPD needs to confirm that detailed compliance with space standards and accessibility requirements can be addressed proportionately at reserved matters stage for outline permissions, and that the SPD will be applied consistently with Local Plan policy and the Building Regulations framework.</p> <p>Prescriptions relating to clustering can conflict with a design led approach, and on certain sites may constrain typologies (including apartments), street hierarchy, character areas and RP operational preferences. The SPD needs to ensure that any guidance on clustering is framed as indicative and remains design led, allowing the most appropriate master planning solution to come forward and confirm that the overarching objective is integration and tenure blindness,</p>		<p>No change to the SPD is considered necessary.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>rather than adherence to a fixed numerical cap.</p> <p>Flatted development: Individual flats within a mixed tenure block will not be attractive to RPs, therefore, where flats are to be provided, the affordable homes should be in a separate building which enables the registered provider (RP) to acquire the freehold and management control of the block. If a separate building cannot be provided a building with separate access arrangements might provide a viable solution.</p> <p>The Jockey Club supports the SPD providing clarity on how affordable housing will be secured through conditions and Section 106 obligations. On strategic/allocated sites, delivery triggers and phasing often need to respond to infrastructure delivery, market absorption, and RP procurement timing.</p> <p>The SPD needs to confirm the Council will support bespoke phasing and triggers for allocated sites, provided policy outcomes are secured across the development as a whole, avoid</p>		

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>overly rigid trigger points that could impede infrastructure delivery and coherent placemaking and promote early agreement of draft heads of terms to reduce delay at the determination stage.</p> <p>Support: Affordable housing registered providers and Funding affordable housing sections.</p>		
Other issues	<p>Paragraph 4.31 support Paragraph 4.34 support</p>	<p>Paragraph 4.31</p> <p>Vistry support this paragraph and welcome its inclusion, however this objective needs to be balanced against wider policy requirements set out in the Local Plan. The acknowledgement that EVCP provision can generate a high service charge is correct and we welcome flexibility with the provision of this for affordable homes, but the wording of this paragraph should go further. There are other specific policy considerations, such as the desire for all flats to be M4(2) compliant, meaning the inclusion of a lift is necessary, which will have significant maintenance and service charge implications for RP's. This is also the case for the</p>	<p>Kate Goldie (Iceni Planning) obo Vitry Central Home Counties</p>	<p>Support is noted and welcomed.</p> <p>Para 4.31: Policy SP17 of the local plan allows flexibility in the requirement for M4(2) homes where site specific factors mean that those standards cannot be achieved or would make the development unviable.</p> <p>Para 4.34: The SPD recognises there may be exceptions to the cluster requirement which allows flexibility and for cases to be considered on a site by site basis in para. 4.18. Detailed discussions around clustering, tenure and mix should be held with the Strategic Housing Team early in the planning process to ensure that a timely agreement on the distribution of affordable housing can be met.</p> <p>No change to the SPD is considered necessary.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>provision of green roofs.</p> <p>Paragraph 4.34</p> <p>Vistry support the statement provided at paragraph 4.34 and agree that this reflects the commercial requirements of RP's. This should be implemented in practice with paragraph 4.18 and wording in the draft SPD should be clear that the clustering requirement of no more than 15 affordable dwellings may be exceeded for parts of the development that include flats where keeping the number at 15 or less would not optimise scheme capacity and delivery of affordable homes.</p>		
Other issues	<p>Paragraph 4.37 support</p> <p>Paragraph 4.39 support</p>	<p>Paragraph 4.37</p> <p>We support the requirement for the affordable housing on multi-phased developments to be reviewed on a phased basis at each Reserved Matters stage. The wording of this could be amended to acknowledge that whilst affordable housing should be reviewed at each phase, consideration of the overall affordable unit mix for the</p>	<p>Kate Goldie (Iceni Planning) obo Vistry Central Home Counties</p>	<p>Support is noted and welcomed.</p> <p>Para 4.37: Consideration of the overall affordable unit mix for the development and balance of units forms part of the assessment of multi phased development.</p> <p>No change to the SPD is considered necessary.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>development and balance of units should also form part of the assessment, with the potential for certain phases within a multi-phased permission to deliver more of a certain tenure/unit size to ensure there is balance across the masterplan. This will also positively reflect the different character areas and approaches to density that characterise multi-phased schemes. The requirements of Policy SP17 will still overall be met, but with a more flexible approach taken on a phase-by-phase basis.</p> <p>Paragraph 4.39</p> <p>The RP market is broadening and there are a wide range of suitable RP partners who can deliver and manage affordable homes within the district. As a result, we agree that the Council should not impose their preference for an RP on schemes as this may limit the potential RP partners for specific developments. This is particularly important given the recognised downturn in the RP market.</p>		
Other issues	4.34 and 4.41	4.34. Affordable housing tenures should have separate cores and there should not be more than 4	Ruth Newcombe (Latimer by	Noted. However, to include a nominations agreement within the S106 would require an RP partner being secured upfront. This is

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>one-bedroom flats for rented tenures within the same core, this is to reduce the risk of intense housing management being required where there are too many one bed flats in a single core.</p> <p>4.41. The nominations requirements can be set out within the S106, removing the requirement for a separate nominations agreement unless the scheme is an exception site. The RP can enter into an overarching nominations agreement to cover all schemes. This would reduce the administrative burden of entering into many separate nominations agreements.</p>	Clarion Housing Group)	<p>unlikely to be practical where an outline planning application has been approved. The Strategic Housing Team does not charge for drafting nomination agreements and therefore no additional cost for this service is necessary.</p> <p>No change to SPD considered necessary.</p>
Policy SP17 Housing type and tenure	The proposed tenure mix is noted, but the SPD should avoid prescribing fixed proportions.	<p>Policy SP17 Housing type and tenure</p> <p>Jockey Club response to Policy SP17 Housing types and tenure paragraphs 4.43 -4.50.</p> <p>The proposed tenure mix is noted, but the SPD should avoid prescribing fixed proportions. Market conditions, Registered Provider interest, and local demand vary across the district. A more flexible, evidence led</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Support for Rural exception sites and Housing needs of specific groups is noted and welcomed.</p> <p>Policy SP17 of the local plan sets out a range of housing types and tenures which allows flexibility. The tenure mix was tested at the viability stage of the local plan and is considered developable. Any changes from this would need to be justified in line with the policies criteria and agreed with the Strategic Housing Team.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>approach would allow developers and RPs to agree the most appropriate mix for each site.</p> <p>SP18 Rural exception sites - Support</p> <p>Policy LP14 Housing need of specific groups - Support</p>		No change to the SPD is considered necessary.
Policy SP17 Housing type and tenure	SCC notes and welcomes paragraphs 4.49 and 4.50 which require M4(2) and M4(3) standards.	SCC notes and welcomes paragraphs 4.49 and 4.50 which contains requirement of M4(2) and M4(3) standards.	Suffolk County Council (Growth, Highways and Infrastructure)	Support is noted and welcomed.
Policy SP17 Housing type and tenure	<p>Paragraph 4.46 Tenure flexibility</p> <p>Paragraph 4.48 Flatted development</p>	<p>Para 4.46: Whilst we recognise the Council's preference is for social rent, affordable rent is recognised within the NPPF as an appropriate affordable housing tenure. Whilst the SPD can express a preference, this should not be applied rigidly to the tenure of affordable housing schemes. Schemes with existing outline permission will build out in accordance with the obligations in the completed Section 106 Agreement.</p> <p>Paragraph 4.48</p> <p>Whilst we recognise the Council's preference for affordable</p>	Kate Goldie (Iceni Planning) obo Vistry Central Home Counties (<p>Para 4.46: Noted. This paragraph recognises both social and affordable rent as an acceptable affordable tenure. It is not envisaged that that policy compliant outline permissions with completed Section 106 agreements will be reviewed. Agreed, it states a preference but does not dictate. No change necessary.</p> <p>Para 4.48: Noted</p> <p>Policy SP17 of the local plan allows flexibility in the requirement for M4(2) and M4(3) homes. Cases will be considered on a site-by-site basis at the application stage.</p> <p>No change to the SPD is considered necessary.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>accommodation is houses over flats, there is still market demand from RPs for affordable flats, and this should be acknowledged. The inclusion of higher density flats within larger permissions can be appropriate, particularly in the context of the new draft NPPF which is actively promoting more denser form of development to increase housing numbers or on approved schemes which have parameter plans setting certain density requirements for the development.</p>		
<p>Policy SP17 Housing type and tenure</p>	<p>Paragraph 4.49 Accessibility standards, management and maintenance costs and viability.</p>	<p>Para 4.49: The requirement for all new homes, including affordable homes, to be built to M4(2) standard has significant consequences for low-rise flatted blocks which traditionally would not have included a lift. Registered Providers are often cautious about incorporating lifts within low-rise apartment blocks due to the significant long-term cost and management implications. While lifts can provide convenience, they introduce substantial ongoing financial commitments that directly affect service charges and overall affordability for residents.</p>	<p>Kate Goldie (Iceni Planning) obo Vistry Central Home Counties</p>	<p>Para 4.49: Noted. Add text to recognise the issues raised regarding low rise blocks.</p> <p>Add new text after second sentence to read:</p> <p><u>'It is recognised that in affordable low rise blocks installation of a lift may place excessive maintenance and service obligations on the RP threatening viability. In such circumstances where omission of a lift has been fully justified it is expected that ground floor flats will be M4(2) compliant and the council will apply discretion on the upper stories with the</u></p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>Lifts require: Regular servicing and statutory inspections, which carry high annual costs; responsive and planned maintenance, where even minor faults can be expensive to rectify and may require specialist contractors; end-of-life replacement, which is a major capital expenditure and must be anticipated within long-term asset plans; Increased health and safety obligations, including compliance, record-keeping, and ensuring safe operation at all times.</p> <p>For many RPs (who are under pressure to keep service charges affordable, particularly for affordable and social housing tenants) the costs associated with lifts can make schemes financially unviable or lead to service charges that residents may struggle to meet. As a result, where lifts are not a planning requirement or essential for accessibility needs, RPs often prefer walk-up apartment designs to maintain long-term affordability and ensure service charges remain manageable for residents. A blanket requirement for all flats to strictly fully meet M4 (2)</p>		<p><u>expectation that accessibility will be maximised.'</u></p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>building regulation requirements can be disproportionate to actual needs and can introduce substantial financial commitments to RPs.</p>		
<p>Policy SP17 Housing type and tenure</p>	<p>Para 4.49. Policy should be specific on whether the requirement is for Cat 3 (2) (a) or Cat 3 (2) (b).</p>	<p>A M4(2) requirement for upper floor flats and maisonettes will increase the build costs and the service charges – due to the requirement of a lift to comply with M4(2). There should be flexibility allowed for upper floor flats and maisonettes to be exempt from the M4(2) requirement so that affordability is not compromised and so that maisonettes can be incorporated into schemes without the complexity trying to design the upper floor maisonettes to meet M4(2).</p> <p>Policy should be specific on whether the requirement is for Cat 3 (2) (a) or Cat 3 (2) (b). A sensible approach could be for Cat 3 (2) (b) to be the default requirement, unless otherwise agreed with the Council on a scheme-by-scheme basis, depending on the most recent evidenced need.</p>	<p>Ruth Newcombe (Latimer by Clarion Housing Group)</p>	<p>Policy SP17 of the local plan allows flexibility in the requirement for M4(2) and M4(3) homes where site specific factors mean that those standards cannot be achieved or would make the development unviable.</p> <p>Para 4.49: Add text to recognise the issues raised regarding low rise blocks.</p> <p>Add new text to read:</p> <p><u>It is recognised that in affordable low rise blocks installation of a lift may place excessive maintenance and service obligations on the RP threatening viability. In such circumstances where omission of a lift has been fully justified it is expected that ground floor flats will be M4(2) compliant and the council will apply discretion on the upper stories with the expectation that accessibility will be maximised.</u></p> <p>Add new text after the first sentence to read: <u>M4(3)(2)(b) wheelchair accessible standard is the council's default preference as this will provide a fully adapted property ensuring all a</u></p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
				<p><u>wheelchair users needs are met. When carrying out a needs analysis at the pre application or application stage consideration can be given to reduce this to the M4(3)(2)(a) wheelchair adaptable standard if a need for M4(3)(2)(b) is not identified.</u></p>
SP18 Rural exception sites	<p>SP18 Rural exception sites: Paragraph 4.54 Objection to the meaning of "small" for rural exception sites. which is inconsistent with the approach set out in draft NPPF (December 2025)</p>	<p>Paragraph 4.54 – Size of Exception Sites</p> <p>This representation objects to paragraph 4.54 on the basis that the proposed numerical cap on rural exception sites is not consistent with national policy and is therefore unsound.</p> <p>The restriction to: No more than 10 units in a larger village; and no more than six units in a smaller village introduces an inflexible and unjustified ceiling which conflicts with the approach set out in the draft National Planning Policy Framework (December 2025 consultation version).</p> <p>The policy is not justified, not effective, and not consistent with national policy. The proposed wording removes planning judgment and may unnecessarily constrain the delivery of rural affordable housing. The policy</p>	Mr Amir Aramfar (Future PD)	<p>Paragraph 4.54 of the SPD sets out guidelines for the size of rural exception sites dependant on the location, settlement and local need etc. and is not a local plan policy requirement. However, as a further guideline this section would benefit from text clarifying the recommended maximum size of exception sites.</p> <p>Para 4.54 add text to clarify the maximum recommended size of an exception site.</p> <p>Add new text after bullet points to read:</p> <p><u>As a maximum exception sites should not be larger than 1 hectare in size or exceed 5% of the size of the existing settlement.</u></p>

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		<p>should instead align with national policy by adopting a proportionate, criteria-based approach rather than an arbitrary unit threshold.</p> <p>Proposed Modification: Paragraph 4.54 should be amended to align with national policy by removing the fixed unit cap and replacing it with a proportionality-based approach.</p> <p>Suggested replacement wording: “The size of an exception site should be proportionate to the size of the settlement and reflect identified local housing need. Exception sites should accord with national policy and should not exceed 1 hectare in size or 5% of the size of the existing settlement, unless otherwise specified in the development plan.” Alternatively, the numerical guide should be expressly framed as indicative and subject to planning judgment, rather than an absolute cap.</p> <p>Note the full text of this response can be seen on the councils website at: West Suffolk Affordable Housing Supplementary Planning Document 2026 - West</p>		

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		Suffolk Planning Policy Consultations		
LP14 Housing need of specific groups	SCC supports housing that combines independent housing with flexible levels of care and support in line with the county council's future strategy for extra care.	SCC supports paragraph 4.65 and 4.67. Especially as "a model of housing that combines independent housing with flexible levels of care and support" is in line with the county council's future strategy for extra care.	Suffolk County Council (Adult Social Care, Supported Housing and Adaptable Housing)	Support is noted and welcomed
The planning application process	The SPD should operate strictly as guidance and must not introduce new policy requirements beyond those set out in the adopted Local Plan.	<p>Jockey Club response to the planning application process paragraphs 5.1 – 5.4.</p> <p>The SPD should operate strictly as guidance and must not introduce new policy requirements beyond those set out in the adopted Local Plan. Several sections of the draft document appear to impose additional obligations particularly around tenure mix, space standards, and design specifications which risk being interpreted as policy. We encourage the Council to ensure that the SPD remains consistent with national guidance and does not create new policy burdens that could undermine viability.</p> <p>The SPD places significant</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Noted. The SPD builds upon and provides more detailed advice and guidance on the policies in an adopted local plan. It is recognised that it cannot introduce new planning policy requirements but will be a material consideration in decision-making once adopted.</p> <p>No change to the SPD is considered necessary.</p>

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		<p>emphasis on early engagement with RPs. While we support this in principle, the Council should acknowledge that RP appetite varies and is often influenced by external funding cycles. Developers should not be penalised where RP engagement proves challenging. A more collaborative approach, potentially including a list of preferred RPs or a Council facilitated brokerage process, could be beneficial.</p>		
Pre-application advice	We propose the following amended working relating to viability assessments.	<p>Pre-application advice - Support</p> <p>Jockey Club response to Full applications paragraphs 5.6 – 5.8.</p> <p>We propose the following amended working relating to viability assessments.</p> <p>Where the affordable housing requirement cannot be met, a full and <u>proportionate</u> viability assessment will need to be submitted. This must be agreed with the council. The applicant shall be responsible for the <u>reasonable</u> costs where an assessment needs to be independently reviewed.</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Support for paragraph 5.5 concerning pre-application advice and paragraphs 5.9 - 5.10 regarding Outline applications is noted and welcomed. (BN)</p> <p>Any viability assessment would be expected to follow the government’s recommended approach to assessing viability as set out in National Planning Guidance and be proportionate, simple, transparent and publicly available. It is not considered necessary to repeat this requirement in the SPD.</p> <p>No change to the SPD is considered necessary.</p>

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		Outline applications - Support		
Outline applications	Paragraph 5.10 Clarify wording.	Paragraph 5.10 The wording of this paragraph could be clearer that for multiple phased permissions the precise affordable housing unit mix will be established at Reserved Matters stage, rather than secured from the outset under a planning condition attached to the outline permission. This would be challenging for outline schemes and would not respond to up to date needs that can change during the course of the build out of strategic sites.	Kate Goldie (Iceni Planning) obo Vistry Central Home Counties	Where details of proposed affordable housing have not been submitted with an outline application paragraph 5.10 of the SPD allows the precise affordable housing unit mix and other details to be defined at Reserved Matters stage by placing a condition on the outline permission. No change to the SPD is considered necessary.
Section 106 agreements	Paragraph 5.11-5.17 include provision for an affordable housing cascade within the Council's standard draft deed.	Issues surrounding the delivery of S106 affordable housing linked to a lack of interest from RPs have been well documented. In order to ensure that this does not prejudice the delivery of all forms of housing, including affordable homes, we would strongly urge the Council to consider the inclusion of an affordable housing cascade within its standard draft deed. Such a mechanism would enable the tenure and mix of affordable housing to be reconsidered in the event that RP offers for the Council's preferred	Mr Rob Snowling (Pigeon)	Housing Enabling and Strategy Officers use their established relationships with RPs to help identify a suitable partner to take on the S106 units or, where necessary, to negotiate adjustments to the mix to support delivery. There is already sufficient flexibility within the S106 process to make mutually agreed adaptations, and we have demonstrated this in practice on the rare occasions it is necessary. No change is considered necessary to the SPD.

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>mix are not forthcoming within an agreed period, followed by the payment of a commuted sum as detailed within paragraphs 5.18 - 5.32 of the AHSPD.</p> <p>While this may only be required in exceptional circumstances, we consider that it is important to include such a mechanism to ensure the delivery of new homes across the District and to avoid unnecessary delays in the event of changes to market conditions and/or national planning policy.</p> <p>We would welcome the opportunity to discuss this (along with any of the other points raised above) with officers of the Council, if this would be of assistance.</p>		
Section 106 agreements	The Jockey Club supports the SPD providing clarity on how affordable housing will be secured through conditions and Section 106 obligations.	<p>The Jockey Club supports the SPD providing clarity on how affordable housing will be secured through conditions and Section 106 obligations. On strategic/allocated sites, delivery triggers and phasing often need to respond to infrastructure delivery, market absorption, and RP procurement timing.</p> <p>The SPD needs to confirm the</p>	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	<p>Noted. The council makes a commitment to behaving reasonably in applying its policies on affordable housing and to have regard to best practice and other advice in Paragraph 5.15 of the SPD.</p> <p>No change is considered necessary to the SPD</p>

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		<p>Council will support bespoke phasing and triggers for allocated sites, provided policy outcomes are secured across the development as a whole, avoid overly rigid trigger points that could impede infrastructure delivery and coherent placemaking and promote early agreement of draft heads of terms to reduce delay at determination stage.</p> <p>Delivery conditions can change materially over multiyear build periods (particularly on phased sites). A blanket position discouraging variations for a fixed period may create a deliverability risk where market and cost conditions change significantly</p> <p>The SPD needs to confirm that any approach to Section 106 variations will be applied reasonably, and that where material changes threaten deliverability, the Council will engage constructively to secure continued delivery of Local Plan allocations and affordable housing.</p>		
Section 106 agreements	5.17 nominations requirements should	5.17 The nominations requirements should be inserted	Ruth Newcombe	Noted. However, to include a nominations agreement within the S106 would require an

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
	be inserted into the S106 to reduce an administrative burden	into the S106 to remove the administrative burden of a separate nominations agreement on a scheme-by-scheme basis, unless the scheme is a rural exception site. The RP could have an overarching nominations agreement with the Council which call apply to all the RP schemes within that local authority if necessary.	(Latimer by Clarion Housing Group)	RP partner being secured upfront. This is unlikely to be practical where an outline planning application has been approved. The agreement contains bespoke elements such as the affordable housing mix and local lettings plans if needed. The Strategic Housing Team does not charge for drafting nomination agreements and therefore no additional cost is generated for this service. No change to SPD considered necessary.
Commuted sum	Affordable housing should be provided, rather than a commuted sum.	Newmarket Town Council would strongly insist that affordable housing is provided, rather than a commuted sum.	Town Clerk (Newmarket Town Council)	Noted. On-site provision of affordable housing will always be the council's preference. However, in exceptional circumstances and if robustly justified it may be more appropriate to consider off-site provision or a commuted sum. No change to the SPD is considered necessary.
Commuted sum	The Jockey Club supports the general presumption that affordable housing should be delivered on-site to secure mixed and balanced communities.	Jockey Club response to Commuted Sums paragraphs 5.18 – 5.32. The Jockey Club supports the general presumption that affordable housing should be delivered on-site to secure mixed and balanced communities. The SPD should clearly allow for appropriate flexibility where: * Site wide master planning and	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	Noted. The SPD makes the councils position clear that financial contributions in lieu of on-site provision of affordable housing will only be considered in exceptional circumstances and that it is for the applicant to put forward a robust justification in such cases. 'Site wide master planning and placemaking objectives' are unlikely to justify off site provision. Government guidance includes providing a mix of home tenures, types and sizes as a cornerstone of successful placemaking.

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		<p>placemaking objectives would be compromised; * RP appetite or operational requirements influence delivery mechanisms; * Phased infrastructure delivery necessitates a tailored approach.</p> <p>The commuted sum methodology and assumptions can materially affect deliverability and land value and therefore require maximum transparency and realism. The SPD needs to confirm that off-site provision and/or commuted sums may be acceptable where justified and where it represents the most effective and deliverable route to secure affordable housing outcomes and ensure the commuted sum methodology is transparent, with clear assumptions, and confirm that it will be kept under review to reflect changing build costs, values, funding conditions and RP purchasing capacity.</p>		<p>No change to the SPD is considered necessary.</p>
Management	Change of Housing providers	Where these change then the rules must change with them	Mrs Maggie Dunn (Great Barton PC)	<p>The SPD will apply equally to all housing providers.</p> <p>No change to the SPD is considered necessary.</p>
Control of occupancy	Para 6.5 nominations	Para 6.5. The nominations requirements can be set out in the	Ruth Newcombe	Noted. However to include a nominations agreement within the S106 would require an

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	requirements can be set out in the S106.	S106 so that a separate nomination agreement for each individual scheme is not required (unless it is an exception site)	(Latimer by Clarion Housing Group)	RP partner being secured upfront. This is unlikely to be practical where an outline planning application has been approved. The agreement contains bespoke elements such as the affordable housing mix and local lettings plans if needed. The Strategic Housing Team does not charge for drafting nomination agreements and therefore no additional cost is generated for this service. No change to SPD considered necessary.
Perpetuity	Para 6.11: Perpetuity - how is this guaranteed?	6.11: Perpetuity - how is this guaranteed? Registered Provider must ensure retention of level of housing stock is maintained i.e. sold properties must be re-invested in the area. There should be preference to upgrade the property, rather than reduce the stock via a sale.	Town Clerk (Newmarket Town Council)	Noted. Affordable homes are secured in perpetuity through the S106 agreement, except in the cases of staircasing. No change is considered necessary to the SPD.
Perpetuity	Para 6.14: It should be clarified here that a DPA waiver is only required for grant funded affordable homes.	6.14: It should be clarified here that a DPA waiver is only required for grant funded affordable homes, not S106 affordable homes.	Ruth Newcombe (Latimer by Clarion Housing Group)	Designated Protected Area (DPA) guidance states: <i>"The Regulations and Order - 4.1 The Regulations and Order apply to England only and are applicable regardless of whether the homes have received grant funding from the Agency or otherwise."</i> No change to the SPD is considered necessary.
Appendix 1: Viability	It is noted that the list provided at	Jockey Club response to Appendix 1: Viability appraisal content.	Mr Adam Tuck (Adam J Tuck	Noted. It is anticipated that the revised NPPF will be published in the summer of

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appraisal content	Appendix 1 is not exhaustive, but the planning system is being reformed and a collaborative approach is required. .	It is noted that the list provided at Appendix 1 is not exhaustive, and further information may be requested by the council throughout the appraisal process but Planning policy is constantly evolving, and the government is in the process of completely reforming the planning system. This will include changes to the way development contributions will be calculated. The government is trying to balance the need to deliver local plan objectives with ensuring land for development comes forward. It has prescribed a way to assess viability for this purpose and helps professionals in the sector to do this faster and more transparently. A collaborative approach by developer/applicant, landowner and Council is required to facilitate the Viability appraisal process. The onus should be on all parties to work together; further information might be requested by all parties including the Council during the process.	Ltd) obo Mr J Thomas (Jockey Club)	2026. Through the preparation of the new local plan for West Suffolk the council will review its affordable housing policies in relation to the revised NPPF. No change is considered necessary to the SPD at this time.
Appendix 2: Calculating a commuted sum	Affordable housing needs to be realistic and directly reflect the local wages.	Affordable housing 'takes account of local wages and house prices'. Needs to be realistic in the local	Town Clerk (Newmarket Town Council)	Noted. It is national policy that affordable rents are set in line with the governments rent policy for example affordable rent must be at least 20% below local market rents,

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		area, directly reflecting the local wages as a higher determinant.		and discounted market sales 20% below local market value. No change to the SPD is considered necessary.
Appendix 2: Calculating a commuted sum	Flexibility needs to be applied to calculations due to market conditions, RP funding and appetite at the time.	Appendix 2: Calculating a commuted sum. Jockey Club response to Appendix 2: Calculating a commuted sum The content of Appendix 2 provides a very general approach to calculating an appropriate commuted sum but flexibility needs to be applied due to market conditions and RP funding and appetite at the time.	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	Noted. The calculation ensures that there is no advantage to the developer to not deliver affordable housing on site and would reflect current market conditions, it is therefore considered robust and fit for purpose. Any issues with viability should be addressed separately. No change to the SPD is considered necessary.
Appendix 3: Affordable housing checklist	We acknowledge that Appendix 3 should provide flexibility around the distribution of affordable housing and amendments to S106 agreements.	Appendix 3: Affordable Housing Checklist Jockey Club response to Appendix 3: Affordable housing checklist. We acknowledge that Appendix 3 provides guidance, but the list does not provide any flexibility around the distribution of affordable housing stating that there should not be a cluster of no greater than fifteen affordable dwellings. There needs to be flexibility surrounding the clustering of affordable homes and	Mr Adam Tuck (Adam J Tuck Ltd) obo Mr J Thomas (Jockey Club)	Noted. The checklist at Appendix 3 is generic guidance and will be applicable to full planning applications for most schemes. If variations to policy requirements or SPD guidance are proposed early discussions with the Strategic Housing Team and RPs are recommended. No change to the SPD is considered necessary

Document Part Name	Summary	Comment (plain text)	Respondent Name	West Suffolk Response (Please Initial)
		<p>this must be judged on a site-by-site basis and will be guided and influenced by the involvement of an RP.</p> <p>Appendix 3 also states that "any amendments to a S106 agreement to reduce or remove affordable housing at a later stage will result in additional costs to you and are unlikely to be considered within the first five years of planning permission being granted" There needs to be flexibility to allow a response to changing market conditions.</p>		