



Saxmundham Town Council

All Members of the **Planning and Development Control Committee** are summoned to attend a meeting on

Wednesday 14th April 2021 using ZOOM at 6.00pm.

(If a member of the public wishes to attend, please contact the Assistant Clerk on the details below)

- 1) Apologies for Absence
To receive apologies for absence.
- 2) Pecuniary/Non-Pecuniary Interests
Councillors to declare any Pecuniary or Non-Pecuniary Interests and Consideration of any requests for dispensation. Notwithstanding this item, Members may subsequently declare an interest at any point in the meeting.
- 3) Minutes of the Previous Meeting
To receive and approve the minutes of the meeting held 22nd February 2021.
- 4) Open Forum
To invite the public to comment on any item on the agenda. The public may not join in the meeting itself.
- 5) To consider the following planning application

Planning ref	Application date	Response deadline	Applicant name and site address	Proposal
DC/21/1255/ADN	23 March 2021	17 May 2021	STC	Fingerpost close to junction of Market Place and High St

- 6) To note any recent decisions on planning applications by East Suffolk Council.
- 7) To discuss and recommend a response to East Suffolk planning protocol survey from Theberton and Eastbridge Parish Council.
- 8) To note and, if appropriate, recommend responses to East Suffolk consultation documents:
 - a) East Suffolk Community Infrastructure Levy Charging Schedule.
 - b) Sustainable Construction Supplementary Planning Document.
- 9) To discuss/report back any concerns or information on energy projects:
 - a) Sizewell C.
 - b) Off-shore windfarms East Anglia One and Two.
- 10) Date and time of next meeting.

J. Morcom **Date: 8th April 2021**
Assistant Clerk to Saxmundham Town Council Tel: 01728 604595 Email: assistanttownclerk@saxmundham-tc.gov.uk



Saxmundham Town Council

Minutes of the Meeting of the Planning & Development Control Committee 6.00 PM 22nd February 2021 by Video Conference

Councillors: Cllr. J. Fisher (Chair) Cllr. C. Hawkins Cllr. N. Hiley

Also Present: J. Morcom (Assistant Town Clerk (ATC))

108/20PD Apologies for absence
None have been received.

109/20PD Pecuniary/Non-Pecuniary Interests
Cllr Fisher declared a non- pecuniary interest in item 5 as he is a member of the Local Advisory board for Saxmundham Free School.

110/20PD Minutes of the Previous Meeting held 8th February 2021
It was unanimously **RESOLVED** to amend minute 106/20PD to strike out the final sentence and then to approve the minutes of the meeting held 8th February 2021. These will be signed when the Chairperson is able to come to the office.

111/20PD Open Forum
No members of the public had joined the meeting.

112/20PD Planning Applications
DC/21/0317/FUL: construction of a new 2-story teaching block at Saxmundham Free School.
The Committee unanimously **RESOLVED** that although it had no objection to the application, it was concerned about loss of light to the back gardens of the houses on Lincoln Road next to the school boundary. The Committee wished to point out that there is no Hurst Road in Saxmundham which is referred to in paragraph 6.16 of the planning statement and presumes that the reference is to Lincoln Ave. The Committee also wished to point out that the boundary to the north of the location plan is inaccurate and should include the entire school car park.

The ATC will pass on these comments to the Planning Department

113/20PD Recent Planning Decisions.
The Committee noted the decisions to permit DC/20/5220/TCA, pollarding of a tree at 12 High St, DC/20/5280/TPO felling one tree and reducing the crown of another at 5 Manor Gardens and DC/20/5142/FUL rear extension to 42 Church Hill. Cllr Fisher informed the Committee that the proposed outbuilding had also been allowed at 42 Church Hill as permitted development.

114/20PD The next meeting of the Planning and Development Control Committee will be at 6pm on Monday 8th March 2021.

The meeting closed at 6.31 p.m.

Jennifer Morcom, Assistant Clerk to Saxmundham Town Council
The Town House, Station Approach
Saxmundham, IP17 1BW

Signed _____ Date _____

Item 6 – Recent East Suffolk Council Decisions

Planning ref	Application date	Response deadline	Applicant name and site address	Proposal	STC response	ESC decision	Appeal date*
DC/20/4835/FUL	3 Dec 2020	24 Dec 2020	34 Church St, Sax, IP17 1EP	Alterations to rear windows	P and D 21 st Dec 22 nd Dec 20 Saxmundham Town Council supports this application because the proposals do not affect the street view, and the design is rational and represents an improvement to the property.	Permitted	

THEBERTON AND EASTBRIDGE PARISH COUNCIL

EAST SUFFOLK COUNCIL – PLANNING PROTOCOL

Introduction

Theberton and Eastbridge Parish Council has concerns about the openness and transparency of East Suffolk Council's planning protocol. We are seeking the views of other Town and Parish Councils about this and the results will be shared with the Suffolk Association of Local Councils and subsequently with East Suffolk Council.

East Suffolk Council's Local Plan appears to be a strong and useful framework for the planning department to work under. In the past, planning applications were mainly determined by planning committees. This gave the planning system credibility by achieving a democratic process and giving us a robust structure to work within. At the same time, it gave the public confidence in the process.

However, in recent years, we are now evidencing a strong movement away from this process resulting in between 90-95% of applications being dealt with behind closed doors, outside the public domain. This has been witnessed by our, and many other, Town/Parish Councils.

This represents a huge imbalance in our system and any process to deal with the vast majority of the applications should be seen as both fair and beyond reproach. It is evident that the process used to consider planning applications (outside those brought to committee) falls well short of the balanced process needed to achieve what would be seen as a fair and equitable process.

Comparison With Other Local Authorities

Theberton and Eastbridge Parish Council has examined systems used by other authorities in their goal to look to achieve a fair and equitable planning system.

Many other authorities have more open planning processes than East Suffolk Council with regard to delegated matters. One example is Cornwall Council which is open to public scrutiny in many ways. Firstly their planning processes are in the form of a flow chart, available on their website, setting out the Planning Protocol for members and local councils. This enables the public to easily follow the due process of planning and be assured that the process is both fair and open. The process also includes a number of fail-safe trigger points in regard to an application's passage and clearly challenges Officers to have regard to the issues around applications and those that represent the public.

Cornwall Council mainly has the same system as East Suffolk Council - the application is received and processed, all statutory bodies and councillors, together with notifiable persons receive notification and must submit observations within 21 days. If there are no issues, both Councils move towards a decision. If there are issues, the District Councillors can consult on their own behalf, or that of the Town/Parish Council, about these matters.

However, after this point, East Suffolk Council's processes clearly move away into a more intransigent mode, in that the District Councillors' comments on behalf of the public and/or Town/Parish Council are noted by the Officers but no further resolution needs to take place and, if an Officer so desires, he/she is allowed to move forward to an Officer led decision.

In Cornwall Council, if there are issues, the Officer contacts the District Councillor to seek a possible resolution and if the Officer agrees to resolve the issues, the application proceeds to be determined through delegated powers. Should these issues not be resolved, the District Councillor can request a Committee Referral and the application is determined by the Planning Committee.

Comparing East Suffolk Council against Cornwall Council, there appears to be no system for Town/Parish Councils to affect the route of the application through the system. Unfortunately the District Councillor is the only person working on behalf of the public and councils who can directly influence the Officer in the direction he/she will take

Why The Current System Is Flawed

East Suffolk Council appear to not even get close to these fail safes on behalf of the public, which would help protect the integrity of our planning system. The next process within East Suffolk Council's planning process would appear that the Officer is left to make their own planning recommendations based on the written information, documents and plans received and he/she would prepare a report to present to the planning sub-committee.

In East Suffolk, sub-committee meetings are held behind closed doors unlike full planning meetings. Two Councillors from the North Area and two Councillors from the South Area attend the meetings which mean that two are considering applications which do not relate to their particular area and the other two may, or may not, have on-the-ground experience of the particular application in question. Our understanding is that these meetings are predominately Officer led, as there appears to be a large percentage of cases where there is little or no local knowledge. Who truly represents the public, who would have meaningful local contributions to make, at these meetings? Unfortunately, the people who could represent the Town/Parish Council's views at that meeting are only allowed to observe and not to speak. The Nolan's Committee 1997 report states "it is essential for proper operation of the planning system that local concerns are adequately ventilated". It is clear within East Suffolk's sub-committees that these matters are not being 'ventilated'. (Ref: Probity in Planning Advice Document. Local Government Association PAS Guidance 2019). This is not the case in a full planning meeting where there is always local and professional input to balance the Officers' views.

As public servants employed by the District Council, the Officers have a duty of care to ensure that they have a positive dialogue with District Councillors, Town/Parish Councils and the public to facilitate and implement planning systems that give the public absolute trust and confidence in the processes they use. At present we believe this is seriously called into question.

Survey

Given the above information, we ask the following questions. Please reply by 7th May 2021, either by answering the questions and/or sharing your views on the process. Please return your answers to parishclerkthebertoneastbridge@gmail.com.

1. Does your Town/Parish Council support East Suffolk Council's planning process in its present form?

YES NO

2. Would your Town/Parish Council or your residents see the present planning process as a wholly open and transparent system, which is beyond reproach?

YES NO

3. Can your District Councillors, in the present planning process, report back to your Town/Parish Council that planning applications of concern have been through due process and had a fair hearing on behalf of the public?

YES NO

4. Do you feel at present there are sufficient trigger points within the present planning process for Town/Parish Councils to have an affect?

YES NO

5. Given the large size of our district (one of the largest in the country) do you think it is appropriate for District Councillors (who are Cabinet Members representing planning) to be involved at Local Planning Committee level, given the potential perception of conflict of interest and predisposition when there is no obvious need?

YES NO

Community Infrastructure Levy Charging Schedule Preparation – consultation on basic assumptions

Consultation period: 12 March to 26 April 2021



EASTSUFFOLK
COUNCIL

March 2021

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East Suffolk CIL Charging Schedule Preparation – consultation text on basic assumptions

March 2021

1 Summary

- 1.1 The Council plans to undertake a formal consultation on the draft CIL Charging Schedule (including the evidence base) in summer 2021. Before that stage, however, the Council has decided to undertake a consultation on the key baseline values and assumptions and the typologies proposed to be used in the Viability Report.
- 1.2 As a largely technical consultation, it is aimed primarily at developers, landowners, surveyors, agents, Suffolk County Council, neighbouring local authorities and key infrastructure providers (such as health bodies and Suffolk Police) but anyone is welcome to respond. Respondents can choose to answer some or all of the questions, but the Council would (where appropriate) prefer answers to be supported by evidence. Confidential information and evidence provided by respondents cannot be taken into account – all information provided will be summarised and will later be made available publicly.
- 1.3 The Council is preparing a new Instalments Policy and is also consulting on this now.
- 1.4 The consultation will run from Monday 12th March to 5pm on Monday 26th April 2021. All the consultation material can be found on the Council's website <https://eastssuffolk.inconsult.uk/CILCS21/consultationHome>.

Background

- 1.5 The detailed information below is based on information produced by Aspinall Verdi for East Suffolk Council.
- 1.6 Delivering the right amount of infrastructure at the right time is a vitally important component in ensuring that development is sustainable. Whilst the amount and type of infrastructure needed varies from site to site, and on the size and type of development, common elements include: new roads, paths, play space and green space; money for additional school places; drainage works/improvements; contributions to community facilities and services (such as health and policing).
- 1.7 There are two complementary approaches to securing necessary infrastructure to support development. Some kinds of infrastructure – typically but not always on-site – and affordable housing are normally secured through a planning obligation, known as a Section 106 agreement or (normally for highways which will be 'adopted' by Suffolk County Council) a Section 278 agreement. If a council wishes to secure developer contributions through the application of Community Infrastructure Levy (CIL), it must set out the delineation between the infrastructure types that will be sought through a S106 agreement and those through CIL. This delineation must be set out in a council's annual Infrastructure Funding Statement

(IFS) and Chapter 4 of [the Council's 2019/20 IFS](#) has a table showing how that split will be applied to unplanned sites (individual Local Plan allocation policies may have a different infrastructure split set out).

1.8 At present, there are two separate CIL Charging Schedules operating in East Suffolk, firstly in the former [Waveney District Council](#) area (which was adopted in 2013) and secondly, in the former [Suffolk Coastal District Council](#) area (which was adopted in 2015). CIL rates in both areas have been increased annually, in line with the Royal Institution of Chartered Surveyors' CIL Index (which is published in November each year). The CIL Charging Schedules set out the amount of CIL liable for different development types, varied by zone (for residential uses).

Introduction

1.9 So long as there is evidence to justify it, differential CIL rates are allowed by the CIL Regulations to ensure that the viability of development is not put at risk. In particular, differential rates can be set for:

- Geographical zones (to reflect differences in land values, for example); and/or
- Types of development (such as residential, retailing, office etc); and/or
- Scales of development (different rates for smaller and larger sites, for example).

1.10 The two existing Charging Schedules both have variable rates in line with the above. The age of the two CIL Charging Schedules and the fact that there are some differences between them, allied to the formal establishment of East Suffolk Council on 1st April 2019, means that the time is right for the Council to prepare a single CIL Charging Schedule for the whole of the East Suffolk district (excluding the parts within the Broads Authority. The Government's Planning White Paper consultation (August-October 2020) proposes a move to a national Infrastructure Levy, but as there is considerable uncertainty about both the precise form that any changes may take, and their timing, the Council is continuing with the preparation of a single CIL Charging Schedule. The [Council's website](#) (<https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>) has further information on the stages and timing of the preparation of the CIL Charging Schedule, as well as more general CIL information.

1.11 The various CIL Regulations, and the [CIL guidance](#), set out how CIL Charging Schedules must be prepared, and the Council is following these requirements. Important in these is that, in preparing its evidence base in order to prepare its draft levy rates, the charging authority should "*collaborate with neighbouring /overlapping authorities (and other stakeholders)*" and that the charging authority should "*collaborate with the local community, developers and other stakeholders, to create realistic and viable charging schedules*".

1.12 As part of the first stage of this work, consultancy Aspinall Verdi has been commissioned to prepare a Viability Appraisal to provide key elements of the evidential

base to underpin the CIL Charging Schedule. Aspinall Verdi has previously prepared the [Suffolk Coastal Viability Report](#) and [Waveney Viability Report](#) to underpin both the [Suffolk Coastal Local Plan](#) (adopted in September 2020) and the [Waveney Local Plan](#) (adopted in March 2019) and so is familiar with the area and its issues. The CIL Viability Report will build on the two Plan-wide Viability Reports, updating key information.

1.13 Work on the Viability Appraisal is advancing. For residential allocations set out in the two adopted Local Plans, a “typology” approach is being practised (with the exception of “strategic” sites; see below). The [Planning Practice Guidance](#) supports the use of typologies for viability assessment purposes – the grouping of similar kinds of allocated sites (by size, location, greenfield/brownfield, development use proposed etc) together and assessing the viability of these “typology” sites, as a proxy for all allocated sites. It is not necessary to demonstrate that each and every individual site would be (or could be) viable.

Viability

1.14 Sites allocated in an adopted Local Plan and/or coming forward as a planning application can sometimes have significant infrastructure requirements, although this obviously varies by scale and type of development and location.

1.15 It is common for at least some of these infrastructure requirements to have to be delivered or paid for early in the lifetime of the development (a new junction might need to be developed to access the site, for example). These costs can have a significant effect on a developer’s cashflow position; in other words, some infrastructure often has to be funded before much or any income has been secured through house and/or flat sales.

1.16 CIL normally has to be paid within a very short period of development commencing and the amount cannot be negotiated, even if the developer believes that paying the full quantum of CIL would potentially make the development unviable. Recognising this, the Council currently has (separate) Instalments Policies for the former [Suffolk Coastal](#) and [Waveney](#) areas: the Instalments Policies allow the payment of each chargeable development to be spread over three separate instalments.

Strategic-scale sites

1.17 The two Local Plans include housing allocations for strategic-scale sites (360-2,000 dwellings, plus other elements). Such sites can often have significant infrastructure requirements and costs over and above the typical infrastructure requirements for smaller sites. For example, a strategic site might be required to deliver/undertake some or all of (this is not necessarily a full list of potential matters for all such sites):

- i) One or more significant new road junctions;
- ii) A site for a new primary school and early years provision, as well as financial contributions to primary school and secondary school places;
- iii) Major drainage and/or flood defence works;

- iv) Community facilities (perhaps including a village hall, local shop etc);
- v) Formal and informal recreation space, playspace and green infrastructure;
- vi) Biodiversity improvements and the provision of Suitable Alternative Natural Greenspace (SANGS).

1.18 Even if a strategic site is viable overall, if the initial costs are too high it can render a site potentially undeliverable (due to cashflow). This can be the case even taking into account the fact that CIL is charged separately for each separate phase of development, and that CIL can be paid in instalments for each separate phase.

1.19 The two Local Plans allocate a number of strategic-scale sites for development. These are:

Suffolk Coastal Local Plan (2020)

- SCLP12.29: South Saxmundham Garden Neighbourhood – approximately 800 dwellings;
- SCLP12.64: Land off Howlett Way, Trimley St Martin – approximately 360 dwellings;
- SCLP12.3: North Felixstowe Garden Neighbourhood – approximately 2,000 dwellings; and
- SCLP12.19: Brightwell Lakes, Martlesham – approximately 2,000 dwellings (which was granted outline planning permission in 2018); this is already zero rated in the current Suffolk Coastal CIL Charging Schedule.

Waveney Local Plan (2019)

- WLP2.16: Land south of The Street, Carlton Colville – approximately 900 dwellings;
- WLP3.1: Beccles and Worlingham Garden Neighbourhood – approximately 1,250 dwellings;
- WLP2.13: North of Lowestoft Garden Village – approximately 1,300 dwellings; and
- WLP2.4: Kirkley Waterfront and Sustainable Urban Neighbourhood – approximately 1,380 dwellings; this is already zero rated in the current Waveney CIL Charging Schedule.

1.20 It is very common for CIL Charging Schedules to consider strategic sites separately from smaller residential sites, with a bespoke approach taken (rather than the ‘typology’ approach). It is also very common for strategic sites to have very low or zero levels of CIL – if development costs increase, the inflexible nature of CIL can mean that such sites might become undeliverable. In the current CIL Charging Schedules, the Brightwell Lakes (Adastral Park) and the Kirkley Waterfront sites are both zero-rated for CIL (£0) and it is considered likely that the CIL rates in the new Charging Schedule for strategic sites will be low or zero.

1.21 Aspinall Verdi has been in contact with the promoters of the strategic sites and is in the process of undertaking bespoke viability assessments of each site.

Do you have any comments on the proposed approach to 'strategic' sites? Yes/No/Don't know. Please provide any information/evidence to support your answer

2 Residential

Typologies

2.1 The following typologies are proposed to be used, based on representative samples of the residential allocations made in the Waveney Local Plan and the Suffolk Coastal Local Plan and various 'made' Neighbourhood Plans. Figure 1 shows a map of allocated sites in the two Local Plans and whilst the typologies do not match these allocations exactly, they do cover a broad range of site-types. They will cover a range of sites across the two districts:

- i) geographically (from the Lowestoft area through coastal and inland market towns and villages towards the edge of Ipswich), thus encompassing a wide range of different viability areas;
- ii) size-wise (a smaller 17-home typology through to a proposed 255-home typology);
- iii) density-wise (less-dense though to denser sites);
- iv) variations of dwelling sizes and mixes within certain typologies (using relevant Local Plan policies on housing size and bedroom number mix); and
- v) both greenfield and brownfield (previously developed) sites:

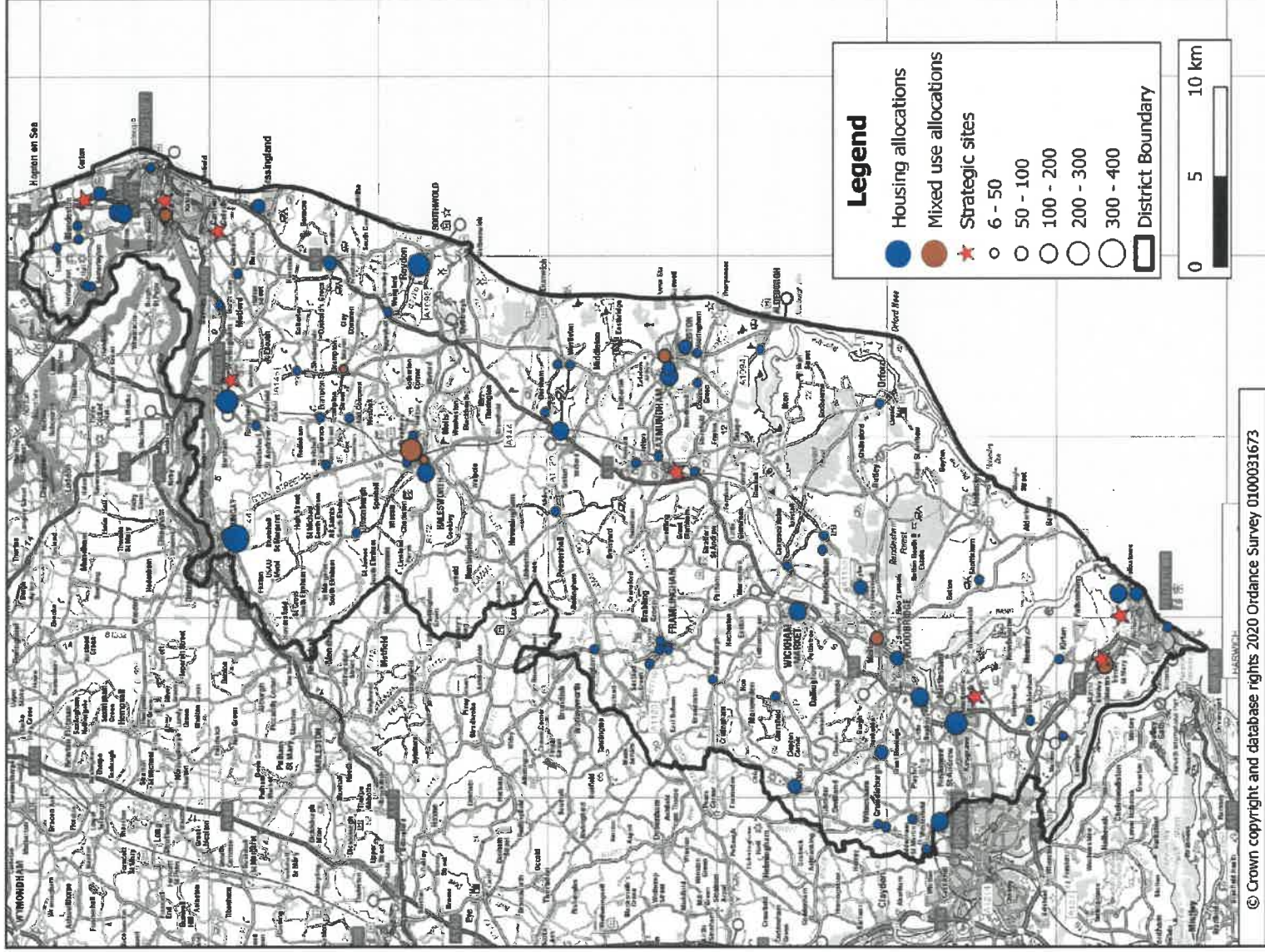


Figure 1 – Distribution of residential development growth in the Suffolk Coastal Local Plan, Waveney Local Plan and various ‘made’ Neighbourhood Plans

2.2 The two Whole Plan Viability Reports (for the former Waveney and Suffolk Coastal areas) prepared by Aspinall Verdi identified various different Value Zones (see below). Further work is taking place on updating values and preparing a single set of value zones for the whole of the district, but it is not thought likely that there have been major changes to relative values (i.e. between different value areas).

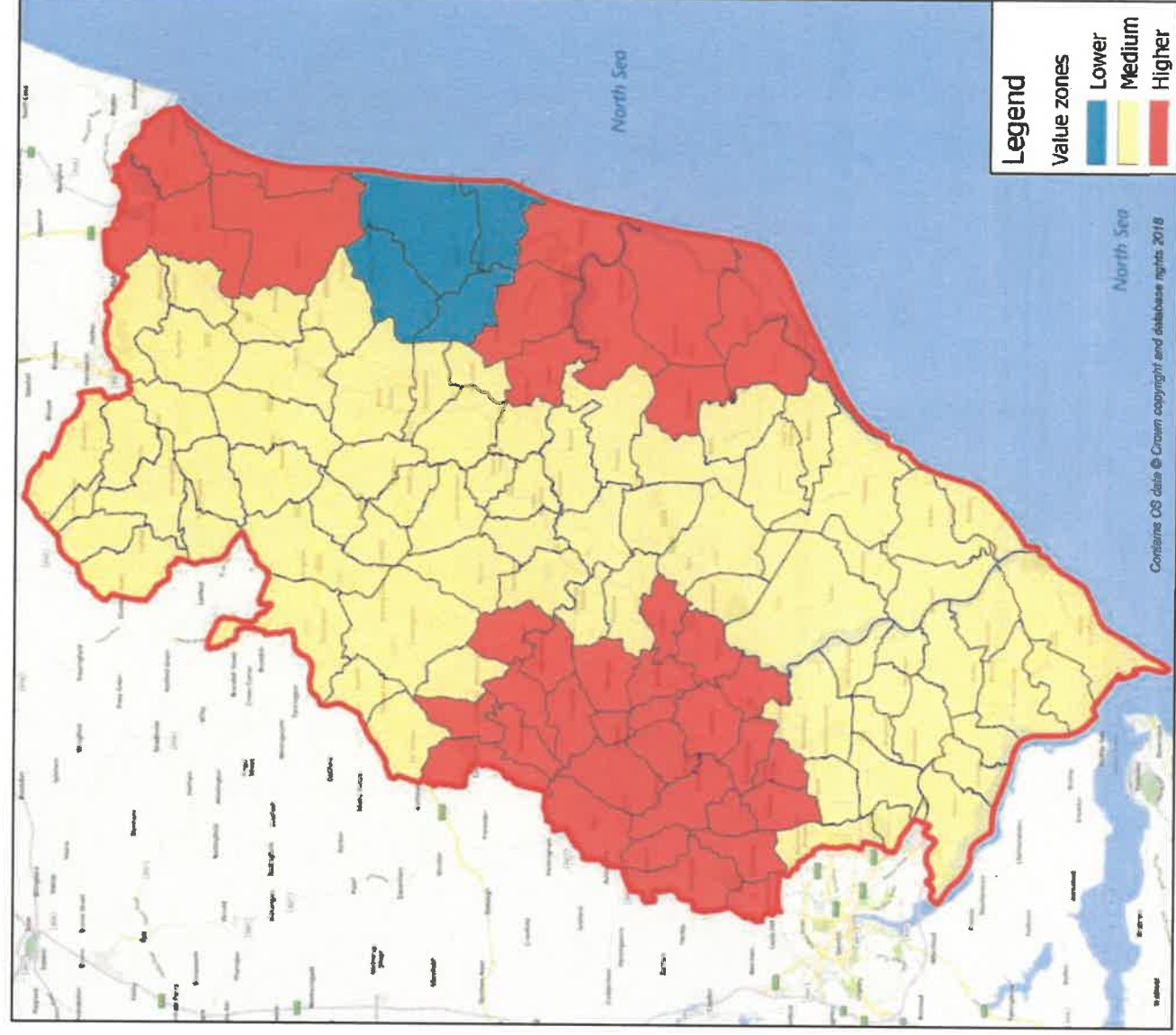


Figure 2 – 2019 Value Zones for the (former) Suffolk Coastal area (taken from the 2019 Aspinall Verdi Plan-Wide Viability Study)

50	2.54	20	85%	2.16	23
76	5.08	15	85%	4.31	18
102	4.43	23	80%	3.54	29
140	4.55	31	75%	3.41	41
145	6.75	21	75%	5.07	29
170	6.06	28	75%	4.54	37
255	15.76	16	75%	11.82	22

Do you have any comments on the proposed approach to greenfield residential typologies? Yes/No/Don't know. Please provide any information/evidence to support your answer

2.4 Brownfield

Units	Gross site area (ha)	Gross dwellings per ha (dph)	Gross to net ratio	Net site area (ha)	Net dph
8	0.22	36	90%	0.2	40
42 (flatted)	0.86	49	100%	0.86	49
45 (flatted)	0.72	63	100%	0.72	63
51 (flatted)	0.73	70	100%	0.73	70
100 (flatted)	1.27	79	100%	127	79
100	4.43	23	80%	3.55	28
300	10.57	28	85%	33	41

Do you have any comments on the proposed approach to brownfield residential typologies? Yes/No/Don't know. Please provide any information/evidence to support your answer

Baseline assumptions

2.5 Many of the cost values and assumptions are unaltered from the two Local Plans' Viability Appraisals (both prepared by Aspinall Verdi), which were important evidence base information sources for the Local Plan examinations.

2.6 Many of the cost assumptions are drawn from the Building Cost Information Service (BCIS) index, which is operated by the Royal Institute of Chartered Surveyors (RICS) and publishes typical/average costs for building, on a local authority basis (using cost submissions made by developers and builders). This is a well-used information source for construction/build costs, and although not perfect (it is known, for example, that not all developers submit their costs), it has a significant degree of robustness and credibility. At present (2021), BCIS indices are still published separately for Suffolk Coastal and Waveney rather than as a single East Suffolk figure. Where appropriate, and where a single district-wide figure is needed, the most conservative assumption is used – which is normally the (higher) costs in Suffolk Coastal.

2.7 The tables below also show the values assumed in the two Local Plan Viability Reports and explain which values are assumed for the purposes of this CIL Viability Report.

2.8 Land and residential values are not included below, but up-to-date figures will be included in the draft Viability Assessment underpinning the draft CIL Charging Schedule and any views on land and sales values will be welcomed.

Residential cost assumptions

2.9 *Build cost – houses*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£1,198 per m ²	£1,146 per m ²	£1,152 per m ²	A conservative approach is taken here, with the up-to-date (2021) BCIS figure for Suffolk Coastal used

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.10 *Build cost – flats*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment

£1,386 per m ²	£1,339 per m ²	£1,288 per m ²	A conservative approach is taken here, with the up-to-date (2021) BCIS figure for Suffolk Coastal used
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Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.11 External works for services and infrastructure

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
15% of BCIS build costs	15% of BCIS build costs	15% of BCIS build costs	External works costs will vary from site-to-site, but this figure is based on industry norms and other schemes coming forward in the district and allows for the cost of garages

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.12 Site abnormalities

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£110,000 per net developable acre or £270,000 per hectare (if brownfield)	£110,000 per net developable acre or £270,000 per hectare (if brownfield)	£110,000 per net developable acre or £270,000 per hectare (if brownfield)	Site abnormalities will vary significantly from site-to-site but the allowance includes the cost for demolition and remediation. Homes England (previously HCA) guidance on dereliction, demolition and remediation costs (March 2015), along with

			comparable and other schemes coming forward in the district. Any site-specific costs which are greater than assumed in this study will need to be reflected in a reduced land value
			For greenfield sites this is assumed to be £0 – any unusual costs will need to be reflected in a reduced land value

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.13 Professional fees (such as for architects, highways consultants, ecologists etc)

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
8% of BCIS build costs	10% of BCIS build costs	10% of BCIS build costs	This typically ranges from 8-12% (based on industry norms and other schemes coming forward). A figure of 10% is used – any higher fees will be reflected in a reduced land value

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.14 Statutory planning application fees

National planning application fees are assumed.

Do you agree with this assumption? Yes/No. Please provide any further information/evidence to support your answer

2.15 *Planning application professional fees, surveys and reports*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
3 x the planning application fee	3 x the planning application fee	3 x the planning application fee	Reasonable figure as reflects the size of scheme and professional fees allowed for

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.16 *Contingency costs*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
5% of all construction costs	5% of all construction costs	5% of all construction costs	This typically ranges from 3%-5%, based on industry norms and other schemes coming forward. A conservative approach of 5% is used here

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.17 *RAMS (Recreational Disturbance Avoidance Mitigation Strategy) contribution*

This is a contribution required from 'qualifying' residential development to help mitigate the effects on sites of European nature conservation significance (Special Areas of Conservation and Special Protection Areas), as detailed in the Habitats Regulations Assessment – see <https://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/>. The cost depends on which RAMS zone the development is in – Zone B currently costs £321.22 per dwelling and Zone A currently costs £121.89 per dwelling.

For all qualifying development there is no alternative but to provide mitigation and the RAMS costs are therefore applied to all qualifying development. There cannot therefore be a Yes/No question on this amount of the charge. However, please provide any comments on this matter if you wish

2.18 *Facilitating Independent Living*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£521 per dwelling (50% of dwellings need to meet the requirement for accessible and adaptable dwellings under Part M4 (2) of the Building Regulations)	£521 per dwelling (5% of all units on schemes of 20+ dwellings tested to meet the Part M4 (2) standard	£521 per dwelling (50% of dwellings tested to meet the requirement for accessible and adaptable dwellings under Part M4 (2) of the Building Regulations)	The final Waveney Local Plan policy requires 40% on all schemes of 10+ dwellings. The increased provision is reflected in updated cost assumptions but the figure of £521 per unit (taken from the DCLG Housing Standards Review, Final Implementation Impact Assessment paras 153 and 157, March 2015)

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.19 *Water efficiency*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£9 per dwelling	£9 per dwelling	£9 per dwelling	This is to require water efficiency of 110 litres per person per day (based on MHCLG Standards

			Review Cost Impact, by EC Harris, September 2014)
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Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.20 Carbon dioxide & energy obligations

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
3% of BCIS build costs	N/A	3% of BCIS build costs	<p>SCLP policy 9.2 ('Sustainable Construction') requires developments of more than 10 dwellings to have energy efficiency standards resulting in a 20% reduction in CO₂ emissions below the Target CO₂ Emission Rate (TER) set out in Park L of the Building Regulations. WLP policy 8.28 ('Sustainable Construction') covers similar territory.</p> <p>The 3% figure is taken from the Evora Edge report for Guildford Borough Council Assessment of the Viability of Carbon Emission Targets for New Builds – Main Report (2017)</p>

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.21 *Selling agents' costs*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
1.5% of GDV	1.5% of GDV	1.5% of GDV	Taken from p35 of the Harman Report (2012) and comparable schemes

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.22 *Sale legal costs*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
0.5% of Gross Development Value (GDV)	0.5% of GDV	0.5% of GDV	Taken from p35 of the Harman Report (2012) and comparable schemes

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.23 *Scheme marketing and promotion*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
1.5% of GDV	1.5% of GDV	1.5% of GDV	Taken from p35 of the Harman Report (2012) and comparable schemes

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.24 Profit on market housing

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
20% on GDV	20% on GDV	20% on GDV	Paragraph 018 (Reference ID: 10-018-20190509, 9 May 2019) in the PPG on Viability says that “...an assumption of 15-20% gross development value may be considered a suitable return to developers in order to establish the viability of plan policies...” A figure at the top end of this range is used, for robustness – there is little evidence to suggest that a different figure should be used

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.25 Profit on affordable housing

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
6% on GDV	6% on GDV	6% on GDV	Paragraph 018 (Reference ID: 10-018-20190509, 9 May 2019) in the PPG on Viability says that “...A lower [developer’s return] figure

			<i>[than for a market scheme] may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk..."</i>
			The 6% figure reflects industry norms

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.26 Interest

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
6.5%	6.25%	6.5%	This figure is based on industry norms and other schemes coming forward in East Suffolk. The higher Suffolk Coastal figure of 6.5% is used

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.27 Stamp Duty Land Tax on land value

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment

5%	5%	5%	"Slabbed" figure used (i.e. the amount on the whole purchase price) rather than a "sliced" approach (different percentages applied on the amount depending on the SDLT rate)
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Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.28 Agents fee on land value

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2020	Comment
1%	1%	1%	This figure is based on industry norms and other schemes coming forward in East Suffolk

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.29 Legal fee on land value

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2020	Comment
0.5%	0.5%	0.5%	This figure is based on industry norms

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.30 Land values

Land values obviously vary across the district, with lower-value areas like parts of Lowestoft, and much higher value areas such as Aldeburgh. These will be assessed in spring 2021.

Do you have any comments to make on land values in the district? Yes/No. Please provide any further information/evidence to support your answer

2.31 Sales values

Sales values obviously vary across the district, with lower-value areas like parts of Lowestoft, and much higher value areas such as Aldeburgh. The housing market has shown resilience following the Covid-related construction industry shut-down in spring 2020, with January 2021 prices being 5.4% higher than January 2020 (Halifax Bank national figure). However, there remain wider-than-normal economic (and housing market) uncertainties due to the post-Brexit arrangements and the ongoing Covid pandemic and property agency [Savills predicts](#) that values in the East of England will see “little, if any” housing growth during 2021. Sales values will be assessed in spring 2021.

Do you have any comments on sales values in the district? Please provide any information/evidence to support your answer

2.32 Biodiversity net gain

The UK Government announced new English developments will be required to demonstrate a 10% increase in biodiversity on or near development sites. The Environment Bill (which will introduce this) has been delayed several times and Royal Assent is not now expected until after the summer recess in 2021. It remains unclear exactly when the targets for net biodiversity gain will come into effect.

This is assumed to be £42,545 per gross hectare of development land – greenfield scenarios only. Cost calculated on gross site area. Reliance for this figure has been placed upon the calculation set out in the [Biodiversity Net Gain and Local Nature Recovery Strategies](#) document (2019).

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.33 *Affordable housing value inputs*

	Affordable rent	Shared ownership	Discounted ownership
% of open market value	50%	75%	60%

Do you agree with this figure? Yes/No. Please provide any information/evidence to support your answer

2.34 *Build-out rates*

It is assumed that a typical build-out rate is two market units per month for the typologies to be used in the Viability Assessment (with developers building to sale, rather than more speculatively; in other words, the expected rate of sale is also two per month), with a typical lead-in time of six months to the start of construction. All sites are assumed to have a minimum 12-month build-out time. As stated above, the largest, strategic-sized, sites, are being assessed individually and will normally have a longer lead-in time but a higher rate of sales.

Do you agree with these figures? Yes/No. Please provide any information/evidence to support your answer

2.35 *CIL and Section 106 agreements*

These are treated as viability output, with the Council deciding on an annual basis (in its Infrastructure Funding Statement) which infrastructure should be funded through CIL and which through S106. The first IFS (for 2019/20) was published in December 2020 – see <https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/>.

The Waveney and Suffolk Coastal Infrastructure Delivery Frameworks have specific cost advice for S106 obligations on larger sites which will be reflected in the viability assessment. Site specific mitigation on generic scenarios will vary from site-to-site and will need to be met by any viability surplus generated.

if you have any other comments on residential accommodation viability testing, please make them here:

3 Holiday accommodation viability testing

3.1 In the current CIL Charging Schedules, holiday accommodation in the Suffolk Coastal area is either charged at the standard residential rate or is not liable for CIL at all (as appropriate). The current (2021) charge for holiday lets in the Waveney is £59.46 per m².

The main holiday accommodation typologies proposed to be tested are:

Scenario	Unit size m ² (gross internal area)	Unit sale price/ weekly rate	£ per m ² /yield
New build holiday let	75	£500	5%
Barn conversions/ change of use holiday let	75	£500	5%
Caravans	2-bed: 74 3-bed: 90	2-bed: £100,000-£200,000 3-bed: £150,000-£300,000	2-bed: £740-£2,700 3-bed: £1,666-£3,333

Do you agree with these figures? Yes/No/Don't know. Please provide any further information/evidence to support your answer

3.2 Build costs are assumed to be the same as for normal residential properties (see Chapter 2 above), with the exceptions below:

Element	Cost per m ²	Comment
Flats	£1,411	Based on median BCIS costs for flats for Suffolk Coastal, using a 5-year sample to reflect current building regulations
Barn conversions	£1,390	BCIS upper quartile estate housing – 5-year sample, rebased to Suffolk Coastal. We have adopted upper quartile build costs to reflect higher build costs when converting barns due to structural deficiencies often being found
Holiday lodges	£600-£1,082	Based on research, the cost of Mountain Lodge Homes, reconciled with the lowest observed BCIS, cost for residential development rebased to Suffolk Coastal

Management costs	50% of turnover	For new build and conversion holiday let appraisals
Occupancy rate	60%	
Build timescale	12 months	Assumed for all typologies

Do you agree with these figures? Yes/No/Don't know. Please provide any information/evidence to support your answer

3.3 CIL and Section 106 agreements

These are treated as viability output, with the Council deciding on an annual basis (in its Infrastructure Funding Statement) which infrastructure should be funded through CIL and which through S106. The first IFS (for 2019/20) was published in December 2020 – see <https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/>.

The Waveney and Suffolk Coastal Infrastructure Delivery Frameworks have specific cost advice for S106 obligations on larger sites which will be reflected in the viability assessment. Site specific mitigation on generic scenarios will vary from site-to-site and will need to be met by any viability surplus generated.

If you have any other comments on holiday accommodation viability testing, please make them here:

4 Specialist residential accommodation testing

4.1 There are three main types of specialist residential accommodation:

- i) **sheltered housing** – accommodation for sale or rent to (normally) elderly people, often (but not always) with estate management services, emergency alarm system and warden service);
- ii) **extra-care housing** (also known as ‘assisted living’) – independent living, but normally with personal care and support services available on-site 24 hours a day; and
- iii) **nursing/residential care home** – all meals and care are provided on site with no independent living.

4.2 The two Local Plans recognise the need for this kind of accommodation, whether standalone or as part of a larger development. Three typologies are proposed, all based on standalone sites (as these are the most likely to come forward and be developed by specialist developers):

Type	No. units	Development density per net hectare	Dwelling mix	Unit size	Internal gross to net
Sheltered housing	50	Greenfield: 80 Brownfield: 120	75% 1-bed 25% 2-bed	55m ² 1-bed 75m ² 2-bed	75%
Extra-care housing	50	Greenfield: 80 Brownfield: 120	75% 1-bed 25% 2-bed	55m ² 1-bed 75m ² 2-bed	70%
Nursing/residential care home	60	70 rooms per hectare	Single en-suite	N/A	50%

Do you agree with these figures? Yes/No/Don't know. Please provide any further information/evidence to support your answer

4.3 The proposed cost assumptions for specialist residential accommodation are the same as standard residential (see Chapter 2 for details) with the exception of those below:

Element	Cost	Source
Build costs	£1,646 per m ²	2020 BCIS median build costs for care homes in Suffolk Coastal (costs are higher there than in Waveney, so the conservative value is used)
Marketing	5% of market value	Comparable scheme analysis shows higher costs over 'general needs market housing'. Cost allowance assumed still in line with the Harman report (P.35) but at higher end
Purchasers' costs (<i>nursing homes only</i>)	5.76% of GDV	Industry standard

Do you agree with these figures? Yes/No/Don't know. Please provide any information/evidence to support your answer

4.4 Building and sales period assumptions

Type	Lead-in period	Development period	Sales period
Sheltered housing	6 months	18 months	18 months (on practical completion)
Extra-care housing	6 months	18 months	18 months (on practical completion)
Nursing/residential care home	6 months	24 months	Investment sold on practical completion. But a 30 month rent free period included to account for occupancy 'build up period'

Do you agree with these figures? Yes/No/Don't know. Please provide any information/evidence to support your answer

4.5 CIL and Section 106 agreements

These are treated as viability output, with the Council deciding on an annual basis (in its Infrastructure Funding Statement) which infrastructure should be funded through CIL and which through S106. The first IFS (for 2019/20) was published in December 2020 – see <https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/>.

The Waveney and Suffolk Coastal Infrastructure Delivery Frameworks have specific cost advice for S106 obligations on larger sites which will be reflected in the viability assessment. Site specific mitigation on generic scenarios will vary from site-to-site and will need to be met by any viability surplus generated.

If you have any other comments on specialist residential accommodation viability testing, please make them here:

5 Retail, office and industrial development

5.1 The two Local Plans identify a range, or amount, of convenience and comparison floorspace over the Plan period, with a number of allocations proposing retail as part of a broader mix. One example is the Kirkley Waterfront and Sustainable Urban Neighbourhood (Waveney Local Plan Policy WLP2.4), which requires part of the 60-hectare site to contain a local retail centre (although a precise quantum is not specified).

Convenience retail

5.2 Given changes to food (convenience) retailing in recent years, it is considered highly unlikely that any large new supermarkets will be proposed for the foreseeable future (on the scale of a Tesco Extra, for example). It is considered much more likely that smaller foodstores would come forward, either “corner-shop”-type units (Express, 350 m² gross internal area, 20% site coverage, gross-to-net ratio 90%), or medium-scale stores of the kind that operators like Co-op, Aldi and Lidl might perhaps seek (Budget, 2,000 m² GIA, 35% site coverage, gross to net ratio 85%).

5.3 These following assumptions and judgements are made, which are not thought to vary significantly across East Suffolk:

Scenario	Gross internal area (m ²)	Site coverage	Rent (per ft ²)	Yield	Lead-in period	Development (build) period	Initial rent-free period
Express	350	20%	£18	5.9%	6 months	9 months	9 months
Budget	2,000	35%	£15	5.9%	6 months	9 months	9 months

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

Comparison retail

5.4 The comparison retail market is in a state of flux with currently very limited new store requirements in the market (due to greater shopping online and the effects of the Covid-19 pandemic). Two scenarios are proposed to represent a local/regional retailer and national retailer (both with 40% site coverage):

- Smaller format – 500 sqm / 90% net to gross
- Larger format – 1,000 sqm / 85% net to gross

Scenario	Gross internal area (m ²)	Site coverage	Rent (per ft ²)	Yield	Lead-in period	Development (build) period	Initial rent-free period
Smaller format	500	40%	£20	5.9%	6 months	9 months	12 months
Larger format	1,000	40%	£18	5.9%	6 months	9 months	12 months

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

Office and industrial development

5.5 Employment allocations are made in the two Local Plans (either standalone or as part of strategic-scale development). Two scenarios are proposed for testing CIL viability, one for office and one for industrial.

Scenario	Gross internal area (m ²)	Site coverage	Rent (per ft ²)	Yield	Lead-in period	Development (build) period	Initial rent-free period
Office	500	40%	£20	5.9%	6 months	12 months	12 months
Industrial	1,000 (single building or sub-divided)	40%	£8	6%	6 months	12 months	12 months

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

Development costs for retail, office and industrial development

5.6 The assumptions and values are the same for retail, office and industrial development, with the exception of build costs:

5.7 *Build costs – convenience retail*

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£1,390 psm	£1,424 psm	£1,427 psm	BCIS median build costs supermarkets, re-based for Suffolk Coastal. Suffolk Coastal builds costs are currently higher than Waveney. The higher figure is used

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.8 Build costs – comparison retail

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£1,048 psm	£731 psm	£1,137 psm	BCIS median build costs shops, re-based for Suffolk Coastal. Suffolk Coastal builds costs are currently higher than Waveney. The higher figure is used

5.9 Build costs – office

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£1,673 psm	£1,577 psm	£1,728 psm	BCIS median build costs for offices, re-based for Suffolk Coastal: Suffolk Coastal

				builds costs are currently higher than Waveney. The higher figure is used
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5.10 Build costs – industrial

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£876 psm	£991 psm	£803 psm	BCIS median build costs for warehouses/store, re-based for Suffolk Coastal. Build costs have fallen since the earlier Viability Studies

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.11 External works for services and infrastructure

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
15% of BCIS build costs	15% of BCIS build costs	15% of BCIS build costs	External works will vary, depending on site requirements. Based on industry norms and other schemes coming forward in the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.12 Site abnormalities

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
£110,000 per net developable acre (if brownfield)	£110,000 per net developable acre (if brownfield)	£110,000 per net developable acre (if brownfield)	Site abnormalities will vary significantly from site to site. Allowance includes the cost for demolition and remediation. We have had regard to HCA (now Homes England) guidance on dereliction, demolition and remediation costs March 2015, along with comparable and other schemes coming forward in the District. Any site-specific costs which are greater than that assumed in this study will need to be reflected in a reduced land value

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.13 Professional fees

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
8% of BCIS build costs	8% of BCIS build costs	8% of BCIS build costs	Typically ranges between 8% - 12%, based on industry norms and other schemes coming forward. Any higher professional fees will be reflected in a reduced land value

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.14 Contingency

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
5% of all construction costs	5% of all construction costs	5% of all construction costs	Typically ranges between 3% - 5%, based on industry norms and other schemes coming forward

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.15 Letting agent costs

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
10%	10%	10%	Based on industry norms and other schemes coming forward on the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.16 Letting legal costs

Suffolk Coastal Viability Study	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment

(December 2018)			
5%	5%	5%	Based on industry norms and other schemes coming forward on the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer.

5.17 Investment sale agent's costs

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
1%	1%	1%	Based on industry norms and other schemes coming forward on the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.18 Marketing and promotion

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
1%	1%	1%	Based on industry norms and other schemes coming forward on the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.19 Profit

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
20% profit on build costs	20% profit on build costs	20% profit on build costs	The PPG on Viability (ref: 10-018-20190509) says that 15-20% of GDV “may be a suitable return to developers”

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.20 Interest

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
6.5%	6.5%	6.5%	Industry norms and other schemes coming forward in the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.21 Finance fee

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
1%	1%	1%	Industry norms and other schemes coming forward in the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.22 Stamp Duty Land Tax on land value

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
5%	5%	5%	"Slabbed" figure used (i.e. the amount on the whole purchase price) rather than a "sliced" approach (different percentages applied on the amount depending on the SDLT rate)

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.23 Agent's fee on land value

Suffolk Coastal Viability Study (December 2018)	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment
1%	1%	1%	Industry norms and other schemes coming forward in the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.24 Legal fee on land value

Suffolk Coastal Viability Study	Waveney Viability Study (March 2018)	CIL Viability Testing 2021	Comment

(December 2018)			
0.5%	0.5%	0.5%	Industry norms and other schemes coming forward in the District

Do you agree with these figures and assumptions? Yes/No/Don't know. Please provide any information to support your answer

5.25 CIL and Section 106 agreements

These are treated as viability output, with the Council deciding on an annual basis (in its Infrastructure Funding Statement) which infrastructure should be funded through CIL and which through S106. The first IFS (for 2019/20) was published in December 2020 – see <https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/>.

The Waveney and Suffolk Coastal Infrastructure Delivery Frameworks have specific cost advice for S106 obligations on larger sites which will be reflected in the viability assessment. Site specific mitigation on generic scenarios will vary from site-to-site and will need to be met by any viability surplus generated.

If you have any other comments on retail and employment land viability testing, please make them here:

6 If you have any other comments on the preparation of the East Suffolk CIL Charging Schedule, please make them here:

**Sustainable Construction
Supplementary Planning Document
Initial Consultation Document**

Consultation Dates Monday 15th March – 5pm Monday 26th
April 2021



EASTSUFFOLK
COUNCIL

About this consultation

The Sustainable Construction Supplementary Planning Document will provide guidance on a range of topics to support the implementation of East Suffolk Local Plan policies. Once adopted by the Council, the document will be a material consideration in the determination of planning applications.

This is the first stage of consultation to gather feedback on what you think the document should include and address. Please submit your comments by 5pm on Monday 26th April 2021.

The Supplementary Planning Document (SPD) will apply to the whole of East Suffolk, apart from the area within the Broads National Park, for which the Broads Authority is the Local Planning Authority.

The Purpose of the Sustainable Construction Supplementary Planning Document

The Sustainable Construction SPD will provide guidance on a range of topics including energy efficiency, renewable energy, water conservation, sustainable transport and use of materials, to support the implementation of the Local Plan policies.

The Sustainable Construction SPD will not set building standards. The energy efficiency of all new and renovated buildings for residential and non-residential use is covered by Building Regulations and all developers must build and renovate to current Building Regulation standards. The setting of Building Regulations is not within the control of the Council. Local Planning Authorities can, however, through planning policy in Local Plans, set energy performance standards for new housing that are higher than Building Regulations, but only up to the equivalent of Level 4 of the, now withdrawn, Code for Sustainable Homes (approximately 20% above current Building Regulations), as has been undertaken in the Suffolk Coastal Local Plan.

The Government's Future Homes Standard plans to require new homes to have low carbon heating and increased energy efficiency. These proposed changes could impact Building Regulations, planning policy and guidance. Should any changes be introduced during the production of the SPD these will be taken on board, as necessary and appropriate.

The Sustainable Construction SPD will provide guidance in relation to the following policies contained in the Council's adopted Local Plans:

[Suffolk Coastal Local Plan \(September 2020\)](#):

- SCLP9.1: Low Carbon and Renewable Energy
- SCLP9.2: Sustainable Construction
- SCLP9.6: Sustainable Drainage Systems

- SCLP9.7: Holistic Water Management

Waveney Local Plan (March 2019):

- WLP8.27: Renewable and Low Carbon Energy
- WLP8.28: Sustainable Construction

Once adopted, the Sustainable Construction Supplementary Planning Document will replace the following document:

- Renewable Energy and Sustainable Construction Supplementary Planning Document (September 2013) – this relates to the former Waveney local planning authority area.

Next Steps

Following consideration of the responses received to this initial consultation, a draft SPD will be prepared and published for public consultation later in 2021. The draft SPD will be supported by Strategic Environmental Assessment, Habitats Regulations Assessment and Equality Impact Assessment screening opinions and where necessary full assessments.

Proposed Content of the SPD

The document is to be organised into sections that address issues related to specific environmental issues. These issues are not mutually exclusive, and some sections may need to be read in conjunction with others. The text below provides a brief overview of the different sections proposed:

Section 1: Introduction

Provides background information on the purpose of the document, the Council's commitment to fighting climate change, and what sustainable construction is.

Section 2: Planning Policy Guidance

Provides background information on the planning policy context and evidence base underpinning the Council's policies.

1. National Planning Policy Context
2. National Planning Policy
3. Suffolk Coastal Local Plan Policy
4. Waveney Local Plan Policy
5. Evidence Base
6. Role of Neighbourhood Plans

Section 3: Guidance for submitting planning applications

This section should be read in conjunction with all other parts of the document by those who intend to submit a planning application.

1. Summary of climate change requirements for applications in the former Suffolk Coastal area
2. Summary of climate change requirements for applications in the former Waveney area
3. Viability and feasibility
4. Energy Statement – Demonstrating a 20% reduction in CO₂ emissions below the Target CO₂ Emission Rate
5. Sustainability Statement requirements
6. Water efficiency confirmation / requirement
7. Sustainable Drainage Strategy requirements

Section 4: Guidance for developers

This section will clarify how new building can achieve higher environmental standards and comply with policies on Sustainable Construction. Much of the information in this section is equally applicable to both new and existing buildings. The topics are:

1. Renewable and Low Carbon Energy schemes
 - 1.1. Types of stand-alone and large-scale renewable energy technologies
 - 1.2. Community-led renewable and low carbon energy scheme

- 1.3. Identify suitable areas for renewable and low carbon energy development.
2. Energy efficiency and carbon reduction
 - 2.1. Building Regulations
 - 2.2. Energy hierarchy
 - 2.3. Listed Buildings and historic environment.
3. Small Scale Renewable Energy for residential and commercial properties.
 - 3.1. Solar PV
 - 3.2. Solar Thermal
 - 3.3. Air source heat pump
 - 3.4. Ground and water source heat pumps
 - 3.5. Small scale wind turbines
 - 3.6. Biomass burners
 - 3.7. Micro combined heat and power system
 - 3.8. Renewable energy technology and historic buildings
 - 3.9. Listed Building Consent
 - 3.10. Article 4 directions
 - 3.11. Market based incentives for energy
4. Construction standards (BREEAM)
5. Water Conservation.
6. Sustainable drainage systems.
7. Sustainable Travel.
8. Materials and Construction Waste.
9. Siting and Orientation.
10. Natural Ventilation
11. Pollution and noise
12. Sustainable design
 - 12.1. Benefits of designing for current and future needs reducing the requirement for retro fitting, future adaptation and demolition.
 - 12.1.1. Meeting the needs of an aging population.
 - 12.1.2. Healthy Homes.

Section 5: Monitoring

This section will discuss how the Council will monitor policies related to sustainable design and construction. This will enable the Council to identify the effectiveness of the policies and if they need to be reviewed to assist with delivering the objectives set out in the Local Plans.

Section 6: Case Studies in Suffolk

This section will provide examples of how new and old buildings can achieve high environment standards.

Appendix

This section will include the Council's [Environmental Guidance Note](#). The guidance note offers clear, concise information on a range of key environmental issues relating to the building industry, however does not have the statutory weight of a Supplementary Planning Document. The guidance will assist those seeking to mitigate the impact of construction on climate change by offering support and advice on a range of key environmental issues. The environmental guidance was endorsed by the Council at the Full Council meeting on 25 November 2020.

Questions

1. Do you consider that the proposed content is appropriate?

Yes/No

If no, please suggest how the scope and content should be amended.

2. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD \(2013\)](#) that should be retained?

Please provide details.

3. Are there any elements of the existing [Renewable Energy and Sustainable Construction SPD \(2013\)](#) that should not be retained?

Please provide details.

4. Are there any specific elements of the Local Plan policies that you consider require further guidance in the document?
If yes, please explain what guidance is required.

5. Are there any elements of national policy on sustainable construction that you consider require additional guidance in the document?
If yes, please explain what guidance is required.

6. What specific sustainable design and construction measures do you consider could be incorporated in developments of 10 or more new dwellings?

7. What specific sustainable design and construction measures do you consider could be incorporated in new commercial properties of 1,000sqm gross floorspace or more?

8. Do you have any views on sustainable design and construction that you consider should be addressed in the document?

9. Do you have any views the Council's [Environmental Guidance Note](#) being included as an Appendix within the SPD?

**10. Are you aware of any good practice from elsewhere that could be applied in East Suffolk?
If yes, please provide details.**

11. Are you aware of any examples of good sustainable design and construction in East Anglia that could be used as a case study within the Sustainable Construction SPD?

12. Please let us know if you have any other comments

Title

First Name

Surname

Organisation

**Job title/position
Within the organisation**

Address

Postcode

Email Address

**Add my details to the
Local Plan mailing list**

Please respond to this consultation by 5pm on Monday 26th April 2021, via one of the following means:

- Complete the questionnaire online
<https://eastssuffolk.inconsult.uk/SustConSPD/consultationHome>
- Email your response to planningpolicy@eastssuffolk.gov.uk; or
- Post your response to Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

The information you have supplied is being collected in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and will be used to inform the preparation and Adoption of the Supplementary Planning Document.

By responding to this consultation, you are accepting that your name and response will be made available for public inspection and published online in accordance with the Act stated above. However, other personal information such as email addresses and telephone numbers will not be published or shared with third parties. Your personal information will be retained until the Supplementary Planning Document is superseded + 1 year (local retention policy).

Data will be processed and held securely and in accordance with the Data Protection Act 2018 and General Data Protection Regulation (and any updates).

Further information about data protection and your rights can be found in our Privacy Notice on the East Suffolk Website www.eastssuffolk.gov.uk/yourcouncil/access-to-information/general-data-protection-regulation-and-data-protection-act/gdpr-privacy-notice/

Item 9a Sizewell Cⁱ

Project timeline

1. Statement of community consultation
2. Stage 1 consultation
3. Updated statement of community consultation
4. Stage 2 consultation
5. Stage 3 consultation
6. Stage 4 consultation
7. Review of Stage 4 responses
8. **Application submission (CURRENT STAGE)**
9. Decision
10. Construction
11. Operation

Sizewell C submits updates to the Planning Inspectorate

By Sizewell C media team | January 13, 2021 | SZC news

Today, Sizewell C has submitted its proposed changes to the planning application for Suffolk's proposed new power station.

The changes were proposed following feedback from the two local authorities in the region as well as residents, MPs and other stakeholders and follows a 30-day public consultation, which started on 18 November 2020.

The Project consulted on a series of changes which include increasing rail and sea deliveries during construction to reduce the number of HGVs on local roads. **These new proposals will mean 150 less HGVs on local roads on the busiest day over the peak construction period.**

The Project also plans to reduce the use of AONB land on the Sizewell estate by working closely with Sizewell A, which is being decommissioned, and by using existing land within the Sizewell nuclear licensed area for critical buildings that need to be moved to allow construction to get underway.

In addition, a proposed new design to the crossing over the Sizewell Site of Special Scientific Interest will result in less of the SSSI being used for the project. Additional land for the creation of fen meadow to compensate for the loss of fen meadow land has also been identified.

Other steps, outside the Application, that have been taken to improve the benefits for Suffolk include:

- An increase from 1000 – 1500 apprenticeships.
- The launch of Young Sizewell C to provide links through education into training and jobs with Sizewell C and other regional companies.
- A clear pathway for students leaving education now to start work on Hinkley Point C and then return to the Sizewell C project in an advanced role – the first of those apprenticeships have been allocated to students in East Coast College and they are scheduled to start at HPC this year.
- Allocating our apprenticeship levy to enable local firms to take on apprentices in critical skills areas for the region.
- We intend to bring the growing Sizewell estate into the management of an independent Environment Trust which will focus on biodiversity and the stewardship of the natural habitat.

Speaking about the updated proposals, Carly Vince, Sizewell C Chief Planner said: “We continue to listen to local communities and other stakeholders and are grateful for their feedback on these changes which will keep more lorries off Suffolk’s roads.”

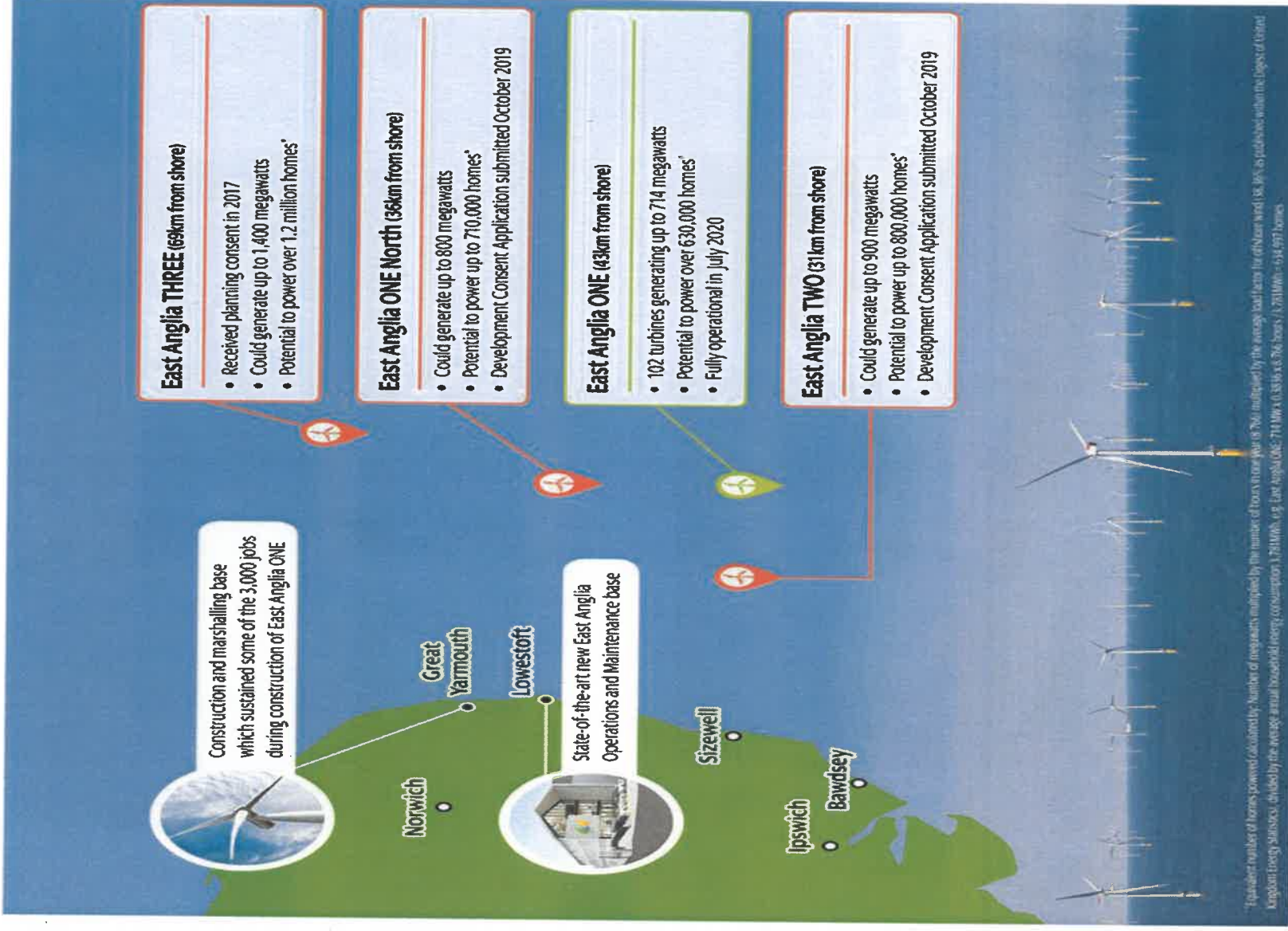
Sizewell C will deliver jobs, training and a boost in skills leading to sustainable well-paid careers, which is more vital than ever with the recovery from the pandemic crisis. Our work with education leaders will equip the next generation of workers with access to those jobs and others in the region. Our links with local charities working in Opportunity Areas, such as Inspire Suffolk and Access Community Trust, is already underway and will widen the access to fulfilling careers.

Next steps

The Planning Inspectorate will now consider these proposed changes in advance of the examination later this year. Town and parish councils can be assured that the Sizewell C Project is available to answer questions, attend council meetings and will continue to send regular planning briefings to parish clerks of all East Suffolk parishes and SALC.

ⁱ Information is from the Sizewell C website [Sizewell C submits updates to the Planning Inspectorate | EDF](https://www.sizewellc.com)
[edfenergy.com](https://www.edfenergy.com)

Item 9b - Offshore windfarms¹



October 2020 East Anglia TWO and ONE North Examination Commences



Following the close of the Preliminary Meetings on 6 October, the examination period commenced on 6 October 2020. The Examination period was extended in April 2021 by months to complete on 6 July 2021.

2023 Hub Offshore Construction Commences



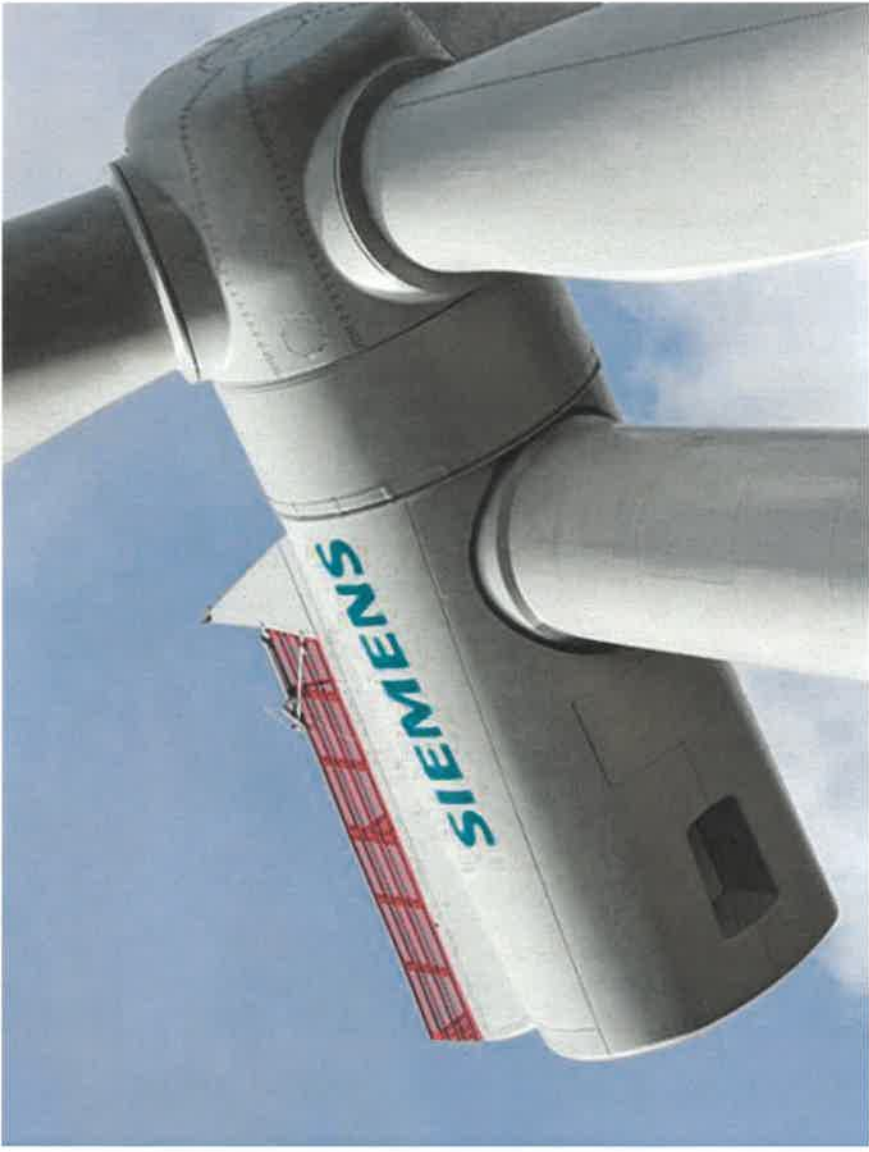
Offshore construction of East Anglia THREE, TWO and ONE North expected to commence in 2023.

2024 Hub Onshore Construction Commences



Onshore construction of East Anglia THREE, TWO and ONE North expected to commence in 2023.

2026 Full Operation Achieved



East Anglia Hub expected to be fully operational, powering over 2.7 million homes.

¹ Information is from the Scottish Power website - https://www.scottishpowerrenewables.com/pages/east_anglia_timeline.aspx