Waugh, Charlotte

From: housing.development
Sent: 16 January 2026 16:56
To: planning.technical; Waugh, Charlotte
Subject: RE: Planning Consultation - DC/25/1988/RM,Parcel A9, Land North Of Haverhill, Haverhill - CW

Good Afternoon Charlotte,

Strategic Housing would like to raise a holding objection to this application, as it currently does not meet the affordable housing requirements set out in the West Suffolk Local Plan or those secured through the S106 agreement for the development. The submitted scheme has been designed in line with guidance previously provided by Strategic Housing on the understanding that phases A9, A14 and A15 would be submitted as a single application. However, they have instead been submitted as two separate reserved matters applications, which must therefore be considered individually. As a result, the requirements of both the adopted Local Plan and the S106 agreement must be applied to each application separately.

The scheme currently proposes 42 affordable homes within a reserved matters phase of 95 dwellings, equating to a 44% affordable housing contribution. Under the third schedule of the S106 agreement, 23% of the first 850 dwellings for the overall scheme—of which these reserved matters still form part—must be delivered as affordable housing. This results in a requirement for 22 affordable dwellings for phase A9. These should then be split 80% affordable homes for rent and 20% shared ownership, resulting in 18 rented homes and 4 shared ownership homes, in accordance with the tenure mix defined in the S106 agreement.

We note that the applicant has included M4(3) properties within the scheme. We would encourage these to be provided on each phase of development and to comply with Policy SP17 of the adopted Local Plan, which requires up to 13% of affordable dwellings to be delivered as M4(3)(2)(b) wheelchair user standard. For this phase, this equates to 2.86 dwellings; therefore, Strategic Housing would expect to see 2 M4(3)(2)(b) dwellings provided on phase A9. These should provide level access throughout and fully accessible wetrooms.

As the mix currently proposed does not meet policy or S106 requirements, Strategic Housing requests that the following mix is provided instead:

18 Affordable Dwellings for Rent (proposed as Social Rent)

4 x 1-bed 2-person maisonette/flats (minimum internal floorspace 50m²) – Ground-floor units provided to M4(2) standard
2 x 1-bed 2-person maisonette/flats (minimum internal floorspace 50m²) – M4(3)(2)(b) wheelchair user standard, in accordance with Approved Document M.
2 x 2-bed 4-person maisonette/flats (minimum internal floorspace 70m²) – Ground-floor units provided to M4(2) standard.
4 x 2-bed 4-person houses (minimum internal floorspace 79m²) – M4(2).
4 x 3-bed 5-person houses (minimum internal floorspace 93m²) – M4(2).
2 x 4-bed 6-person houses (minimum internal floorspace 106m²) – M4(2).

4 Shared Ownership Dwellings

2 x 2-bed 4-person houses (minimum internal floorspace 79m²) – M4(2).
2 x 3-bed 5-person houses (minimum internal floorspace 93m²) – M4(2).

Total 22 Dwellings

Please note that to meet the affordable housing needs of the most residents possible, M4(2) properties should be provided with at a minimum a level access shower within the bathroom. Ground Floor M4(2) properties should contain wetrooms to meet a diverse

range of housing needs without need for adaptation later. They should also adhere to the building regulations as per approved document M.

West Suffolk prefers all affordable homes to be built to maximum occupancy standards. For 2-bed dwellings, this equates to a 4-person household, as previously discussed prior to submission. The Satterfield house type (maisonettes) does not currently meet this requirement and is presented as a 2-bed 3-person dwelling. We request that this is reviewed, as there is scope for the properties to meet the 2-bed 4-person requirement at a minimum of 70m² internal floor area, thereby meeting the affordable housing needs of West Suffolk. In all other respects, the application meets the Nationally Described Space Standards (NDSS).

There is also a significant issue relating to the clustering of affordable dwellings on the scheme. The maximum acceptable cluster size is 15 affordable dwellings. The current proposal includes a cluster of approximately 30 dwellings, which substantially exceeds this limit. This appears to be a consequence of the affordable housing provision exceeding the required contribution for the phase and should be resolvable through amendments to achieve the correct percentage.

Strategic Housing encourages developers to engage with Registered Providers (RPs) at the earliest opportunity to ensure affordable housing units can be taken on and managed effectively. There are several elements of the scheme for which we request confirmation that discussions have taken place with potential RP partners, due to possible management implications:

- Communal gardens for maisonettes, which may create maintenance and management challenges where private outdoor space is not provided for each dwelling.
- Private, non-adopted parking courts/driveways, which may result in increased service charges for residents and could pose affordability issues for RP tenants.
- Off plot/pedestal EV charging points, particularly in relation to service charging, maintenance responsibilities, and any additional costs that could impact affordability. Any such costs should be communicated to the RP at the earliest possible stage.
- Mixed-tenure blocks/terraces, which many RPs consider a management challenge and may be unwilling to take on. This applies to plots 93–95 and may require amendment if a provider cannot take these units.

Finally, we remind the applicant that once a Registered Provider has been secured, the RP must enter a nominations agreement with West Suffolk Council. This should be completed prior to the affordable units reaching completion to ensure there are no delays in advertising the properties.

Many Thanks,

Jenna

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