

Wealden District Council – Affordable Housing Delivery Local Plan – Revised Proposed Modifications
 Summary of responses

Consultee	Summary of response	WDC Response
Uckfield Town Council (Mr A. Serpis)	The Town Council supports the amendments	Noted.
Mrs. Jenny Wallis	Avoid any development in the AONB and ancient woodland. Infrastructure is a big problem. The level of development is too great.	Not relevant to the scope of the plan and the resulting policy.
Mr D Proudfoot	The proposals have been superseded by HMG's new Housing and Planning Bill 2015. The bill leads with Starter Homes that will be delivered by statutory duty not policy direction. It is likely that they will replace affordable housing as an option. This has not been addressed in the proposals. The proposals do not comply with the new Starter Homes direction and HMG's new Housing and Planning Bill 2015 which seeks to provide affordable housing to purchase rather than rent.	The Housing and Planning Bill is not yet legislation, and has no material weight.
	In view of HMG's recent statement that affordable housing should be available to buy and the demand is for one and two bed houses to purchase which is the governments new guideline we should have available sites that reflect this decision. It is feasible to build large blocks of one and two bed houses for sale at an economical and mortgageable price for someone on the average wages in this county.	The need for affordable housing is identified in the Council's evidence base. There remains to be a need for rented affordable housing.
Fletching Parish Council (Mrs C	The Parish Council supports the amendments.	Noted.

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Rumble)		
Heathfield and Waldron Parish Council (Mrs H. Simpson – Wells)	The Parish Council supports the amendments	Noted.
Mrs M. Riorden	<p>The issue around social and affordable rents as set out in Policy WD3 will prove unsound and unenforceable for the following reasons:</p> <ul style="list-style-type: none"> - The HCA step change away from funding HCA schemes for social housing; - The preferred tenure mix of Wealden’s preferred partners following the budget announcement in 2015 which require reductions in rents in the four years from 2016-17; - Brandon Lewis letter of 9th November to all LPA’s urging authorities across England to take a more flexible and pragmatic approach to requests for section 106 re negotiations for affordable housing especially with respect to tenure mix. 	<p>The viability studies submitted as part of the evidence base assume no grant funding.</p> <p>It is acknowledged that the Government have imposed a 1% rent cut on all social housing providers – 1% per year for the next 4 years. Limited funds for social housing providers may reduce the ability to pay for certain affordable housing products. The affordable Housing Delivery Local Plan is a long term plan that is flexible in terms tenure and proportion of affordable housing resulting from viability issues a result in changes in Government Policy. Therefore the Plan meets needs as required but is flexible to deal with changes in circumstances as cited. It also will be flexible if future Government’s change rent policies.</p> <p>The letter of 9th November 2015 encourages flexibility in the provision of affordable housing. The submission policy allows for flexibility and promotes the consideration of tenure before proportion of affordable housing. This is in line with the letter of the 9th November.</p>

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	<p>The HCA will only allow RPs to develop new homes and count these numbers in their programme if they are let at affordable rent (as opposed to social rent) whether these new homes are grant funded or not. This policy, in light of the Summer Budget, will cause too many conflicts for RPs and will result in fewer homes being delivered at sub market rents. Policy WD3 should be amended to delete any specific reference to social rented accommodation and remove the presumption of the policy towards a quantified percentage tenure mix, as RPs require flexibility in their approach.</p>	<p>There is a requirement in the NPPF for the tenure of affordable housing to be included in policy. This is required as it will affect viability and deliverability. There remains to be a need for social rented accommodation within Wealden District and this is reflected in the policy. However the policy is flexible in terms of tenure with regards to viability.</p>
	<p>Clarification of the government’s intention within The Housing and Planning Bill (with respect to the provision of a proportion of Starter Homes for first time buyers on all ‘reasonably sized sites’) is required in relation to any relevance to Policy WD3.</p>	<p>The Housing and Planning Bill is not yet legislation, and has no material weight.</p>
<p>Sigma Planning Services</p>	<p>Policy AFH1, by virtue of its prescriptive presumption towards a quantified mix of tenure between social rented, affordable rented and intermediate accommodation is contrary to;</p> <ul style="list-style-type: none"> - The HCA step change away from funding HCA schemes for social housing - The preferred tenure mix of Wealden’s preferred providers following the budget announcement of 2015 which require 	<p>The viability studies submitted as part of the evidence base assume no grant funding.</p> <p>It is acknowledged that the Government have imposed a 1% rent cut on all social housing providers – 1% per year for the next 4 years. Limited funds for social housing providers may reduce the ability to pay for certain affordable housing products. The affordable Housing Delivery</p>

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	<p>reductions in social rents in the four years from 2016-17</p> <ul style="list-style-type: none"> - Brandon Lewis letter of 9th November to all LPAs urging authorities across England to take a more flexible and pragmatic approach to requests for section 106 re negotiations for affordable housing especially with respect to tenure mix. 	<p>Local Plan is a long term plan that is flexible in terms tenure and proportion of affordable housing resulting from viability issues a result in changes in Government Policy. Therefore the Plan meets needs as required but is flexible to deal with changes in circumstances as cited. It also will be flexible if future Government’s change rent policies.</p> <p>The letter of 9th November 2015 encourages flexibility in the provision of affordable housing. The submission policy allows for flexibility and promotes the consideration of tenure before proportion of affordable housing. This is in line with the letter of the 9th November.</p>
	<p>The HCA has set a clear direction towards affordable rent (as opposed to social rent) comprising of the main type of new affordable housing supply. Policy AFH1 should seek to accommodate this provision to provide sufficient flexibility to accommodate central governments approach to the funding of affordable housing tenure. Policy AFH1 should be amended to delete any specific refernce to social rented accomodation and remove the presumption of the policy towards a quantified percentage tenure mix, as RPs require flexibility in their bidding process.</p>	<p>In accordance with the NPPF, the majority of need in the area has been identified as Social rented accommodation. However flexibility has been introduced in the policy concerning tenure.</p>
	<p>Clarification of the government’s intention within The Housing and Planning Bill (with respect to the provision of a proportion of Starter Homes for first</p>	<p>The Housing and Planning Bill is not yet legislation, and has no material weight.</p>

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	time buyers on all ‘reasonably sized sites’) is required in relation to any relevance to Policy WD3.	
Herstmonceux Parish Council (Mrs. J McInnes)	No comment	Noted.
Terrence O’Rourke (Mr N. Guildford)	The progression of the AHDLP is premature given the current position and uncertainty at a national level in respect of the Housing and Planning Bill 2015 and the DCLG appeal relating to affordable housing thresholds.	There is no requirement to put plan preparation on hold whilst matters are being considered by the Court of Appeal or whilst legislation is being progressed.
	It is acknowledges that a footnote (number 2) has been incorporated within proposed modification WD3. While this footnote would enable retrospective application of an alternative threshold for provision than that set out within the AHDLP it does not make any allowance for any other changes in government policy with respect to the provision of affordable housing.	Any changes to Government policy or legislation in the future will be a material consideration for all local plan policies across the country. The policy is considered flexible and meets the tests of soundness.
	Should it be determined that the AHDLP may progress as a minimum an additional footnote should be added to policy AFH1 to reflect that any future change in government policy in relation to the provision of affordable housing generally would take precedent over the policy.	Any changes to Government policy or legislation in the future will be a material consideration for all local plan policies across the country. The policy is considered flexible and meets the tests of soundness.
Submitted after deadline		
Natural England (Mr	No comments	Noted.

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J. Lister)		
Mrs C. Stirling- Reed	How is need assessed? How can we make sure that the needs of Hailsham residents do not supercede the needs of Herstmonceux residents	This is not a site specific policy. However, it allows for site specific policies when sites are allocated.
	Rural exceptions policy – this is a worrying feature of the new proposals. If developers want they can offer to build affordable housing on sites nomally forbidden and build ordinary housing too.	Rural exception policies are not included in the Affordable Housing Delivery Local Plan.
	The numbers for people to actually buy their affordable homes instead of renting them are too small.	This is not a relevant comment to this policy.
Mr A. Yearsley	The Council’s evidence base of the 2009 Housing Needs Survey is out of date. It is clear from the NPPF that the objective assessment of housing needs should take full account of up to date and relevant evidence about the economic and social characteristics and prospects of an area.	Evidence of need has been provided as part of the Affordable Housing Delivery Local Plan. A final Draft Strategic Housing Market Area Assessment has been published (October 2015). This has not been submitted as part of this examination, owing to its publication date.
	There is no evidence basis in the justification for the revisions to the policy that suggest a need or demand for reducing the affordable housing threshold from a net increase of 11 units to 5 units. The policy also fails to address why the 5 unit threshold is a blanket requirement for the entire borough. The policy does not take into account the differences in need and demand for development in urban areas as oposed to areas in the AONB. If there is a justification for this it needs to be set out clearly within the proposed revisions to the policy.	Justification for a 5 unit threshold is provided within the evidence base.

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	<p>In light of the government’s recent announcement relating to Starter Homes the stated tenure mix for social rented, affordable rented and shared equity is no longer in accordance with national planning policy guidance, which would mean that this policy would effectively be out of date on adoption.</p>	<p>The National Planning Policy Framework and National Planning Practice Guidance has not changed in terms of tenure of affordable housing.</p>
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