Affordable Housing Delivery Local Plan Issues and Options Representation Form (Regulation 18)

Wealden District Council

Please read the accompanying **'Guidance Notes for Respondents - Affordable Housing Delivery Local Plan Issues and Options'** before completing this form.

Where possible, the Council would prefer that you submit your response using our online 'Objective' consultation system at http://wealden.objective.co.uk/portal/ or by following the links from the Council's website http://www.wealden.gov.uk/.

The period for representations runs from **Monday 22nd September 2014 until 5pm on Monday 3rd November 2014. Please email completed forms to ldf@wealden.gov.uk or alternatively send by post to;**

Planning Policy, Wealden District Council, Vicarage Lane, Hailsham, BN27 2AX

This form has two parts:

- Part A: Personal details
- Part B: Your representation(s)

If you need further information or assistance, please contact the Planning Policy Team by e-mail at ldf@wealden.gov.uk or by telephone on 01892 602007.

Part A - Personal Details

	Personal Details	Agent Details (if applicable)
Title	Mr	Mr
First Name	Hugh	David
Last Name	Reilly	Bedford
Job Title (where relevant)		Associate Planner
Organisation (where relevant)		Kember Loudon Williams LLP
Address	C/o Agent	Ridgers Barn Bunny Lane, Tunbridge Wells
Post Code		TN3 9HA
Telephone Number		01892 750018
Email Address		david.bedford@klw.co.uk

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Part B – Your representation(s)

Name/ Organisation/ Agent:

Mr H Reilly

Q1. Do you have any comments regarding the use of a 5 dwelling threshold, in relation to the provision of affordable housing?

We support the provision of a 5 unit threshold.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q2. Do you have any comments regarding the use of a threshold of 0.2 hectares, in relation to the provision of affordable housing?

Whilst we understand the concept of a site size threshold we do not consider this to be a sound method for attracting affordable housing. For example sites that require a significant level of open space to be provided, or an ecological buffer zone, could exceed 0.2ha without delivering a quantum of housing that should reasonably attract AH provision.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q3. Do you have any comments regarding the general requirement of 35% affordable housing?

We believe the Council should introduce a 'sliding scale' approach to the provision of affordable housing, as per the approach of Sevenoaks District Council. We suggest along the lines of as follows:
5-10 units - contribution towards off site provision (equivalent of 10% service land value)
10 - 20 units - 25% on site provision;
20 + units - 35% on site provision.

This will ensure appropriate levels of AH are secured in suitable locations without threatening overall viability and desirability of a scheme.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

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Part B – Your representation(s)

Q4. Do you have any comments regarding the general tenure requirement of 80% social rent and 20% intermediate accommodation, and the use of affordable rent products?

We have no objection in principle, subject to a degree of flexibility being written into any future policy to allow a variation in tenure if local/site circumstances dictate it to be appropriate.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q5. Do you have any comments regarding the tenure requirement of 40% social rent, 40% affordable rent and 20% intermediate accommodation for strategic sites?

As per question 4.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q6. Do you have any comments regarding the use of affordable rented products in relation to larger sites?

As per question 4.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

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Part B – Your representation(s)

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Q7. Do you have any other comments you wish to make?

As set out within answers to earlier questions, we request that any future policy contains sufficient flexibility to ensure that the affordable housing requirements are not overly onerous, nor would they threaten the viability and desirability for landowners to bring forward new housing - particularly in areas of high housing need, such as Heathfield, were historic development rates are very low. Due to the inflexibility of the CIL charging system, it is also important that affordable housing can be looked at with a degree of scope for negotiation when overall viability is threatened.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Q8. Do you have any comments as to what this Local Plan should contain?

We wish to see a positive approach to planning for the growth of Heathfield, which to date has been delayed through both the Core Strategy and the Strategic Sites Allocations.

Continue on a separate sheet if necessary. Mark any additional pages with your name or organisation

Data Protection Act 1998 and Freedom of Information Act 2000
Representations cannot be treated in confidence and copies of all representations will be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, emails or private addresses. By submitting your views on the document you confirm that you agree to this and accept responsibility for your comments.

Signature	[redacted]	Date	29/10/2014

If you, or somebody you know, would like the information contained in this document in large print, Braille, tape/ CD or in another language please contact Wealden District Council on 01323 443322 or info@wealden.gov.uk.

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