Comment

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO16
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Question 1

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

Rydon Homes hold the view that the threshold should not be lowered from the 5 dwellings threshold, which is currently within the provisions of the adopted Core Strategy Policy WCS8. The outcomes of the 2010 Housing Viability Assessment (Three Dragons) commissioned by Wealden District Council, concluded in paragraph 7.3, that there was nothing to suggest that sites towards the upper or lower end of the range of site sizes tested (namely 5 to 9 dwellings), would produce a higher or lower residual value, it will depend on the mix and type of dwelling involved. In addition, Rydon Homes would advocate that abnormal costs vary between sites and can impinge significantly upon the viability of delivering affordable housing, either through on site provision or through contributions. The 2010 Three Dragons Viability Assessment also referred specially to viability on small sites being very sensitive to relationship between existing/alternative use values and the viability of delivering affordable housing. Historic housing delivery on small sites within the development boundary of either the District?s towns or rural settlements, have frequently resulted from the redevelopment (loss) of a residential property with a net gain in the number of dwelling units. The reduction in the 5 dwelling threshold will further reduce

the residual value of the site and relative to the existing use value, provide the potential to discourage landowners to progress small sites and in so doing, reduce the delivery affordable housing across the District. The consultation document refers at paragraph 3.1 that ?from the ?Community Infrastructure Level Viability Study it is proven that a five dwelling threshold is viable across the District?. Reference to this overview cannot be found in the August 2014 CIL viability assessment. In the absence of an updated housing viability assessment which assesses the viability of a different threshold scenario across the District, Rydon Homes consider that the lowering of the existing 5 dwelling threshold would be unjustified, would increase the propensity to render developments on small sites unviable and in so doing, reduce the potential to provide affordable housing throughout the District.

Comment

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO17
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Question 2

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

Rydon Homes take the view that the threshold should not be lowered from the existing threshold of 0.2 hectares, which is currently within the provisions of the adopted Core Strategy Policy WCS8. Calculated at a density of 30 dwellings per hectare, a gross site area of 0.2 hectares would equate to 6 dwellings. The 2010 Three Dragons Housing Viability Assessment, commissioned by Wealden District Council referred specially to viability being very sensitive on small sites, to the relationship between existing/alternative use values and the viability of delivery affordable housing (on site or through contributions). In the absence of an updated housing viability assessment which assesses a different site threshold size across the District, Rydon Homes consider that the lowering of the existing site size threshold would be unjustified, would increase the propensity to render scheme unviable and thereby could reduce the amount of affordable housing provided through the District. Historic housing delivery on small sites within the development boundary within either the District?s towns or rural settlements, have frequently resulted from the redevelopment (loss) of a residential property with a net gain in the number of dwelling units. The reduction in the 0.2 hectare threshold will further reduce

the residual value of the site and relative to the existing use value, provide the potential to discourage landowners to progress small sites and in so doing, deliver affordable housing across the District.

Comment

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO19
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Question 1

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

Rydon Homes hold the view that the threshold should not be lowered from the 5 dwellings threshold, which is currently within the provisions of the adopted Core Strategy Policy WCS8. The outcomes of the 2010 Housing Viability Assessment (Three Dragons) commissioned by Wealden District Council, concluded in paragraph 7.3, that there was nothing to suggest that sites towards the upper or lower end of the range of site sizes tested (namely 5 to 9 dwellings), would produce a higher or lower residual value, it will depend on the mix and type of dwelling involved. In addition, Rydon Homes would advocate that abnormal costs vary between sites and can impinge significantly upon the viability of delivering affordable housing, either through on site provision or through contributions. The 2010 Three Dragons Viability Assessment also referred specially to viability on small sites being very sensitive to relationship between existing/alternative use values and the viability of delivering affordable housing. Historic housing delivery on small sites within the development boundary of either the District's towns or rural settlements, have frequently resulted from the redevelopment (loss) of a residential property with a net gain in the number of dwelling units. The reduction in the 5 dwelling threshold will further reduce

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO20
Response Date	23/10/14 10:42
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Question 2

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

Rydon Homes take the view that the threshold should not be lowered from the existing threshold of 0.2 hectares, which is currently within the provisions of the adopted Core Strategy Policy WCS8. Calculated at a density of 30 dwellings per hectare, a gross site area of 0.2 hectares would equate to 6 dwellings. The 2010 Three Dragons Housing Viability Assessment, commissioned by Wealden District Council referred specially to viability being very sensitive on small sites, to the relationship between existing/alternative use values and the viability of delivery affordable housing (on site or through contributions). In the absence of an updated housing viability assessment which assesses a different site threshold size across the District, Rydon Homes consider that the lowering of the existing site size threshold would be unjustified, would increase the propensity to render scheme unviable and thereby could reduce the amount of affordable housing provided through the District. Historic housing delivery on small sites within the development boundary within either the District?s towns or rural settlements, have frequently resulted from the redevelopment (loss) of a residential property with a net gain in the number of dwelling units. The reduction in the 0.2 hectare threshold will further reduce

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
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Question 3

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

In the absence of up to date evidence in the respect of the publication of the awaited SHMA review and an updated Housing Viability Assessment to the 2010 study, it is difficult to envisage how the emerging Affordable Housing Delivery Local Plan could propose a policy incorporating a general requirement of a figure different to the 35% affordable housing, which has already been found sound under examination. Notwithstanding this, Rydon Homes consider that the general requirement of 35% affordable housing should not be increased further. An increase in the general requirement of affordable housing would not be realistic in all market areas across the District, which varies widely across the District. In real terms, viability will vary widely across individual schemes over time, in addition to across different market areas. The policy requirement should not set a target which is too ambitious in different and less buoyant economic conditions and should have regard to the NPPF, which indicates that obligations and policy burdens should be weighed against viability. Regard should also be given to the increased development costs and reduced residual values from developing a site and the potential t opportunity for providing affordable housing, since the published Housing Viability Study in 2010 and the adoption of the Core Strategy in 2012. Development costs are anticipated to significantly increase

due to (amongst other reasons) the emerging tariff based Community Infrastructure Levy and the from the anticipated requirement within Wealden District for affordable housing to be constructed to a higher specification to meet both lifetime homes and Code Level 4 (energy efficiency) standards. It is noted the policies of Submission Strategic Sites Local Plan specify these provisions within the respective policies, indicating the commitment of the Council in respect of the design specification of affordable homes.

Comment

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Comment by	Rydon Homes ( )
Comment ID	AHDIO22
Response Date	23/10/14 10:43
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Question 4	

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?

Rydon Homes consider that the existing adopted Core Strategy Policy WCS8 is out of date in respect of this policy provision, given that central government have carried out a step change away from funding HCA schemes for Social Rented Affordable Housing. The Homes and Communities Agency have moved towards favouring the funding of Affordable Rent Affordable Housing and not Social Rented Affordable Housing. Registered Social Landlords require flexibility in their bidding process and the policy should be amended appropriately.

Comment

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO23
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Question 6

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

The Homes and Communities Agency have to date set a clear direction towards affordable rent (as opposed to social rent) comprising of the main type of new affordable housing supply. Any emerging affordable housing policy should seek to accommodate this provision but also provide sufficient flexibility to accommodate a change in central government's approach to the funding of affordable housing tenure type within the Plan Period.

Comment

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO24
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Question 7

Do you have any other comments you wish to make?

No comments

Comment

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Event Name	Affordable Housing Delivery Local Plan - Issues and Options
Comment by	Rydon Homes ( )
Comment ID	AHDIO26
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Question 5

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

Rydon Homes note that the September 2014 Community Infrastructure Delivery Plan assumed the provision of the above precise tenure mix and type across the Strategic Sites, following on from the testing of an alternative policy by Peter Brett Associates (August 2014 Housing Viability Report). Rydon Homes consider that the Affordable Housing Delivery Local Plan policy should not specify a specific split between social and affordable rent but rather enable flexibility and choice for Registered Social Landlords. There is concern over any specific reference to ?social rent? which could potential be out of date in the foreseeable future.