Wealden District Affordable Housing Delivery Local Plan

Regulation 22 (1)(c) statement

Part 2 of 2

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Introduction

1. This statement has been prepared in accordance with Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations'). It forms part of the submission documentation for the Affordable Housing Delivery Local Plan ('AHDLP').

2. The purpose of the statement is to provide a summary of the Council's consultation process and outcomes for the production of the Affordable Housing Delivery Local Plan. The Regulations set out that this statement must cover:

(i) Which bodies and persons were invited to make representations under Regulation 18
(ii) How those bodies and persons were invited to make representations under Regulation 18
(iii) A summary of the main issues raised by the representations made to Regulation 18
(iv) How any representations made pursuant to Regulation 18 have been taken into account
(v) If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
(vi) If no representations were made in Regulation 20, that no such representations were made.

Background

3. In Wealden the adopted Core Strategy is the overarching planning policy document for the Wealden District area setting out the vision for the future development of the area over a period to 2027. The Affordable Housing Delivery Local Plan seeks to review the Core Strategy Local Plan Policy WCS8 concerning Affordable Housing.

Stage	**Timescale**	**Approx. number of respondents**
Regulation 18 – first stage of consultation on potential development sites – Issues and Options	22nd October 2014 – 3rd November 2014	22 respondents
Regulation 19 - Proposed Submission Local Plan	1st December 2014 – 12th January 2015	11 respondents
Regulation 19 – Revised Proposed Submission consultation – Revised Proposed Submission Local Plan	2nd February 2015 – 16th March 2015	15 respondents

4. This is the second part to the Regulation 22 statement. Part 1 of 2 outlines the consultation details for the Regulation 18 and first stage of the Regulation 19 consultations. This part (Part 2 of 2) sets out the summary of the main issues raised in the second stage of Regulation 19 consultation on the Revised Proposed Submission AHDLP.

Regulation 19 – Revised Proposed Submission Consultation

5. A third stage of consultation on the AHDLP took place between 2nd February 2015 and 16th March 2015. On Friday 28th November 2014 the National Planning Policy Framework (NPPF) and Planning Guidance was updated in relation to planning obligations for the provision of affordable housing. These changes to national policy and guidance have a material impact upon the policy contained within the Proposed Submission Affordable Housing Delivery Local Plan. The Proposed Submission Affordable Housing Delivery Local Plan was amended to take into account these changes and reported to the LDF Sub Committee on 15th January 2015 and Full Council on 28th January 2015.

6. The Sustainability Appraisal was updated in light of the changes in the policy proposed arising from the changes to National Guidance.

7. The period of consultation was authorised by Full Council on 28th January 2015. We invited representations from all persons and organisations registered on the Planning Policy database which includes all statutory consultees and individuals and organisations who commented on the earlier stages of consultation.

8. We received responses from 15 respondents, 1 via the online consultation software, 7 via email and 7 by letter.

Consultation Responses

9. The responses are summarised below and grouped together under common themes:

Affordable Housing Thresholds

- The proposed plan needs to state more clearly and with justification, which legislation has been used to define the 'rural areas' and the 'Affordable Housing Policy Areas'.
- The manner in which the Plan has been drawn up presents a compromised interpretation of the Ministerial Statement.
- An appropriate criterion for assessing where boundaries should be drawn would be to use the level of affordable housing need in different areas of the District.
- Current proposed Policy AFH1 areas do not reflect the background viability evidence used for the Core Strategy which showed the central

and northern parts of the District could support higher levels of affordable housing than the south.

- Threshold areas need to reflect a consistent definition of 'very rural areas' as stated in the Ministerial Statement.
- Plan is inconsistent in defining 'very rural areas'. In some settlements portions of clearly urban areas have been allocated outside of the higher threshold whereas in others undeveloped land adjacent to urban areas has been included in the higher threshold.
- Consideration needs to be given to the relationship between proposed policy areas and the general pattern of developed proposed in the Core Strategy.
- A number of Policy AFH1 boundaries leave Core Strategy allocations outside of the boundary.
- Approach taken by Council for affordable housing requirements is inconsistent with the requirements of the NPPF and NPPG.
- Affordable housing requirement must be based on adequate, up-to-date and robust evidence.

Delivery

- Commuted payments method needs to provide stronger assurances that payments will be spent on rural affordable housing provision.
- The Council should consider the benefits of allowing off site affordable housing provision or through commuted sums on all future residential proposals.

Affordable housing tenure

- Affordable housing on all sites should be split 40% affordable rent; 40% social rent and 20% intermediate, not a separated tenure mix as proposed in Policy AFH1.
- The Council should identify the scale and mix of housing and range of tenures that local population need over the plan period in line with para 159 of the NPPF.
- The Council should not presume its tenure mix based on evidence which is considered to be inconsistent with national policy and guidance.

Other

- Threshold areas and the lack of specific detail as to where commuted sums will be spent do not reflect the aims of the Ministerial Statement to reduce costs for small scale house-builders.
- Specific criteria is needed to justify definition of rural areas and Affordable Housing Policy Areas.
- Policy needs to comply with the NPPG and the thresholds contained therein as well as the NPPF.

10. There were several responses specific to the Affordable Housing Policy Area proposed in Heathfield:

- Any housing development in New Pond Hill could exacerbate traffic problems which are already present such as congestion, specifically on the A267 and also the junction of the A267 and A265.
- Existing traffic issues will be exacerbated.
- Traffic situation around A267/New Pond Hill and Little London Road is poor at present and will be made worse.
- Proposed area is not near any rail links. Occupiers will travel to and from area by car.
- This would be the first step towards urbanising this rural area.
- The area is adjacent to the AONB and outside of the development boundary. Provides a buffer to the AONB.
- The area is a ridge top site and would impact on the AONB.
- Development in this area is likely to affect the strategic gap between Heathfield and Cross-in-Hand.
- Current infrastructure could not cope with further development.
- North end of Little London Road is already a 'rat run'. This will be made worse.
- Schools and other services including doctor's surgery are operating at capacity.
- Underwater streams and springs may be contaminated from development in this area.
- Potential for groundwater to be affected by development with a knock on affect for wildlife and biodiversity.
- The lack of rural buses and the edge of settlement location means the area is unsustainable as a development location.
- This area has been considered for housing in the past and been found to be unsuitable – what's changed?
- Agree more affordable housing is needed in Heathfield but the area defined in the Affordable Housing Delivery Local Plan is not the right location.
- Identified area is completely unsuitable.
- Increased road traffic as a result of development will mean dangerous walking conditions, increased road erosion and increased travel times.
- Infrastructure is not suitable to support development in the proposed Affordable Housing Policy Area.
- Further development here would require substantial highways alterations and improvements.

Sustainability Appraisal

- SA fails to analyse a suite of reasonable alternatives in respect of whether the Council is capable of delivering affordable housing through an increase in total number of houses required.
- Need to identify the Objectively Assessed Housing Need.