Matter 12 /WDC

Wealden District (Incorporating part of the South Downs National Park)

Core Strategy Hearing

Matter 12: Affordable Housing - Statement by WDC/ SDNPA

December 2011

Wealden District Council and South Downs National Park Authority
Response to the Inspector's Matters, Issues and Questions
(Issued 3 November 2011)

Matter 12: Affordable Housing (WCS8, WCS9)

A) Have the requirements in terms of threshold and percentage for affordable housing been justified by the evidence base?

1.1 The South East Plan (policy H3) has an overall regional target of the provision of 35% affordable homes (25% social rented and 10% intermediate), with Policy SCT6 providing, as a general guideline, 40% of new housing to be affordable in the Sussex Coast Sub Region.

1.2 The evidence base underpinning the threshold and percentage for affordable housing contained within the Core Strategy include the Wealden Housing Market Assessment (references I4 and I5), the Wealden Affordable Housing Viability Assessment (references I6 and I7) and the Wealden Housing Needs Assessment - January 2010 (references I8 and I9). Chapter 9 of Background Paper 2: Managing the Delivery of Housing (reference A18) provides a summary of the evidence and the reasoning behind the threshold and percentage of affordable housing.

1.3 The evidence base is clear that the provision of new affordable homes is required as a package of measures to meet affordable housing need within Wealden District. This evidence is contained within the Response to the Summary of Inspector's Concerns and Letter dated 31st October 2011 (reference Y10, paragraphs 1.27 - 1.28 and Appendix B). Chapter 9 of Background Paper 2: Managing the Delivery of Housing (reference A18) clarifies the basis of the policy for 35% affordable housing, based on the overall viability of the District, consultation responses as well as Sustainability Appraisal (reference A2, paragraph 97 to 100 and Table 8.10). The reasoning behind the threshold in relation to the viability evidence base is also provided.

1.4 It is considered that based on need and viability that the requirements of the overall percentage and threshold of affordable housing has been justified by the evidence base.

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B) Is the possibility of different affordable housing targets on some allocated sites justified by the evidence base?

2.1 The Wealden Affordable Housing Viability Assessment (references I6 and I7) is clear that different areas within Wealden can contribute to different proportions of affordable housing, and this is summarised in paragraph 9.11 of Background Paper 2: Managing the Delivery of Housing (reference A18). The provision will vary with a variety of on-site costs and viability as well as local circumstances, that need to be taken into account as part of the Sustainability Appraisal process, as well as consideration of the need to create mixed communities (Planning Policy Statement 3: paragraph 29). It is therefore clear that the consideration of different affordable housing targets on some allocated sites, which will in themselves be subject to consultation as well as assessment, is considered an appropriate approach and fully justified by the evidence.

C) Has the effect of affordable housing provision on the overall viability of development been appropriately considered?

3.1 The Wealden Affordable Housing Viability Assessment (references I6 and I7) has appropriately considered the overall viability of development in the context of a strategic policy document, with geographical differences provided. The lowest amount of affordable housing over the long term taking into account the down turn in the economy, without grant, has been used for the policy to ensure viability. Therefore it is considered that the effect of affordable housing provision on the overall viability of development has been appropriately considered.

3.2 In addition, further work regarding Strategic Sites Development Plan Document will finesse this work further. The proposed Community Infrastructure Levy Charging Schedule will also take into account affordable housing provision, and spread the infrastructure costs of strategic infrastructure over a greater geographical area, allowing affordable housing to be provided.

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D) Has the presumption that 80% of the total number of affordable homes should be social rented been justified by the evidence base?

4.1 The tenure mix for affordable housing, based on the Council's 2010 Housing Needs Assessment and the subsequent viability testing provides that a 80% of social rented accommodated is required and is viable. The summary of the conclusions are provided at paragraphs 9.1 and 9.2 of Background Paper 2: Managing the Delivery of Housing (reference A18). On the basis of need and viability it is considered that 80% of the total number of affordable homes should be social rented has been justified by the evidence base.

E) Does the change to the definition of affordable housing in Annex B of PPS3 to include affordable rented housing have any implications for the Core Strategy?

5.1 This matter has been addressed as part of the submission dated 2nd December 2011.