

Friends of Lewes comments in response to the South Downs National Park Authority's consultation on their draft Affordable Housing Supplementary Planning Document (SPD), November 2019

Friends of Lewes welcome the publication of further guidance via Supplementary Planning Documents (SPDs) that support the implementation of policies in the adopted South Downs Local Plan.

The Society is pleased to comment on the consultation draft of the Affordable Housing Supplementary Planning Document (SPD) to support Local Plan policy SD28 (Affordable Homes) and objective 8, which aims to ensure that consistent information is provided in support of planning applications.

The Society supports the implementation of Policy PL1 A (part 3) of the Lewes Neighbourhood Development Plan via the SPD, which requires development to maximise the amount of Lewes Low Cost Housing to meet local housing need, unless proven to be undeliverable. This is the maximum cost affordable on the average Lewes salary whether for sale or rent.

Friends of Lewes has no objection in principle to the SDNPA accepting financial contributions in lieu of affordable housing on sites with a gross capacity of 3 homes, or exceptionally on proposals of 4 to 10 dwellings where evidence demonstrates that on-site provision of affordable housing is not feasible. However the Society strongly objects to the provisions of paragraph 2.28 in which funds raised from such financial contributions will be used to increase the overall number of affordable homes within the South Downs National Park or to cross-subsidise delivery of rural exception sites.

Friends of Lewes believe that financial contributions in lieu of affordable housing provision should be ring fenced to provide affordable housing within the Local Neighbourhood Development Plan area. The Society considers it inequitable that financial contributions raised from development within Lewes town will not be used for the provision of affordable housing in the town.

It therefore considers that in order to meet the Lewes community's housing need paragraph 2.48 should be amended to read:

*2.48 In Lewes town, the LLCH model will apply. Rented affordable dwellings should be provided at a rent level based on income rather than market rents, to reflect the aims of the LLCH policy.¹⁰ Intermediate housing for sale should be capped at a level which is 5 times the average Lewes household income. **Financial contributions in lieu of affordable housing will be ring fenced for the provision of affordable housing within the Lewes Neighbourhood Development Plan area.***

Chris Kneale
Friends of Lewes
November 2019