

**SOUTH HAMS LOCAL DEVELOPMENT FRAMEWORK**

**Public Examination of the Affordable Housing Development Plan Document**

**STATEMENT OF SOUTH HAMS DISTRICT COUNCIL**

**Session 4 – Mix, Size, Type and Tenure – Tests 4 & 7 – Policy AH4**

**1. Would the tenure split meet housing needs and be consistent with the Regional Housing Strategy, the Housing Needs Market Assessment and Government objectives for creating mixed and balanced communities?**

1.1 The Regional Housing Strategy (RHS) sets headline strategic aims, the first of which is “Improving the balance of housing markets”. The aim is further detailed as follows: “To develop housing markets with a range of tenures, which improve the balance between supply and demand, and offer everyone the opportunity to access a home at a price they can afford.”

1.2 In order to achieve this aim, recommendations are made by the Regional Housing Body (RHB) in respect of the balance of tenures to be supported through regional investment from the National Affordable Housing Programme (NAHP). The most recent recommendation of the RHB has been a 70% rent, 30% Homebuy allocation. This represents no change from the previous recommendation for the funding period 2006-08.

1.3 Whilst the HMNA did not include a specific recommendation in respect of tenure split, it highlighted a higher level of need for social rent than for intermediate housing and suggested that the whole of the affordable housing allocation could be justified as social rented. The report also acknowledges however that this would not be practical or desirable and would certainly not contribute toward mixed, balanced and sustainable communities. The report also acknowledges the extreme difficulties associated with accessing home ownership in the district and suggests that a significant proportion of homes should be provided through intermediate tenures.

1.4 In the interest of meeting the government’s sustainable communities agenda and balancing the RHB’s requirements with a local assessment of housing need, a strategic tenure split of 60% rent and 40% intermediate housing is deemed appropriate. This is a view supported by David Couttie Associates (see Annex 1 to Council’s statement for Session 2).

1.5 The DPD Monitoring Framework already includes a break-down of the number of affordable units by Plymouth Urban Fringe, Area and Local

Centres and Rural Areas, as suggested by GOSW (GOSW response to Submission Stage DPD Rep1). The Council does not consider that the additional breakdown by tenure suggested is necessary, but would be prepared to include it if it was felt to be a necessary and useful addition.

- 1.6 The Council believes that the evidence base is appropriately reflected in the DPD and does not accept GOSW's view that greater detail should be given in the DPD itself. GOSW state (Submission stage rep no 1) that it is unclear what evidence informs what policy. However, the evidence and DPD policies need to be seen holistically. The inter-relationships between evidence and policy are numerous – evidence supports policies across the board.
- 1.7 Section 5 of the DPD (Housing Need and Affordability) explains the different evidence sources that have informed its preparation, with specific references to the HMNA (CD 175) and the additional viability work (CD173) which is explained more fully in Section 8 (Viability Issues). The Council does not consider that full reiteration of the evidence is appropriate within the DPD. For a fuller understanding of the detailed conclusions of the HMNA (CD 175), the Supply / Demand Analysis (CD 174) and the Affordable Housing Viability Study (CD173) reference should be made directly to the original source document.
- 1.8 Where specific correlation between evidence and policy would be helpful the DPD expresses it. For example, and in specific response to GOSW's concern in this respect, para 7.12 of the DPD explains that the strategic tenure split (60% social rent / 40% intermediate) is derived from the HMNA (CD175). A letter from David Couttie Associates further supports this position and is supplied as Annex 1 to the Council's statement for Session 2.
- 1.9 The Council does not share GOSW's concern that it is not sufficiently clear in the DPD how the evidence plays out spatially. Reference to the evidence, particularly the Adams Integra (AI) viability report (CD173), demonstrates the spatial dimension of the evidence, the recommendations made by AI and the policies of the DPD.
- 1.10 In the Council's view, the DPD provides sufficient clarity about the evidence which informs and supports it. However, if it were felt necessary to set out the evidence in more detail within the DPD itself the Council would be prepared to do so.

**2. Should there be greater spatial interpretation of tenure split and should local circumstances be cited?**

- 2.1 The tenure split referred to within the policy is a broad district wide target based on data from the HMNA. It is recognised that the need for different tenure types will vary geographically. The proposed tenure split is a district wide target and that provision on site will have regard

to local circumstances. In practice this may mean that higher or lower levels of a particular tenure type will be sought dependent on local circumstances.

**3. Should recognition be given to schemes where it may not be possible to integrate market housing with affordable housing?**

3.1 Government guidance in PPS3 (CD22) is clear that locations that are acceptable for housing should be considered acceptable for affordable housing. It would therefore run contrary to higher level policy, objectives and advice to make policy provision in the DPD for schemes not to provide such integration. However, the SPD sets out guidance on the circumstances where such an approach may be accepted.

3.2 We do not agree with McCarthy and Stone's point (Submission Stage Rep 1265) that it is always impossible to provide affordable and open-market sheltered / supported housing units. Correspondence from GOSE (attached as PDF file at Annex 1) strongly rebuts their view. The policy framework already allows for such considerations to be made, however this is expected to be only in exceptional circumstances.