

SOUTH HAMS LOCAL DEVELOPMENT FRAMEWORK

Public Examination of the Affordable Housing Development Plan Document

STATEMENT OF SOUTH HAMS DISTRICT COUNCIL

Session 6 – Implementation and Monitoring – Tests 8 & 9

1. What tools / means are intended to measure development viability?

1.1 The DPD policy targets are based on a comprehensive district wide viability assessment. It is however recognised that site specifics will need to be taken into account when considering viability on a site by site basis. Where viability issues are raised, the Council will use a traditional residual land value (RLV) approach to test viability. This approach is detailed further in the SPD.

1.2 A range of RLV models are available including the Grimley Model which was developed by GVA Grimley as a toolkit specifically for the Housing Corporation. It is understood that the Grimley model is widely accepted by the development industry and is available free of charge and therefore accessible to all applicants.

2. Are adequate tools / resources available to ensure the delivery of affordable housing, will RSLs be involved in monitoring supply / tenure mix / neighbourhood priorities?

2.1 When viewed in the context of the scale of need, the blunt answer to whether adequate tools / resources are available to ensure the delivery of affordable housing must be negative. Indeed, it is well beyond the ability (or remit) of the Council to wholly redress the situation. However, the DPD aims to establish the basis for meaningful progress to be made, and the Council has worked very hard towards that end for several years.

2.2 The Council's top corporate priority is the delivery of affordable homes and in recent years Members have dedicated additional resources towards making progress. A dedicated affordable housing team is in post to help enable schemes to happen. They are available to assist development control with pre-application and applications advice on housing schemes. Their expertise is in housing policy and enabling, surveying and land management, including land valuation and development processes, forward planning and development control.

2.3 This dedicated team resource alongside other officers offers adequate capacity to help promote the delivery of affordable housing and liaise with RSL partners as appropriate. However, it is clear that the Council

cannot control market conditions and cannot therefore “ensure” delivery of affordable housing at root. Rather, it has sought to establish a clear policy framework and dedicated resources to support and accelerate delivery.

2.4 The LDF monitoring framework establishes an open and transparent basis for monitoring to be carried out. Progress is regularly reported both within the Council and in a wider context with partners (for example, within the HMA, with RSLs and at the South Hams Strategic Partnership). This provides a basis for review and corrective action if justified.

3. Is there an inconsistency between the monitoring targets for windfall sites and AH3?

3.1 There is an error in the monitoring target. A mistake in the document was noted after it had been printed, as demonstrated at paragraph 7.8 where the error was amended using a pre-printed label. However the corresponding targets in the monitoring section have not been amended. This is an error for which the Council apologises. The targets for windfall sites should read the same as Policy AH3 paragraph 7.8 as amended.

3.2 The Council has suggested an appropriate correction for this error in its suggested Statement of Common Ground.

4. Are the policies reasonably flexible to deal with changing circumstances / what contingency exists in the event of inadequate delivery of affordable housing?

4.1 The Council considers that the policies are both flexible enough to respond to changing circumstances and robust enough to meaningfully address the seriousness of the need for affordable housing in the district. Indeed, the current changes and uncertainty in the market led the Council to commission a recent viability update from Adams Integra (CD200) and that update supports the Council's view.

4.2 Plan, Monitor, Manage is integral to the LDF system. The DPD and the higher level provisions of Core Strategy Policy CS6 provide flexibility to respond to local changes of circumstance, such as levels of need, viability and the economics of provision. Macro-scale changes – say, in the market, or the state of the economy – will be monitored through the development plan system at national and regional level.

4.3 The Annual Monitoring Report (AMR) will highlight whether policy objectives are being achieved, including the delivery of affordable housing. For example, Indicator 4 considers the supply of affordable housing, and the AMR for 2005-06 shows that 133 new units of affordable housing were completed in this period (CD 204).

- 4.4 This process ensures that contingencies are considered as an integral part of the LDF process, and each DPD includes a Monitoring Framework with relevant indicators.
- 4.5 If monitoring were to show inadequate delivery of affordable housing over a sustained period following adoption of the DPD this could trigger the need for review of the related policies, either of this DPD and/or of the Core Strategy. Indeed, adoption of the RSS to 2026 will establish a further basis for CS review, and the possible results of the current review of Local Government in Devon may add cause for this over a new administrative area. Indeed, changes at the national level might also trigger the need for a review. If a more immediate solution were required then the Council could permit departure sites in the short term, whilst the policy review took place.
- 4.6 However, the key task for the next several years is considered to be making progress with site allocation DPDs to assist in the acceleration of housing delivery. Adoption of this DPD will help to establish the basis for this to be done.