

**South Hams District Council LDF
Affordable Housing DPD Examination**

**Session 2
Allocated Sites Tests 4 and 6 AH2**

**Statement on behalf of
Cavanna Homes Limited**

D2 Planning Ref: 052-08

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- 1. Is there inconsistency between the targets identified and the provisions of the Core Strategy and could this confuse developers when calculating land price/valuations?**
- 1.1. PPS3 paragraph 29 states that an overall plan wide target for the amount of affordable housing be provided. Policy CS6 of the adopted Core Strategy sets out a clear policy requirement for 50% affordable housing from all sources having regard to a number of criteria. This is in line with the Inspector's comments at paragraph 9.23 page 24 of his report into the Core Strategy. (CD180)
- 1.2. The DPD introduces inconsistency and confusion into this policy by requesting higher levels of affordable housing on certain sites e.g. Rural Areas. On the basis of the Inspector's recommendations on the Core Strategy, the objectors have secured development sites on the basis of 50% affordable housing e.g. land at Bottle Park/Harris Way, Lee Mill. The Local Planning Authority are now requesting 60% affordable housing. This has not been factored into their original viability assessment. Accordingly as the Core Strategy Inspector noted that if the affordable housing target is too high then there is a real chance that sites will not come forward for development. Indeed this view has been subsequently endorsed by the Panel who conducted the Examination in respect of the Draft RSS. (Paragraph 6.11, CD104).
- 1.3. There is inconsistency between the Core Strategy and the DPD and this will have an impact on the delivery of affordable and open market housing. This is a matter which the LPA have not addressed.

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2. **Do the notional development schemes provide a robust and credible evidence base to support the specified target/what evidence justifies a higher target from the Rural Areas?**
- 2.1. The Council's Viability Report was prepared and published in November 2007. The report makes reference to Housing Market Conditions in Appendix III and concludes:
- “We have seen no signs pointing to anything other than the continued relative buoyancy of the South Hams Market.”**
- 2.2. We would suggest that since the beginning of 2007 and the impact of the 'credit crunch' that housing market conditions have altered dramatically with falling house prices, lack of mortgage availability and developer confidence at its lowest for many years.
- 2.3. The Core Strategy Inspector considered this issue and was sceptical of its usefulness. He stated: (paragraph 9.18)
- “... As with any such study the methodology included a number of assumptions and a small change in any of these variables could have a comparatively lesser effect on the outcome ...”**
- 2.4. We would suggest that the report and its assumptions need to be reconsidered in terms of site values, build costs, applications fees etc. for it to have any credibility.
- 2.5. The Core Strategy Inspector did not question the general scale of the affordable housing need in the District and considered that the issues related to identifying the highest target that was both viable and sustainable. The LPA have not considered this advice. The Core Strategy Inspector was concerned that a 66% target for affordable housing was not viable or practical in the circumstances where the spatial planning strategy can only at best deliver partial solutions to the local problems. Accordingly a 60% target in the Rural Areas effectively results in the same issue of viability and practicality. As stated the objectors have secured land on the basis of 50% affordable housing and will not be able to bring these sites forward if 60% affordable housing is required.

3. Are the boundaries of the Plymouth Urban Fringe, Area Centres, Local Centres and rural area clearly defined in the Proposals Map?

- 3.1. It is considered that a Proposals Map should adequately define all of the above. It is considered that the LPA should produce a plan.

4. Is there evidence to show pre assessment of allocated sites thereby avoiding anomalies or inequity in respect of windfalls for schemes of a similar number of dwellings?

- 4.1. There is no evidence to demonstrate this issue. Cavanna Homes have control of land at Lee Mill which the Council wish to see develop, however there is no evidence of any pre assessment of this site from the Council. Accordingly it is possible that a windfall site for the same number of dwellings could have less affordable housing.

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- 5. Could the different targets deter/frustrate developers from bringing forward sites within the rural areas and are the targets consistent with national and regional guidance?**
- 5.1. As already stated in earlier submissions, the 60% target for the Rural Areas will deter the objectors from developing land under their control at Lee Mill and elsewhere. Their current application makes an allowance for 50% in line with the Core Strategy. If this is not acceptable to the Local Planning Authority then they will (in the current market conditions) not proceed with the site. Such an approach is exactly what national guidance, the inspector who conducted the Examination in the Core Strategy and the Panel who conducted the Examination in respect of the draft RSS were trying to avoid.
- 5.2. It is recognised that the LPA have a backlog in housing land supply to meet their housing requirements. This will only make the position worse.