

**South Hams Local Development Framework
Affordable Housing DPD Examination**

**Session 3
Unallocated/Windfall Sites
Tests 6 and 7, Policy AH3**

**Statement on behalf of
Cavanna Homes Limited**

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CONTENTS

- 1. What evidence demonstrates that ‘no threshold’ approach would be viable and is the evidence robust and creditable?**

- 2. What evidence demonstrates that commuted sums will be used to deliver affordable housing in a timely manner and assesses the availability of such land. Is this evidence robust and creditable?**

- 3. Is there a risk that commuted sums would not be used in the area of greatest need?**

- 4. Is paragraph 7.60 contradictory?**

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- 1. What evidence demonstrates that ‘no threshold’ approach would be viable and is the evidence robust and creditable?**
- 1.1. PPS3 paragraph 29 sets out the tests for affordable housing provision. Policy AH3 states the affordable housing threshold for a single dwelling and justifies this on the basis of the viability study even though that study was based on a 50/50 tenure split as opposed to a 60/40 split favoured by the Council. This approach does not consider the advice in PPS3 and indeed the viability report advises that it does not comment on planning policy. An on site contribution for affordable housing cannot be made for a single dwelling scheme. Accordingly an equivalent off site or financial contribution cannot be made either. This approach is therefore flawed.
- 1.2. Turning to sites containing 2 to 5 dwellings, the Council indicate that such a site can contribute 20% towards affordable housing as a financial contribution off site. This indicates that it is not practicable to deliver affordable housing on site at this threshold. This lacks clarity and coherence.
- 1.3. With regards sites containing 6-14 dwellings, the Council believe that 35% can be delivered on site. The Policy does not state that this is a target for affordable housing at this threshold and therefore the Council will seek this level of provision on all windfalls sites regardless of specific circumstance and economics. This is contrary to Policy CS6 in the Core Strategy.
- 1.4. The latest evidence on housing delivery in the District contained within the Annual Monitoring Report 2006/2007 indicates that housing completions have fallen well below that which is required to meet the Structure Plan provision. The housing provision will increase as a result of the emerging RSS requirement. The Council will frustrate housing delivery and affordable housing target are unrealistic.

2. What evidence demonstrates that commuted sums will be used to deliver affordable housing in a timely manner and assesses the availability of such land. Is this evidence robust and creditable?

- 2.1. There is no evidence to demonstrate that the Council have a strategy to utilise commuted sums on the delivery of affordable housing or that they have identified a range of sites. The latest Annual Monitoring Report 2006/2007 (CD189) advises that the Council hold £378,399 at the start of 2006 and received a further £286,000 but spent £0. The report gives no indication that sites are identified for affordable housing and that this money will be spent on delivering affordable housing in the next year. It seems that matters are being left to allocation of sites through the LDF process which is clearly some time away.

3. Is there a risk that commuted sums would not be used in the area of greatest need?

- 3.1. Given that the Council failed to spend any commuted sums during 2006/2007, and that there is no indication where the commuted sums will be spent. There must be a real danger that it will ultimately be spent on any scheme to provide affordable housing in any part of the District. Clearly this demonstrates a lack of a coherent strategy from the use of commuted sums for affordable housing provision.

4. Is paragraph 7.60 contradictory?

- 4.1. It is suggested that this paragraph is contradictory. The test indicates that all sites (even for 1 dwelling) should provide affordable housing on site but states that it only applies to sites with capacity for 6 or more dwellings. Clearly it is contradictory and should be clarified and amended.