

6/3737

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

**Session 6
Tests 8 and 9
Implementation and Monitoring**

**Statement on behalf of
Cavanna Homes Limited**

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

- 1.1. Section 8 of the DPD deals with viability issues. The flaws within the Adams Integra report have already been highlighted elsewhere in these submissions. To rely on that report represents an unrealistic approach toward the delivery of affordable housing.
- 1.2. A developer will not always know the overall costs of development including Section 106 contributions prior to entering into an option or purchasing land. For the Council to assume that this is the case indicates a naive approach with regard the development process.
- 1.3. At paragraph 8.4 it states that the Council or independent valuer will assess the development viability and they will acquire an 'open book' approach. This does not comply with national guidance. In addition the Housing Corporation does not require an open book approach to demonstrate grant funding. Its approach is to provide viability toolkit. for that purposes. The Council should therefore adopt this approach. Indeed this was the approach they adopted in determining the planning application for the Sherford New Community.
- 1.4. With regards to achieving a reduction in affordable housing provision it appears that the Council have already assumed the levels of affordable housing suggested in the DPD are achievable. It will therefore be difficult if not impossible to negotiate with the LPA to achieve lower levels.

2. Are adequate tools/resources available to ensure the delivery of affordable housing?

- 2.1. It is unclear what tools/recourses are available and how they will be used to ensure the delivery of affordable housing. Further guidance is required.

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

- 3.1. The Inspector who considered the Core Strategy concluded that the Council's approach to include affordable housing thresholds within a separate document to the Core Strategy resulted in: (CD180)

“Fundamental lack of coherence and clarity that has been created splitting the various policy considerations within and between various documents which have varying timescale and statutory weight ...”

- 3.2. He went on to state:

“In all of the above circumstances I conclude that it would be most appropriate to have a consistent strategy percentage target figure applicable to all new housing sites above a certain size threshold or threshold whether allocated or windfalls across the District.”

- 3.3. The Council have failed to take this advice into account and there is confusion between the targets for windfall sites and Policy AH3.
- 3.4. It is recognised in correspondence from the Council dated 14th May 2008 that there is an inconsistency which is to be amended. The objectors await to see the suggested amendment.

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

- 4.1. There is no flexibility within the policies and the Council do not seem to accept that flexibility is required. It is apparent that circumstances have already changed with regards the housing market and the Council have provided no indication on how they will approach this. This is important given the shortfall in housing provision that the District is experiencing.
- 4.2. This is no indication on how monitoring will be carried out and how the Council will react to changing circumstances.