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**APPENDICES (SEE VOLUME 2)**

**RT/A STATEMENT OF QUALIFICATIONS AND EXPERIENCE**

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## **Section 1**

### **Introduction**

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- 1.1 My qualifications, experience and credentials are set out in **Appendix RT/A**.
- 1.2 Tetlow King Planning were first instructed by Midas Homes in July 2007 to provide representations on the South Hams Affordable Housing DPD.
- 1.3 Our further submission relates to Policies AH2, AH2, AH3 and AH4 and their reasoned justification as well as the topic of Implementation and Monitoring. The further submission is based on the objections made to the Submission Draft of this DPD in March 2008 on behalf of our client.
- 1.4 Each matter is dealt with in a separate submission statement. **This statement deals with Policy AH4 Mix, Size, Type and Tenure.**
- 1.5 A summary of the objection is provided together with the suggested policy response. This is then elaborated in more detail under the relevant issue, with reference to current policy, guidance and research on housing and affordable housing matters. The key points relating to the tests of soundness against which the policy is considered to fail are summarised in the conclusion and the relevant recommendation(s) to make the policy 'sound' are set out at the end.
- 1.6 Where reference is made to an item on the Council's Core Documents list, this is shown in emboldened text in brackets with the prefix 'CD'.

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## Section 2

### AH4

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#### Summary

- 2.1 Summary of objection to Policy AH4 of the Affordable Housing DPD and suggested policy response:

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| What part of the DPD is unsound?             | Policy AH4   |
| Which of the soundness test(s) does it fail? | 7 The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base. |
| Why does it fail?                            | See paragraphs 2.2 to 2.8.   |
| How can the DPD be made sound?               | Delete target tenure split of 60:40 and replace with a target of 50:50.  |
| What change is sought?                       | As above.  |

**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?**

- 2.2 The '*strategic target*' for the tenure split between social rented and intermediate housing of 60:40 is not founded on a sound evidence base and therefore fails to meet the seventh test of soundness. Neither the Regional Housing Strategy nor the Housing Needs Market Assessment (HNMA) (**CD175**) prescribes a specific target. Paragraph 6.8 of the Submission DPD refers to this being set out in the Housing Strategy's regional priorities.
- 2.3 It is not clear what is being referred to here. The Regional Housing Pot Allocations for 2006-08 (paragraph 13) states that '*given the significant need for rented accommodation it is proposed that the majority of resources (75-80%) will be directed to providing new social rented*

*housing*', however this is only a broad funding strategy and is not intended to guide LDFs.

- 2.4 The DPD could alternatively be referring to the South West Allocation Statement for the National Affordable Housing Programme 2006-08. This states (page 11) that *'68% of provision will be for social rent and 32% for low cost home ownership. This is a modest shift away from the original target level of 70% social rent and 30% home ownership'*. Likewise this is not a direction to local planning authorities to adopt such a target in their LDFs.
- 2.5 The appropriate evidence base for determining tenure mix is the Strategic Housing Market Assessment. The HMNA was prepared a year before the Practice Guidance on Strategic Housing Market Assessments was published in 2007, meaning that it fails to take on board key points including the need to provide *'estimates of current dwellings in terms of size, type, condition, tenure'* (Core Outputs, Figure 1.1).
- 2.6 The HNMA does not provide such evidence. It does however reveal a *'significant level of need and preference expressed in the surveys for intermediate housing'*. In order to place greater emphasis on intermediate housing, in line with the recognition given to this tenure in the HMNA, the target tenure split would be more appropriately fixed at 50:50.

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

- 2.7 It is not necessary to give greater spatial interpretation. The target tenure split of 50:50 mooted above, with clear reference to determination on a site-by-site basis, taking local circumstances into account, will provide sufficient scope for variation.
- 2.8 Clarification of the circumstances that shall be taken into account when determining the mix, size, type and tenure of affordable housing would be a useful addition in relation to Policy AH4. Part C of the text suggested in our submission on Policy AH1 provides such a list, which could be cross-referenced within AH4. The suggested text includes reference to the viability of the development; any specific abnormal costs; the availability of housing grant or other subsidy; the location and character of the site and its general suitability for affordable housing; the type of housing needed and most appropriate to the locality; the availability of existing affordable housing in the locality; and the creation of mixed and balanced communities.

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## **Section 3**

### **Conclusions**

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- 3.1 For the reasons set out in Section 2, there is no sound evidence base to justify the 60:40 target tenure split set out in Policy AH4. **It therefore fails on the seventh test of soundness.**
- 3.2 In order to make this policy sound, we recommend that the text is reworded along the lines of that suggested above.