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APPENDICES (SEE VOLUME 2)

RT/A STATEMENT OF QUALIFICATIONS AND EXPERIENCE

Section 1

Introduction

- 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 Implementation and Monitoring.**
- 1.5 As this is a general topic and does not relate to a specific policy within the DPD, this submission does not provide a suggested policy response. Instead it summarises our general concerns about the Council's approach to this matter.
- 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'.

Section 2

Implementation and Monitoring

What tools/means are intended to measure development viability?

- 2.1 We consider that the means by which development viability is determined should be decided between the developer and the Council on a site-by-site basis. We do not propose and would not welcome any prescription regarding the tools used to aid the assessment of viability for sites.
- 2.2 Paragraph 8.6 refers to the Affordable Housing SPD. The draft version of this SPD (**CD195**) seeks to impose strict requirements for applicants wishing to submit viability information, which in turn will be assessed by the Council using the 'Grimley Model'. We do not agree with this for the reasons set out in our representations on the SPD but particularly as the model in question is too prescriptive and is not universally accepted. Several of its key assumptions are simplistic and highly questionable.

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

- 2.3 The policies offer minimal flexibility. As noted in our representations on the Submission DPD, an underlying problem is the failure of the Affordable Housing Viability Study (**CD173**) to consider temporal changes that may occur in the housing market. The need to take temporal changes into account is particularly important owing to the time horizon of the RSS, which seeks to provide a planning framework to 2026.
- 2.4 It also a weakness of the Viability Study that it has failed to use any real sites in its assessment. In the absence of such evidence there is no basis for the targets and thresholds set out Policies AH2 and AH3. As stated in our other submissions, these are so onerous that they will deter developers bringing sites forward during even the most buoyant of market conditions. Any fall in land values caused by changing market conditions, as currently occurring, will clearly exacerbate this situation resulting in an overall reduction in housing output, including affordable housing.

- 2.5 There does not appear to be any contingency. As drafted, the affordable housing policies within this DPD will not deliver the desired amount of affordable housing. It is therefore vital that, if they are adopted as currently written, a contingency is put in place. Even if changes are made to improve these policies and make them workable, a contingency will still be required as part of the plan, monitor and manage approach to planning.

Section 3

Conclusions

- 3.1 As drafted, this DPD does not provide sufficient flexibility to cope with changing circumstances and as such it is unlikely that its policies will succeed in delivering enough affordable housing to even come close to meeting the District-wide need. As such it is vital that the policies are amended in line with the recommendations set out in our submissions on AH2 and AH3 and that a contingency measure is included should the rate of affordable housing delivery fall below expected levels. This should be managed through continued monitoring and should be reported within the Council's Annual Monitoring Report and updates of the Affordable Housing SPD.