

Three Dragons has been asked by DNPA to consider whether the Proposed Modifications to the Local Plan, prepared as part of the examination process, require any further viability appraisal. Having reviewed the proposed modifications (including the inclusion of the site at Timbers Road), we have the following observations:

MM38 - **Proposal 7.6 (3) Land at Timbers Road, Buckfastleigh** – This site is comparable to our case study CS3 (80 units) in the South West value area – which was viable, including all policies in the publication Local Plan with affordable housing at 45% – with a headroom of over £383,000 for the scheme or £134,000 per gross ha (after deduction for the benchmark land value). This indicates that the Timbers Road site (Proposal 7.6 (3)) will also be viable, provided that the associated s106 and/or site infrastructure costs are not greater than the allowance in the modelling for CS3 (i.e. s106 costs at £10,400 per market and £3,000 per affordable unit and infrastructure costs at £100,000 per net ha).

MM08 – Future Homes – acknowledges that, '*In 2020 the Government consulted on the Future Homes Standard which, if introduced, would raise efficiency standard beyond the requirements of this policy*.' We allowed for 10% reduction in carbon emissions – at a cost of approximately \pounds 1,200 per unit to meet the draft Local Plan policy. We consider that the costs of meeting the Future Homes Standard, if introduced, will be higher than this, estimated at about \pounds 3,100 per house (\pounds 2,260 flat). Where the current 'viability headroom' is insufficient to meet the additional costs, we would expect the land value to flex to accommodate this.

MM18 – Strategic Policy 3.1 - our understanding is that the proposed modification does not change the overall housing delivery numbers but updates how the housing numbers will be met by year and the process by which housing delivery will be monitored.

MM27 – **Provision of charging points in new buildings -** the viability testing included an allowance for vehicle charging.

On the basis of the above, we do not consider that additional testing is required at this stage and the Whole Plan Viability Assessment and Addendum (SD90/SD91) remain valid.