

SOUTH HAMS LOCAL DEVELOPMENT FRAMEWORK

**Public Examination of the Affordable Housing Development Plan
Document**

LIST OF POSSIBLE CHANGES

SOUTH HAMS DISTRICT COUNCIL

The Council suggests the following minor changes to the DPD:

The Council proposes that, in order to improve its clarity, the following changes **should** be made to the DPD:

1. (Session 1, Q. 6) The first sentence of policy AH1 be amended so that it reads as follows: "All new housing developments, including those on a mixed use basis, shall contribute towards meeting the affordable housing needs of the District."
2. (Session 3, Q. 4). The Council accepts that paragraph 7.10 could be considered to be contradictory as currently written. To resolve this point we would suggest adding the following sentence as a new sentence two to paragraph 7.10:

"However, for reasons of viability and housing management, on-site provision of affordable homes on sites of 5 or less dwellings can be problematic".

And the following addition wording to the end of the final sentence of paragraph 7.10:

"whereas off-site contributions will be sought on sites of 5 dwellings or less".

3. (Session 6, Q.3). There is an error in the monitoring target. A mistake in the document was noted after it had been printed, as demonstrated at paragraph 7.8 where the error was amended using a pre-printed label. However the corresponding targets in the monitoring sector have not been amended. This is an error for which the Council apologises. The targets for windfall sites should read the same as Policy AH3 paragraph 7.8 as amended.

The Council has suggested an appropriate correction for this error in its suggested Statement of Common Ground.

SHDC / List of Possible Changes

The Council considers that, in order to improve its clarity, the following changes **could** also be made to the DPD:

1. (Session 1, Q. 5) With reference in chapter 5 to the Housing Market and Needs Assessment, the DPD could go further to explain that the HMNA was carried out across the wider Plymouth housing market area (Plymouth, Caradon, West Devon and South Hams) and/or include a definition in the glossary, if this was felt necessary.
2. (Session 1, Q. 7). In order to better reflect that the provision of affordable housing will meet the needs of both current and future occupiers, the Council considers that, if it were felt to be necessary or helpful, the second paragraph of Policy AH1 could be re-worded as follows: "Planning permission will be subject to a planning obligation to ensure that the affordable housing provision (the units themselves or any subsidy recycled for alternative housing provision) remains available in perpetuity to meet local housing needs. Any off site contributions will also be secured through a planning obligation."
3. (Session 1, Q. 9). It is essential that the Affordable Housing SPD refers up to the "parent" LDF policies from which it hangs. Converse reference from the DPD to the SPD is not strictly essential, but the Council believes that it will be helpful.

The Council is also preparing to publish a Planning Obligations SPD (draft version is CD199) which will set out the mechanisms for securing Section 106 agreements. Reference to this document could also be added.

The DPD needs to include reference to the principle of Free Serviced Land and Free Serviced Land Equivalence. As drafted, that reference (at paragraph 7.13) is made in the context of the Affordable Housing SPD (CD195) which gives more detailed guidance and explanation of the principle and how it will be applied.

Paragraph 7.13 could be re-titled 'Free Serviced Land Approach' if that was felt useful, or alternatively be titled 'Sources of Additional Information' and include reference to both the Affordable Housing and the Planning Obligation SPDs.

However, if it was felt better to delete all references to SPD from the DPD this could be done.

4. (Session 2, Q. 3). As the DPD does not include site specific proposals, changes to the Proposals Map are not required at this stage. However, to add clarity the Council suggests that the Core Strategy Key Diagram could be reproduced in the DPD for information, making clear the location of Area and Local Centres and the PUF.

SHDC / List of Possible Changes

5. (Session 2, Q. 4). Any windfall site, including those in a rural area would be subject to policy AH3. The Council is of the view that the DPD makes this perfectly clear. However if the addition of “(Windfall Sites)” to the title of policy AH3 and/or the first sentence of the policy, would further add further clarity, the Council would readily accept such an addition.
6. (Session 4, Q.1). The DPD Monitoring Framework already includes a break-down of the number of affordable units by Plymouth Urban Fringe, Area and Local Centres and Rural Areas, as suggested by GOSW (GOSW response to Submission Stage DPD Rep1). The Council does not consider that the additional breakdown by tenure suggested is necessary, but would be prepared to include it if it was felt to be a necessary and useful addition.
7. (Session 4, Q.1). The Council does not consider that full reiteration of the evidence is appropriate within the DPD. For a fuller understanding of the detailed conclusions if the HMNA (CD 175), the Demand/Supply Analysis (CD 174) and the Affordable Housing Viability Study (CD173) reference should be made directly to the original source document. However, if it were felt necessary to set out the evidence in more detail within the DPD itself the Council would be prepared to do so.
8. (Session 5, Q. 3). If it was felt that it would aid clarity, the Council would be prepared for the sentences in paragraph 5.2 under the sub-heading Parish Housing Needs Survey to be re-ordered as follows:

“These surveys provide specific information on housing needs within rural communities. Parish Needs Surveys are usually undertaken in conjunction with the Rural Housing Enabler and Parish Councils.”