

NEWTON & NOSS PARISH COUNCIL

~ Clerk to the Council: Mrs J Eschbaeher ~
 17 The Fairway Newton Ferrers Plymouth PL8 1DW
 Telephone: (01752) 873305 E-Mail: newtonnossclerk@jacki.demon.co.uk
www.newtonandnoss-pc.gov.uk

Forward Planning Department
 South Hams District Council
 Follaton House
 TOTNES
 TQ9 5NE



6th March 2008

Dear Sirs

Consultation: South Hams LDF

1. Affordable Housing Development Plan Document: Submission Stage
2. Affordable Housing Supplementary Planning Document: Draft Stage

In response to the above planning documents, the following comments and suggestions are submitted on behalf of the Parish Council:-

1. Affordable Housing DPD

Para 5.2

a) If the long-term future of the Rural Housing Enabler is in doubt, then this paragraph needs to be re-worded to encompass the probable demise.

b) There is no mention of the time frame of a recent Parish Housing Needs Survey, i.e. within, say, the last three years.

Para 7.16

It is suggested that "...the Council must judge whether it is the most suitable possible 'exception site' ..." should be altered to "...the most practicable 'exception site' ..." in order to take into account the practicalities of availability. Without this change, the situation stated in para 7.18 will perpetuate.

Para 7.18

The suggested change in para 7.16 will help to alleviate this situation.

The Council should make a statement with regard to the acceptability of exception sites in rural areas and what will be done to encourage them.

Para 7.19 AH3: Unallocated Sites

This paragraph needs to say how commuted funding will be kept within the locality of origin (e.g. 5 miles) otherwise there is the risk that the requirement to develop balanced communities will not be met across the whole District and thus desirable rural areas may be disadvantaged.

Also, such commuted funding – including interest accrued – needs to be ring-fenced solely for affordable housing.

Para 8

This is repeated in the AH-SPD, an overlap which could be simplified.

continued...

2. Affordable Housing SPD

Para A5.6 Housing Strategy

There would appear to be a significant timetable mis-match between the Council's plan to publish a new Housing Strategy in the summer/autumn of 2008, midway through the Affordable Housing LDF consultation process. Surely the Affordable Housing consultation should be delayed until after a full review of the Strategy has been completed.

Para B1.1 Housing Need

By the time the AH-DPD has been adopted in January 2009 (*para A5.3 refers*), the HMNA will be out of date! (3 years)

Para D5.5

The Table D1 should state clearly the strategy date for the price guide [i.e. is it valid from January 2008 or January 2009?], otherwise there will be arguments about where the BCIS index will apply.

Sections E2 and E3

Commuted contributions must be used to subsidise AH development within the locality of the original development (say 5 miles). Otherwise popular resort areas such as Newton & Noss/Dartmouth/Salcombe could end up providing housing for urban areas (Totnes/Ivybridge), thus failing to reduce housing needs locally, further ghettoising the District and disadvantaging the popular rural areas.

Table E1

Table E1 (as Table D1) should indicate a starting base date for the reasons stated above.

Para E5.2

The commuted land fees/tax should be ring-fenced solely for the direct provision of affordable housing. There should be no capacity for it to be diverted to any cause other than affordable housing.

Paras F1.1 and F1.2

Para C3.3 welcomes innovative approaches to affordable housing. F1.1 pours cold water on this innovation.

Paras F1.1 to F1.5 should be re-drafted to be more explicit about how innovative approaches can be better included without reversions to "pet" RSLs.

Paras F1.1 and C3.3 are mutually contradictory in spirit.

Para F1.5

This needs to be explicit as to how RSLs will be chosen and evaluated to avoid the perception, if not the fact, that there is a lack of openness with regard to the choice of RSLs. Without open competition across the District (as opposed to individual sites), the Council may not be obtaining best value in terms of design, innovation, cost and quality of overall provision. The AH-DPD refers explicitly to a quality built and natural environment. [*paras 3.10, SO3 and 4.3 refer*]

Para F2.5

In rural areas the Council must give priority to local applicants in need.

Paras F3.2 and F3.3

Once again, these seem strongly against the innovation set out in C3.3. This must be more inclusive to ensure best value and quality.

Para F3.7

It is suggested that "...a standard Section 106 agreement..." is changed to "...a model Section 106 agreement...".

continued...

2. Affordable Housing SPD *continued*

Para F4.1

It is suggested that the wording should include a reference to high design and architectural standards.

Appendix B

It is not clear how "preferred" RSL partners are chosen. This must be a transparent process. The LDF must state the criteria for the inclusion of RSLs, community land trusts, self-build and other initiatives (as referred to in para C3.3) as preferred providers.

CONCLUSION

As the SPD stands, there is a real risk that affordable housing will only be developed on the cheapest land in the cheapest parts of the District and that volume needs will outweigh innovation, contrary to paras 3.10, SO3 and 4.3 in the AH-DPD. Attractive, highly sought-after rural areas are at risk of not having their housing needs adequately met by the present drafting of the SPD.

GENERAL OBSERVATIONS ON THE TWO DOCUMENTS

Much space is wasted between the AH-DPD and SPD in repeating definitions on affordable housing, mix and tenure, social rented housing, etc.

During the life of the documents – which have arisen over different time frames – definitions have and will change.

To avoid confusion and the need for endless updating/revision between the two documents as legislation and circumstances change – consideration should be given to putting the master definitions in one document and referring to them in the second.

In the long term this will be more efficient and effective and avoid confusion and contradiction.

Yours faithfully

J C Eschbaecher (Mrs)
Clerk to the Council

