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Date: 7 March 2008  
Our Ref: JAS/ M4/1012-13  
Your Ref:

**BY POST AND EMAIL**  
[forward.planning@southhams.gov.uk](mailto:forward.planning@southhams.gov.uk)

Dear Sir or Madam

**RE: SOUTH HAMS LOCAL DEVELOPMENT FRAMEWORK – AFFORDABLE HOUSING  
DEVELOPMENT PLAN DOCUMENT – SUBMISSION STAGE**

We represent the **South West RSL Planning Consortium** which includes all the leading Registered Social Landlords (RSLs) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

Below we have set out our comments in relation to the draft Development Plan Document on Affordable Housing and the policies within it.

We are extremely pleased to see that the Council is committed to tackling the chronic affordable housing shortage in the South Hams district. As the Council correctly states, the affordability crisis is one of the worse in the country and in order to address this situation, appropriate action is needed. However, we have some concerns over whether some of the policies will pass the test of soundness. The concerns are set out below along with some other suggestions:

**Policy AH1 – Affordable Housing Provision**

We understand that the Council is keen to ensure that new affordable homes are retained for those who fall within the identified levels of need. They are correct to ensure this occurs by subjecting planning permissions to planning obligations, but not on every occasions. When Housing Associations are providing the affordable housing themselves it is not essential to subject them to planning obligations or Section 106 agreements. Housing Associations are mostly not-for-profit organisations whose main purpose is to provide affordable housing to those in need and are also governed by strict Housing Corporation rules. Ensuring they provide affordable housing through a legal agreement may therefore be unnecessary, and a contribution attached to the planning permission would be more appropriate.

We are also not convinced that it is necessary to remove permitted development rights from every new affordable home. RSLs should be able to freely alter and enlarge homes to meet local needs. Removing PD rights may only delay RSLs ability to provide the necessary accommodation to larger families when and where it is needed.

#### **AH2 – Allocated Sites**

We agree with the Council that new housing sites should deliver as much affordable housing as is viable, however, we are concerned that affordable housing requirements could prove to be counter-productive in the Council's attempt to provide as many affordable housing unit as possible. We are apprehensive about affordable housing requirements above 50%, as they may not be viable. This would discourage developers from delivering general market housing and consequently affordable housing units.

#### **AH3 – Unallocated Sites**

We welcome the Council's approach of having separate affordable housing policies for both allocated and unallocated sites, these two types of site have different circumstances and so warrant two separate policy approaches. However, this proposal was not present in the Preferred Options paper and does not seem to have been subject to a sustainability appraisal. We therefore can not support this policy as it appears to fail test of soundness 3.

#### **AH4 – Mix, Size and Tenure**

Supported.

#### **AH5 – Rural Exceptions Sites**

Supported.

These comments are intended to be constructive and we look forward to developing a mutually beneficial relationship as you take your Local Development Framework forward.

Yours sincerely

**JAMIE SULLIVAN**  
For and On Behalf Of  
TETLOW KING PLANNING

Cc: Devon and Cornwall Housing Association  
Guinness Trust  
Magna Housing Association  
Sovereign Housing Association  
Tor Homes  
William Sutton Housing Association

Hastoe Housing Association  
Sarsen Housing Association  
Spectrum Housing Group  
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