

**HOPWOOD SWALLOW LLP**

CHARTERED ARCHITECTS AND  
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Ms K Duffield  
Programme Officer  
South Hams District Council  
Follaton House  
Plymouth Road  
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22 May 2008  
312004 261

Dear Karen

**AFFORDABLE HOUSING DPD EXAMINATION**

Please find enclosed our Examination Statement in respect of the above, together with a further copy of our response to the Affordable Housing DPD Submission Version dated January 08 and Affordable Housing SPD dated January 2008 on behalf of

The Dartington Hall Trust

Mr M Sterland

Mr G Patch

Mrs C M Seager-Berry

Hopwood and Swallow

Would you kindly acknowledge receipt in due course.

Yours sincerely

HOPWOOD SWALLOW LLP  
CHARTERED ARCHITECTS AND CHARTERED TOWN PLANNERS

Enc As referred to above

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**SOUTH HAMS DISTRICT COUNCIL AFFORDABLE HOUSING DPD EXAMINATION**  
continued

**DAY 1 17 JUNE 2008**

**PM - SESSION 02**

**ALLOCATED SITES**

**ISSUE 1.0**

We have referred you to the Inspector's Binding Report on the Core Strategy and have raised concerns at length in our representation to the Submission Version of the Affordable Housing DPD over the inconsistent target levels which exceed that specified by the Inspector following the Examination into the South Hams District Council Core Strategy DPD. There appears to be little justification over varying targets or any justification that they should seek a figure in excess of 50% as previously stated by the Inspector at the Independent Examination.

The Council states that there is a consistent need to deliver Affordable Housing across the whole of the South Hams District, both at the Plymouth Urban Fringe, within Local and Area Centres, and in Rural Areas. By providing higher targets within the rural areas, there is a strong likelihood that developers and house builders will seek to develop in areas where lower affordable housing targets are sought and therefore, there is less likelihood that the needs of the rural settlements will be met. Given the rural nature of the South Hams District and

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**SOUTH HAMS DISTRICT COUNCIL AFFORDABLE HOUSING DPD EXAMINATION**  
continued

the number of rural settlements it contains, this is an important issue. The Council should be seeking an affordable housing target across the District up to 50%, subject to viability.

**ISSUE 2.0**

We do not believe that the notion of development schemes provide a robust and credible evidence base to support the specified targets, nor do we believe there is sufficient evidence to justify a higher target in rural areas.

**ISSUE 3.0**

This Council has over many years utilised the Policy framework of clearly defined development boundaries for settlements. As such, the Plymouth Urban Fringe, Area Centres and Local Centres are well defined, together with larger rural settlements. We do however believe that these development boundaries should be appropriately reviewed as the majority of these boundaries have not changed for some 15 to 20 years and as such, the majority of land within the development boundary has been taken up and there is a severe shortage of development land to meet the district wide housing need.

**ISSUE 4.0**

Presumably, pre-assessment of allocated sites will be undertaken as part of the Local Development Framework process and will relate to specific DPDs for each settlement. We would hope that the viability, deliverability and sustainability of

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## **SOUTH HAMS DISTRICT COUNCIL AFFORDABLE HOUSING DPD EXAMINATION**

continued

each site to be allocated is clearly assessed properly by The Council through their process. Given the target figures that are identified in Policy AH2, there will clearly be anomalies or inequity between allocated and windfall sites as Policy AH3 requires only up to 50% affordable housing to be achieved on site for 15 or more dwellings.

In order to mitigate any anomaly, the percentage target overall should be reduced to 50% subject to viability etc on all allocated sites.

### **ISSUE 5.0**

We believe that the different targets may well deter and or frustrate housing developers from bringing forward sites within rural areas for the reasons stated previously and as related to our Representations to the Submission DPD dated 07 March 2008. Our understanding is that the Draft RSS suggests that various Authorities should seek up to 30% affordable housing in their various administrative boundaries. Therefore, in terms of the targets sought, it could be argued that the DPD is not consistent with Regional Guidance. This also generally applies in respect of PPG3 and the Policies contained within that document.

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