

SOUTH HAMS DISTRICT COUNCIL SHERFORD AREA ACTION PLAN

Schedule of Suggested Possible Change and Minor Amendments

This document comprises Red Tree's second submission on the 'Schedule of Suggested Change and Possible Minor Amendments'. This note includes those comments previously submitted and any additional comments on new items.

Red Tree agrees with the suggested changes, with the exception of those discussed below (in the order of the schedule).

Para / Policy (as per column 1 of SHDC's schedule)	Red Tree comments
PPS3	Accept, subject to confirmation that as a result no material changes to the policy occur.
Other Strategies	Accept, subject to confirmation that there is no material change in meaning as a result.
1.22	This amendment should refer to paragraph 1.23 not 1.22.
7.29	It was agreed at the Service Providers Panel Hearing that some land on the north-eastern edge of the proposed development near Deep Lane junction (not the neighbourhood centre) would be reserved for a Type 2 station. A crime rate benchmark will be set at the outset and should it rise above this level, then the land will be released to the Police Authority to build the station. This should not be phrased as a delivery responsibility on the developer.
7.42	Red Tree has proposed and supports on site generation and the AAP's emphasis on the potential benefits to the community itself, financial and educational. If, however, the generation is taken off-site the same close association with the community would be lost and it would make more sense for contributions to be made in lieu to more efficient scales of delivery regionally or nationally. A compromise of one or two turbines, for instance, remote from the site would achieve neither the benefits of association with community nor production efficiency of larger scale generation.
7.58	Red Tree objects to the new wording proposed for paragraph 7.58 raising the requirement for Lifetime Homes provision at Sherford to 20%. Sherford is designed as a sustainable community. Its urban design, built around walkable neighbourhoods, accessible high quality public transport, extensive community facilities, fine grain commercial and retail provision, multi-layered

	<p>renewable energy and housing provision all aspire to produce a sustainable community where people can live and work and families can prosper.</p> <p>Key to the family friendly environment is a mix of tenure types, mix of housing sizes and community facilities such as schools, youth centres, a sports hub and playing fields, the Community Park and the Town Hall. Many a new community has set out with just such an aspiration only to find that in a single generation the schools close, the shops become empty, and the community facilities lie empty and unused.</p> <p>This process of decline in community should not be a surprise to us. A greater pension provision for the old, significantly increased wealth and a higher proportion of home ownership lead to increased numbers of family homes being occupied by older couples and, of most concern, single older or disabled persons.</p> <p>There is a shortage of family housing in the UK and the continuing demand leads to price increases that have taken many families out of the homeowner market. Whilst it is of course the right of every individual to live where they want, we must also be mindful of the key requirement for a sustainable community - children.</p> <p>Children attend the local schools thereby reducing the need for the car to be used as parents transport their children to neighbouring schools which have vacancies. Also, families with children spend a higher proportion of their income on food, clothing and the other necessities of life thereby supporting local retail provision. Finally, children are the key users of sports facilities and community groups, and most importantly, the interaction of their parents through school and sports leads to a social cohesion that cannot be forced upon a community from the outside.</p> <p>People should be able to stay in their homes through the aging process. Red Tree's proposal is to ensure that all the homes delivered at Sherford can be adapted to cater for the normal loss of mobility that can occur through older age, or, through minor accident and injury. However, and this is the departure from the Lifetime Homes standard, Red Tree believe that family housing should not be taken up by those with substantial disability. Red Tree is very mindful of the requirements that these residents have which is why we fully</p>
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	<p>support a broad mix of housing and tenure types, including 10% which meet all of the Lifetime Homes standards¹. Sheltered housing and apartments are more appropriate for residents with this type of disability.</p> <p>South Hams District Council in their Schedule of Suggested Change and Possible Minor Amendments make two statements that need response:</p> <ol style="list-style-type: none"> 1. <i>“The Lifetime Homes concept increases choice, independence and longevity of tenure, vital to individual and community well being”</i> <p>As outlined above, Red Tree would question whether this concept leads to community wellbeing or in fact leads to a community that can no longer sustain the basic building blocks of a vibrant society. Indeed housing that allows for reducing occupancy in static living space not only restricts mobility within a community but contributes to inefficiencies in housing and energy use. The problem is exacerbated by the availability of equity release borrowing opportunities. Housing that have been converted via Lifetime Homes standards to total care homes, but which have met and exhausted the use they were designed to cater for, also have to be converted back otherwise they would be completely removed from the family housing stock.</p> <ol style="list-style-type: none"> 2. <i>“the additional costs of incorporating the standards should normally be between 0.5 per cent and 1 per cent of scheme building costs”.</i> <p>This sentence is open potentially to different interpretation. If it is taken literally to mean total ‘scheme building cost’ (all development delivery costs including housing, community facility, infrastructure etc) then 1% is a very substantial number to impact the development with. Even if the intention was to limit to housing cost alone this still represents a substantial cost relative to the questionable long term gain. It is presumably meant to be a figure tempered by the proportion of requirement (in this case 20%).</p> <p>There is some question as to the selective nature of the evidence base quoted, given the wide range of values attributed to the provision of Lifetime Homes Standards by Quantity Surveyors, and the extensive caveats that Walker</p>
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¹ Reference – Red Tree planning application, Masterplan Book, page 301, 3rd bullet point.

	<p>Richardson add regarding conditions relating to this measurement. Further the report quoted was written in 1997.</p> <p>Red Tree would also suggest that the research by the Joseph Rowntree Foundation, by focusing purely on plot build costs, ignores two fundamentals within housing development.</p> <p>Firstly, it does not take account of the additional land required to service the extra width parking spaces. Parking provision on any development consumes considerable amounts of very expensive development land and the Lifetime Homes requirements require this provision to be increased.</p> <p>Secondly, the requirement for living rooms and habitable homes on ground floors and the positioning of rooms to allow for lifts restricts many high density designs that are necessary for the delivery of affordable housing for families. These houses are built over two and half and three stories and are a fundamental element in any development since the introduction of PPG3. Their restriction would have a significant impact upon the economics of development.</p> <p>This issue, we would suggest, illustrates how a late addition of requirement, which has not been subject to the extensive debate across a range of disciplines and stakeholders, can lead to a skewed and ill-thought through proposal that inadvertently perhaps and with the best intentions may lead to outcomes diametrically opposite to those planned.</p>
SNC11 (5)	Accept, but perhaps better expressed as “an average of at least 50 dwellings/hectare”. Averages are not usually best expressed as parametric.
SNC12, 13 and 14	Accept principle, but the word ‘predominantly’ is now repeated in the same sentence.
7.109 (b)	The first sentence of this clause is welcomed as a clarification. The words “ <i>in phase with the development</i> ” are inappropriate for a facilities led development. Therefore we recommend that these words (“ <i>in phase with the development</i> ”) are deleted from this suggested amendment.
Glossary	Red Tree is not comfortable with the amended definition of affordable and intermediate housing until we have complete clarity of the anticipated effect of discounting relative to Red Tree’s understanding of the suppressing effect on values of local covenants. This requires dialogue with the local planning authorities, the Housing Corporation and other stakeholders.

As a general point Red Tree would suggest that it is essential, given the level and detail of debate through the Examination, that the drafting of spatial matters is particularly clear and leaves no room for doubt or misinterpretation.

For example:

Policy SNC1 – Strategic Requirements

Para 4 reads: *“Form the easterly extent of development in the area along the bottom of the Sherford Valley (subject to appropriate environmental and flood protection setbacks from the streamway).”*

It would be more precise to add: *“and specifically shall not extend eastwards beyond the Sherford Stream south of East Sherford Farm.”*

Policy SNC15 – Buffer Zones

Add point 4) Community Park – a single unified body of land of at least 200 ha which further establishes the eastern extent of the new community and provides a buffer to eastward development into the South Hams.