

Councillor Jacqi Hodgson
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Submitted by email to plymouthplan@plymouth.gov.uk and four paper copies delivered by hand

8th January 2018

Joint Local Plan Team,
Planning Department,
Ballard House,
West Hoe Road,
Plymouth.
Devon. PL1 3BJ

Dear Sir / Madam,

Re; Pre-submission Regulation 19 Consultation – Joint Local Plan (JLP) 2014 - 2034

Thank you for your recent correspondence confirming my being able to speak at the public examination of the above Joint Local Plan. In May 2017 I was elected as County Councillor for Totnes and Dartington; the division I now represent in this capacity includes the parishes and villages of Berry Pomeroy, Dartington, Harberton & Harbertonford, Staverton & Landscope, and the town of Totnes. I would therefore formally request to also speak to Matter 8 Policy Area Strategies, Thriving Towns and Villages under the Main Town Session for South Hams, Dartmouth, Ivybridge, Kingsbridge and Totnes.

I wish to make the following submission with regard to the JLP to be considered in conjunction with and further to my previous submission dated 25.4.17. These comments are with regard to Matter 3 Housing and the housing requirement, Matter 5 The Economy, Matter 8 Policy Area strategies, Thriving Towns and Villages, Housing Delivery in Thriving Towns and Villages area, Matter 9 The Environment and Matter 10 Other Development Policies, Management of the development plan to deliver healthy communities and quality homes.

Matter 3 Housing

It is well known that there is a growing crisis of housing need and homelessness across the UK due to rising costs of housing in both the bought and rental sectors. The South Hams is seriously challenged by having a low income to high housing cost differential that has generally resulted in lower income families and individuals (in particular younger people who have grown up in the area) and moving away and being unable to return. At the same time the rising costs of housing in Cities in the UK has encouraged older people to sell and downsize and move to the South West resulting in the inward migration of older residents who can afford new homes; this has affected and put pressure of the market such that house prices and rental costs continue to increase, houses remain empty (many simply land banked) and there is a distortion in local society towards retired and elderly people with young people who work in the area needing to travel in as they cannot afford to live where they work.

A clearly visible outcome of this problem that is not addressed in the JLP is the rapid rise of people living in caravans and campervans parked on the roadside. Some of these are traditional travelers, but a rising number are economic travelers, those who cannot afford a home. When an enforcement order is issued there is generally nowhere properly organized for these people to go and cater for traveler needs, instead they can only move on and park on another nearby roadside, when the problem for them and the wider public

continues. In the just the last 2 years six new illegal traveler camps have set up in Dartington and Staverton ward; they have no-where else to go. There is a clear need for traveler sites and the JLP fails to address this. The sites that are needed should be welcoming and provide for the basic needs such as water, electricity, sewage and domestic waste.

Similarly the number of homeless people living on the streets of towns is growing across the UK. In Totnes the estimated number of rough sleepers is currently around 17 individuals. Four years ago a forty two year old man died of hypothermia in an alley way in Totnes. These are people who need help, help in the form of progressive rehabilitation and shelter met through public services. B&B on cold nights is not enough. This should not just be left to the voluntary sector to address.

The UK housing need that underpins the OAN (Objectively Assessed Need), that is part of the equation for the JLP is primarily determined to ensure the opportunity of a home for all UK residents. There is also clearly a growing need for more affordable housing solutions that are not just dependent on private developers to deliver (which at 80% of the local market cost is well beyond the means of many on a low income). Truly affordable housing options that have been successful in the past across the UK have included social housing provided by Local Authorities, cabins provided for rural workers, houseboats on waterways and more recently converted shipping containers on brownfield sites and tiny houses in gardens. While Community Land Trust options are stated to be welcomed, this is still essentially relying on the community and voluntary sector to provide public services; there needs to be more support and initiative provided by the local authority to support these initiatives (Cornwall County Council for example provided a dedicated CLT Officer). These and other potentially beneficial affordable housing options are not explored or supported in the JLP, yet in the rural environment of South Hams creative initiatives could make a significant contribution to meeting housing need.

The need for properly commissioned traveler sites, public health needs for rough sleepers and creative opportunities to enable truly affordable housing solutions is not met in the JLP and this is a serious and fundamental omission leaving JLP unsound as it is unlikely to meet locally identified housing need in the South Hams.

Matter 8 – Policy Area Strategies

To date there are almost thirty local Neighbourhood Planning groups developing neighbourhood plans in the South Hams. Most of these have carried out housing needs surveys through detailed local public consultation. Considerable public funding and many hours of volunteer time has been spent on this work, yet the application of this local information and knowledge has been largely ignored. This is a missed opportunity (and a waste of public money) as there has been a clear willingness on behalf of the groups (many of which have participated in SHDC workshops etc.) by officers developing the JLP to engage with the public to weave together the OAN, the JLP and locally identified housing needs and similarly to develop the housing strategies from the bottom up rather than simply respond to landowners offering land as extortionate prices.

Traditionally the rural area of South Hams has developed as towns encircled by rural parishes with hamlets and villages generally within a day's walk of the town which would provide their economic centers, markets, services etc. The Market and Coastal Towns initiative of 2001 looked at this and recognized the value of the relationship between the town and this rural hinterland, much of which developed directly to support economic needs and trends. Regrettably the development of large swathes of suburbia, filling fields on the outskirts of towns filled with look-alike houses, many of which do not meet local needs cuts across much of this and simply replicates the increasingly homogenous suburbs that bear little or no relationship to the local area, local jobs or provide any benefit such as local transport services. A key problem identified between Totnes and Dartington by both Neighbourhood Plan groups has been the cutting into the green wedge by development encroaching between the two settlements. This is considered to undermine the individuality and sense of place of both settlements, a pattern of development that is similar elsewhere but on this border area this has been further jeopardized by the JLP identifying sites as being part of Totnes, but which actually fall into Dartington parish (I discussed this in my previous submission).

A piece of work I have carried out considers what could be a model for fair share of new housing development based on the traditional organic growth pattern across the parishes and towns of South Hams that could provide a robust strategic framework for new housing that follows the traditional organic growth pattern,

works within the market town model and the objectives of Neighbourhood Planning. This model shown in the table at Appendix A a model for cluster based development could be replicated across the South Hams (and the wider JLP area) and also provide useful and relevant guidance for Neighbourhood Planning groups individually and in their associated cluster groups.

Matter 9 Environment

The rise of the use of the car has been the key game-changer and while independent travel can improve people's lives, it should not be seen as the main design feature to be accommodated; the true costs of car travel, i.e. emissions that cause local air quality problems and internationally are contributing to climate change.

The potential impact of the spatial strategy, in particular as it would impact on the A 385 / A384 in Totnes and Dartington is incompatible with the current difficulties already evidenced by low air quality from traffic emissions along this route. This therefore makes the JLP unsound as it would be unable to deliver additional housing as proposed in this area without further detriment to the air quality and congestion along this route and its overall adverse contribution towards climate change (a clearly stated objective in the JLP)

I would like to speak on these matters at the oral hearing for this Joint Local Plan.

Yours faithfully,

Jacqi Hodgson

Cllr. Jacqi Hodgson

Encl Appendix A

c.c. Strategic Planning Dept.
South Hams District Council,
Follaton House,
Plymouth Road,
Totnes,
Devon. TQ9 5NE

Appendix A - Joint Local Plan Submission 08.01.18

Housing numbers – strategically assessing the housing allocation for delivery in Dartington based on a fair shares / traditional growth delivery model– a proposal by Cllr Jacqi Hodgson

This model could be replicated across the South Hams (and across the wider JLP area)

Neighbourhood Plans will be obliged to meet Housing needs based on an OAN (Objectively Assessed Number) currently being estimated for the Joint Local Plan (previously) SHDC Our Plan, giving a new housing target across the District.

The following assessment was produced for and discussed by Dartington Neighbourhood Plan steering group which has endorsed this model of development and would therefore support a model of no more than 287 new houses being built in the Parish between 2014 and 2034 (this would be based on delivery model (B) outlined below.

The development proposed under the JLP commences in 2014 and takes into account all housing developments commenced or provided with planning permission since the start of that year. To date (8.1.18) the number of new homes developed or built in Dartington just in larger developments since 2014 is already 214. Given the rural nature of the parish, this number would be higher if all new developments were to be taken into account. Similarly the main town of Totnes is scheduled under the JLP for 668 new houses. The number commenced or provided with planning permission is currently 533. This information on site developments to date is detailed below for reference.

On that basis I have extrapolated figures for new housing that Dartington could be required to deliver based on a fair share across the parishes of South Hams for an estimated OAN scenario target of 8,000 new homes across the district looking at three different delivery models as shown in table 1 below:

- A. New housing based on equal share of growth percentage of the current households by town / parish
- B. New Housing based on equal share of growth plus shared overspill from Totnes to 5 immediately surrounding adjacent parishes
- C. New Housing based on equal share of growth plus shared overspill from Totnes to 15 surrounding parishes in Totnes cluster

Please find attached maps and data used in these assessments

Table 1 - Housing numbers – assessing the housing allocation for delivery in Dartington

Total Housing over 16 years (2015 – 2031) in SHDC based on estimated OAN Scenario for South Hams Thriving Towns and Villages	(A) Total New housing in Dartington by Household x 1.75 (x 1.86%- if using 2013 figs)	New Total Housing in Dartington by Population (x 2.11%)	(B) Plus possible Totnes 50% overspill on adjacent parishes: Total overspill into Dartington of 35.42% of Totnes allocation	(C) Plus possible Totnes 50% overspill on all cluster parishes (adjacent parishes + outer parishes): Total overspill into Dartington of 11.6% of Totnes allocation
8000	140 (148.80)	168.80	(+117.88) = 286.68	(+38.60 =) 207.40

Table 2 - Calculation used in table 1 above

Total Housing over 16 years (2015 – 2031) in SHDC based on estimated OAN Scenario for South Hams Thriving Towns and Villages	(A) Total New housing in Totnes by household (x 8.32%) (B) or 50% if shared out within cluster	(B) Total New Housing in adjacent parishes by population (x 4.94%) n.b. Dartington is 72.54% of this	(C) Total New Housing in cluster (adjacent parishes + outer parishes) by population (x 15.08%) n.b. Dartington is 17.19% of this
8000	665.60 (332.80)	395.20	1,206.40

(Continues)

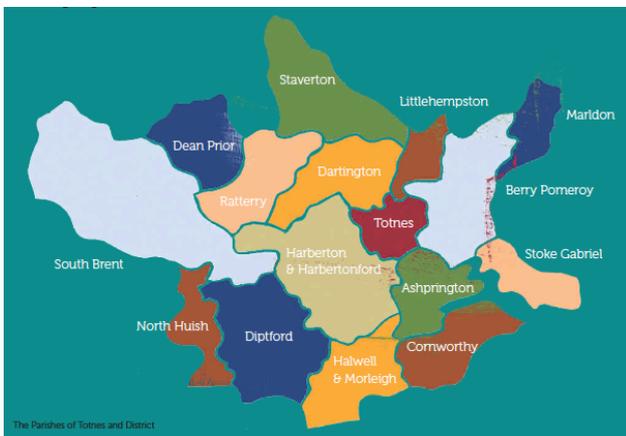
Housing Sites developed, commenced or planning granted in Dartington from 2014 are as follows:

Site	use	housing	(comment)
Brimhay Bungalows	Housing	12	(planning in progress)
Higher Tweed Mill	Mixed use	30	(currently being built)
Sawmills Field East (Origins)	Housing	65	(completed, <u>not in JLP</u>)
Webbers Yard	Mixed use	30	(part completed, <u>not in JLP</u>)
Land at Ashburton Rd (Meadowside)	Housing	50	(completed, listed as Totnes)
Transition Homes	Housing	27	(listed as Totnes)
			TOTAL 214 new homes underway

Housing Sites developed, commenced or planning granted in Totnes (excluding those in Dartington as listed) from 2014 are as follows:

Site:	use:	housing	(comment):
Land at Baltic Wharf (ph1)	housing	93	(part completed <u>90 in JLP</u>)
Land at Baltic Wharf	mixed	100	(under construction)
Atmos	mixed	99	(<u>62 in JLP</u>)
Riverside (Camomile Lawn)	mixed	106	(part completed <u>0 in JLP</u>)
Follaton Oak	Housing	60	(completed – <u>not in JLP</u>)
Great Court Farm (in Berry Pomeroy)	Housing	75	(under construction)
			TOTAL 533 new homes underway

Parish map of South Hams (source DCC)



Map of Totnes & District - 16 parishes (source Transition in Action; Totnes & District 2030 an Energy Descent Action Plan)



Map of Totnes & District (source Market & Coastal Towns Initiative 2001 assessment)

Numbers of households and population of parishes in South Hams based on 2011 statistics (from DCC and other sources)

http://www.devonics.info/sites/default/files/documents/Population%20estimates%20report%202008_0.pdf

Parish	Households	% of SH	Population	% of SHDC
Ashprington	184	0.43%	431	
Aveton Gifford	368		856	
Berry Pomeroy	459	1.07%	1017	
Bickleigh	1602		3960	
Bigbury	223		500	
Blackawton	301		739	
Brixton	783		1715	
Buckland Tout-Saints	98		173	
Charleton	294		504	
Chivelstone	217		280	
Churchstow	209		465	
Cornwood	483		1119	
Cornworthy	174	0.41%	342	
Dartington	749 (799 in 2013)	1.75% (1.86 '13)	1753	2.11%
Dartmouth	2635		5605	
Dean Prior	95	0.22%	201	
Diptford	217	0.51%	521	
Dittisham	293		434	
East Allington	363		727	
East Portlemouth	162 (housing type)		162	
Ermington	332		824	
Frogmore & Sherford	260 (housing type)		440	
Halwell & Moreleigh	215 (housing type)	0.50%	446	
Harberton	627	1.46%	1303	
Harford? No SHDC/census data	30 (No data – guesstimate)		77 (Wikipedia)	
Holbeton	265 (census)		619 (census)	
Holne	139		293	
Ivybridge	4859		11851	
Kingsbridge	2727 (tenure)		5887	
Kingston	172(tenure)		387	
Kingswear	827(tenure)		1217	
Littlehempston	97(tenure)	0.23%	226	
Loddiswell	484		921	
Marlborough	465		971	
Marldon	972 (housing type)	2.27%	2,123	
Modbury	745		1677	
Newton & Noss	853 (tenure)		1814	
North Huish	198 (H type)	0.46%	393	
Rattery	231 (H type)	0.54%	458	
Ringmore	152 (h type)		208	
Salcombe	1925 (h type)		1909	
Shaugh Prior	349		763	
Slapton	284 (h type)		434	
South Brent	1,299 (h type)	3.03%	2,822	
South Huish	223		473	
South Milton	175		385	
South Pool	71 (tenure)		143	
Sparkwell	553		1202	
Staverton	325	0.76%	805	
Stoke Fleming	577 (h type)		1019	
Stoke Gabriel	618 (h type)	1.44%	1,254	
Stokenham	1,150 (h type)		1,895	
Strete	294 (h type)		474	
Thurlestone	685 (h type)		863	
Totnes	3,563	8.32%	7,456	8.97%
Ugborough	754 (tenure)		1884	
Wembury	1439 (h type)		2740	
West Alvington	293 (h type)		536	
West Buckfastleigh	123 (h type)		301	
Woodleigh	91 (h type)		171	
Yealmpton	951 (h type)		2047	
TOTALS	40,301	(42,843 in 2013)	82,216	(83,100 2011 census)

