

In paper EXD9 and in light of revised housing trajectories the Inspectors asked for comments by 5pm on February 23rd.

On behalf of the Salcombe ND Plan Group:

Note to Inspectors

Re: TTV29.20 comprises Site SH_41_07_16 Shadycombe Car park (designated by SHDC in JLP documents as suitable for Housing) and Site DPD RA4 Ref SH_41_08_16 (which includes site SH_41_04_14) designated as Employment Use.

Context: JLP Policy Dev 8 and notably the importance in the policy of "Homes that redress an imbalance within the existing housing stock".

Salcombe has one of the most imbalanced stocks of housing in the entire UK: approx 50% of homes are 'second homes' and the average house price across the town is among the highest in the entire country. We are concerned that the current SHDC approach to planning in Salcombe is (i) not helping to redress that imbalance (ii) not consistent with the JLP submissions upon which we (and through a ND Plan survey, the wider community), commented in good faith in 2016/2017 and (iii) risking an erosion of confidence in the ND Plan and it's explicit support for delivering the affordable housing and employment unit expectations required by the community and as "promised" in the original Joint Local Plan. See 'evidence' below.

Evidence:

1. Site RA4 (SH_41_08_16) was designated by SHDC as suitable for 'employment use'. In your document CS3 dated Jan 2018 a supporting reference document dated March 2017 [Site Information Packs \(South Hams\) S-T \(HO4D\)](#) refers to a site SH_41_04_14 ("Former Gas Works site") within RA4 and clearly states that "this site is not considered suitable for residential use". This document does however now introduce the prospect of residential units above commercial units on the rest of the RA4 site.
2. We note that in April 2015 SHDC granted approval for 5 residential units on the SH_14_04_14 part of this RA4 site even though they later stated it was not considered suitable for residential use. In December 2016 the permission was increased to 6 dwellings.
3. There is currently an open application for a further 2 residential units on the adjacent plot within RA4.
4. Shadycombe Car park Site SH_41_07_16 was originally suggested as a single site capable of supporting 30 dwellings. Reference the 2016 JLP submissions on which the Salcombe NDP (and the wider community at a late 2016 survey) commented in the JLP Public Consultation. Qualified support (Consultee 1014876 ID 385) by Salcombe NDP was given in light of the expectation that at least 10 affordable units would be delivered on this one site. The site capacity has now been reduced in the recent Trajectories submission by SHDC to just 20 dwellings AND appears now to have

been merged with site RA4 (previously seen as suitable only for employment use)

5. SHDC now appear to argue (an email from SHDC sent to a District Councillor on 19th January 2018 - a copy of which can be made available if required) that 6 of the above 20 have now been approved (presumably the six residential units on the gas works site). All are 'open market', which in Salcombe means that they will probably become second homes. If the application mentioned in pt 3 above is approved that will leave just 12 dwellings to be developed. **Our concern is that further small scale applications may bring the outstanding balance below the threshold level at which one third of any development must be affordable, or that an economic viability argument will be used to explain that the site cannot support the expected number of affordable dwellings.**

Submission:

1. We would therefore respectfully submit that the Inspectors mandate that either:
 1. there be a revised assessment of the potential housing capacity across both sites but that this assessment be carried out in open consultation giving the community the opportunity to reinforce other aspirations (as expressed in ND Plan surveys) for the two sites - e.g. retention of the same number of car parking spaces, creation of employment units at rates affordable to existing local businesses ideally marine related etc etc
 2. the original 30 total dwellings be restored across these two, now merged, sites or
 3. if the 20 figure must remain, that 10 of these dwellings (or failing this at least 6) must be "affordable".

Summary & Conclusion:

1. It appears that there is a risk that the original 'promised' (certainly expected) yield of 'affordable' housing may not be delivered on this Council owned land. The merging and de-merging of these two sites could create a situation where future developments on either or both do not meet the threshold, of dwelling numbers, requiring one third to be "affordable" and that as a result a risk that the JLP will not be met and Salcombe's housing stock imbalance will be worsened.
2. An additional concern is that the Neighbourhood Plan process which has taken countless months of volunteer time over three years will be undermined in the eyes of the community at a time when we are pushing towards referendum (currently at Reg 14 consultation stage).
3. There may be an acceptable solution put forward by SHDC however we are not aware of any firm plans; it would seem an opportune time for the JLP examination to be the catalyst for a clear and enforceable solution acceptable to the community.

Sincerely

For Salcombe NDP Group