

Newton & Noss Parish Council

RESPONSE TO SHDC LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY

Submission Stage

10th March 2006

The Parish of Newton & Noss welcomes many of the revisions and improved drafting to the South Hams LDF Core Strategy Submission Stage (January 2006), especially the amendments to affordable housing. However, we continue to have strong reservations about the unequal distribution of resources between rural and urban areas, and consider the proposals for economic regeneration not to reflect the analysis in the supporting document “Employment Land Review, January 2006”.

As with our previous response, we hope our comments and suggestions will be taken in a constructive context. We recognise that South Hams is caught between the downward thrust of government/regional policy and the upward pressure, also encouraged by the Government, to respond to the “grass roots” representation of constituents’ needs.

Having conducted a proper Parish Plan and ongoing community consultations, our response is based on our analysis of the needs of our Parish.

David Miliband has recently emphasised the duty of parish councils to present and argue the case for their parishes. We note the work undertaken by SHDC to increase the proposed allocation of new homes in the District, which must have required some strong argument with Regional and Central Government.

Our response is divided into three sections namely: ongoing key strategic issues, detailed comments on each section and one or two minor suggested presentational improvements.

Newton & Noss Parish Council
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I) Overall Strategic Concerns

a) Disadvantage to Rural Areas

Our single biggest concern is that by its own admission, SHDC confirms that 66% of residents live outside the four main urban settlements, yet the thrust of the policies favours the towns over the rural parishes.

SO6 states “Regenerate the district’s towns, villages and hinterlands, and re-use existing buildings where appropriate.” SO13 states: “Retain existing and promote new local services, facilities and amenities”, whilst SO11 says “Reduce rural isolation.” SO10 aims to “Maintain and develop a prosperous countryside, encouraging sustainable development including rural regeneration and diversification.”

A close analysis of the document reveals that the vast majority of new housing, or proposals for economic growth, favour the urban over the rural. Our conclusions are further supported on page 59 (11) which states: “The opposite approach of scattering the provision to a large number of settlements across the district would potentially conflict with national strategic policy and advice which seeks to restrain development in rural areas. This concern is based on sustainability issues. Included amongst these are the pertinent issues of adequate services and facilities to support affordable housing and access/public transport.”

Further supporting our concern is the statement on page 58 (7) that the Council proposes to identify and support a few key settlements in favour of the whole district because “...this is most the most sustainable approach to development distribution. For this reason an unstructured, less focused approach is felt to be unsustainable and unsupportable.”

We cannot comprehend how a District Council with 66% of its residents in rural areas, can condone policies which further disadvantage the majority, especially as the policy is not supported by any tested objective evidence which has been put out to consultation, as far as we are aware. In fact, it may be a misinterpretation of Government advice.

We consider the statements on pages 58 and 59 detailed above to be wholly contradictory to SO10 which seeks to maintain and regenerate the countryside. They would also seem to be contrary to PPS1 (5) - HMG 2005 – which states: “- ensuring that development supports existing communities and contributes to the creation of safe, sustainable and liveable mixed communities with good access to jobs and key services for all members of the community.” The document goes on to state in 27 (ii): “Promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities.”

As a country parish council we have a duty to oppose any further attempts to disadvantage rural parishes over urban ones. We are disturbed that the District Council supports strategic objectives which have the potential further to disadvantage the majority of its residents, therefore failing to support existing communities and not promoting the maintenance of a proper social mix within them.

We wish to see a rebalancing of the Core Strategy to ensure a proper distribution of

resources to reflect the true balance of the District's residents and further to inhibit the vicious circle of the increased centralisation of key public services (e.g. schools and medical services), accompanied by a decline in the public provision for access to those services (e.g. public transport, digital communications and easy access to those centralised facilities – car park charging at hospitals when no viable public transport exists).

Without sufficient housing growth, particularly in the affordable sector, many rural parishes will become affluent ghettos, occupied mainly in the summer, with unsustainable services throughout the remainder of the year. This has been the fate of many Welsh and Pennine villages which have inhibited natural growth. This situation must not be allowed to develop further in the South Hams for parishes which are prepared to accept appropriate, modest expansion.

Rural regeneration to foster a proper social mix and to improve community well being, is a Government objective. As much attention and care needs to be paid to the sustainability and survival of rural parishes as is being given to the new community at Sherford.

Against this background, we do not consider that the following strategic objectives will be achieved: SO6 (regeneration of villages), SO13 (accessible services for villages), SO11 (rural isolation) and SO10 (maintain and regenerate the countryside). In this key respect the Core Strategy is fatally flawed and will damage the sustainability of existing rural parishes, rather than supporting them. Access to key services and the maintenance of a proper social mix will be further harmed.

b) Sustainability

"Sustainability" is a jargon word freely used in the document and by Central Government, yet it is without proper definition. In a strategic planning document where its technical definition may be different from its common usage, we believe its undefined use is not helpful in being explicit about the clear long-term detriment to rural parishes. Further, there would appear to be a cherry picking of the Government's unwieldy use of the word to support the Core Strategy's urban bias.

The term "sustainability" requires proper definition and explanation, given that it is used to justify so many strategic choices to rural disadvantage.

Historical development shows that many rural settlements have been far more sustainable than towns. As we move to a lighter, more virtual I.T. based economy where intellectual networked capital outweighs the power of physical capital, so the trend to increased urbanisation, where workers are located near to their factories and offices, may be slowed.

2) Affordable Housing

The problems of affordable housing are becoming increasingly acute across the District, whether rural or urban. There is an improved description of the situation and a better response to rural need. Also, there is a more even distribution of anticipated completion over the next decade. For rural areas, however, it is not enough.

The latest figures show that Devon's population is expected to rise above the national trend for the next decade, particularly in the Plymouth area. The distribution of new housing is unfairly biased against rural areas. SHDC's own evidence base points out that it "*.....is the preference of the higher skilled to live in rural areas adjacent to the large urban areas that provide the services they require.*" It is also policy to create higher skilled jobs in the District and that long-term economic growth has been about 2.1% p.a. above the national trend.

SHDC complains that its average house price is considerably higher than the national average, yet in our Parish our actual average price for 2005 is 50% above the average of South Hams and twice that of the national mean. Our cheapest properties sell for prices in excess of that mean.

Ignoring windfall sites for which there is no stated distribution, only 8.2% of new dwellings will be constructed in rural parishes, compared with 91.8% for urban areas. This planned distribution of resources and associated infrastructure is wholly out of balance with the distribution of the District's population of which only 33% live in urban areas.

The allocation of affordable housing between rural and urban is slightly better at 11% for parishes and 89% for towns, but it is still unacceptably low.

We consider the strategic argument to be weakened by the use of a district housing survey which is already 4 years out of date and regional housing requirements nearly a decade old.

Whilst the description of the housing problem is broadly fair, the underlying causes are largely ignored. The failure to use recent data hinders the proper analysis and subsequent development of long-term solutions. Strategy based on out of date data will damage the capacity of the District to maintain and regenerate itself.

For us the prime reason for the housing shortage is that demand is in excess of supply in the small to modest size dwellings sector of the market. This has been brought about by:

- i) The increase in population across the UK, accompanied by a drift South, particularly to SW Devon.
- ii) Despite an agricultural downturn, the continued better long-term economic growth of the South Hams over the remainder of the UK (7.5% p.a. vs 5.4% p.a.).
- iii) Smaller (but more numerous) family units.
- iv) A failure to release sufficient land for building – the UK is still largely rural in terms of its land use.
- v) Conversion of many smaller dwellings into larger ones – we do not believe this has been properly tracked by many district councils or the Government.
- vi) A continued desire by many people to move from urban to rural areas.
- vii) Holiday homes having the potential for greater tax benefits than primary homes.

viii) The South Hams continuing to be a popular place to live compared with other parts of Devon and the UK.

Acute housing shortage is an inhibitor of economic regeneration. Should such regeneration continue to be successful – which we all hope it will – then the housing problems will only become more acute!

The Core Strategy does not seem to anticipate the ongoing regeneration of the local economy in terms of the impact on housing or much of the associated infrastructure. Whether the economic regeneration is successful in the towns or villages, there will be an increased demand for housing in the villages for the reasons set out above.

Whilst we recognise the District has made some improvements to its affordable housing numbers which has involved some difficult negotiations with County and Regional Government, the fact remains that insufficient rural housing is planned. The gross inequality on new build in favour of urban over rural will only amplify the problems of affordability for many rural areas and will further drive them into becoming wealthy ghettos without a proper social mix. Even ignoring Sherford, the balance of new build is 34% rural and 66% urban, the reverse of the population base.

The Parish of Newton and Noss requires between 100 and 120 affordable homes over the next decade, not the 45 planned. SO6 (regeneration of villages), SO13 (accessible services for villages), SO10 (maintain and regenerate the countryside) and SO11 (rural isolation) will not be achieved with the current allocations. The gross imbalance of new housing in favour of the urban is wholly unjustified. Excluding Sherford, if the balance of new build were reversed, to reflect the true distribution of the District's population base, the situation would be improved considerably.

3) Employment

a) Employment Land

The distribution of the majority of industrial land is probably better suited to the urban rather than the rural, particularly where it adjoins major road and rail facilities. There is a strong economic argument that favours a symbiosis between similar businesses. However, the south of the District is distinctly disadvantaged with regard to good road access which is hampering its economic development and prosperity.

Some light industrial and commercial operations do not need to be near key transport routes and are better located near to their clients and origins. As we write, we have local businesses keen to grow within our Parish. This is organic growth brought about by their success. They provide local employment in the higher skilled and better paid trades. Several have outgrown their existing premises which are not inherently capable of expansion. Some of the business arises directly out of the large number of boats and yachts moored along the River Yealm and adjacent coast. Forced long distance relocation would remove them from their existing customer base and destroy local jobs.

Even though we have PDL (brownfield land) in the Parish which is wholly unsuited to agriculture, we are very concerned this has not been included in the Core Strategy as suitable mixed development land. Where parishes have local businesses which seek to expand locally, especially where PDL is available, they should be able to do so. A strategy which inhibits such organic growth does nothing to sustain and promote rural employment.

Inquiry by Design at Sherford and best practice across other parts of Europe, has shown that light commercial/industrial development can co-exist alongside or near to dwellings. This has been the traditional pattern of development of our towns and parishes since Roman times. Indeed, if properly planned, it can do much to promote "sustainability". Therefore, we support the use of PDL and would wish our medium sized PDL site to be included in the Core Strategy.

Newton and Noss has already identified to the planners a PDL site at Collaton which may be suitable for mixed development. We note the emphasis from Central Government that 50% of development should be on PDL. We are very concerned this has not been included in the Core Strategy, especially as we know of businesses which are keen to use it and are prepared to develop it themselves. Without its development there is a real risk we shall lose local indigenous employment. For this reason we do not consider that SO4 (promote mixed use housing), SO6 (regeneration of villages), SO7 (support of indigenous well paid growth), SO8 (secure high quality distinctive employment), SO10 (maintain and regenerate the countryside) will be achieved for our Parish.

b) Economic Growth is a top priority?

The Core Strategy refers to an evidence base document titled “Employment Land Review” which provides a moderately good analysis of employment in the District. Somehow the analysis and recommendations of this document do not seem to have been properly translated into the Core Strategy.

The Strategy notes the need to encourage rural enterprise and strengthen rural communities. A modest growth in manufacturing demand is observed – particularly in timber and furniture. PPS1 is paraphrased to recognise that economic development can deliver environmental and social benefits, and that rural regeneration can improve the well being of communities.

Given that the local economy is SHDC’s second most important priority, the seemingly light-weight treatment given to the subject in the Core Strategy is of some concern, particularly as there seems to be a strong bias in favour of the urban at the expense of the rural. If the same level of thought and analysis had been provided to this section as affordable housing or Sherford, one could make a considered response to the strategic proposals.

As it stands we do not see how many of the economic objectives of SHDC are to be achieved in either rural or urban areas through the Core Strategy.

Much of the underlying work has been done, but it has failed to be properly translated into the Core Strategy, particularly protection for rural businesses which supply sustainable services (post offices, cafes, shops etc.) and the capability for successful rural or marine enterprises to expand locally, near to their customer base and existing workforce.

We fail to see how the LDF will significantly help to improve the economic infrastructure throughout the District, particularly for the rural areas. Therefore, as it stands, we consider the Core Strategy inadequate in this respect, especially with regard to the south of the District.

Added value will be a key aspect of protecting agricultural businesses. Often this will require new facilities on site which may be not be capable of accommodation within exiting buildings. There needs to be recognition of this in the Core Strategy. Rural areas cannot be preserved in aspic to the detriment of their long term prosperity and “sustainability”.

4) Sherford

We note considerable attention and effort has been paid to the new development at Sherford. If the vitality of the whole District is to be ensured, in the interests of justice a similar level of resource and care needs to be devoted to protecting the futures of existing rural parishes.

Sherford will provide a wonderful opportunity to improve sustainable public transport to its hinterland to the south and east, thus improving rural access to key services and reducing the reliance on unsustainable private transport. This aspect is not properly addressed in the Core Strategy.

The remainder of our comments are confined to the anticipated impact on our Parish:-

a) **River Yealm**

The site of the new Sherford development lies within the catchment area of the River Yealm. This is a high quality river, supporting several SSSIs and a fishery. Nothing should be done at Sherford which disturbs the natural water flows into the Yealm, nor prejudice its quality.

With regard to the Sherford Development, the Core Strategy must insist on the protection of water quality and existing rates of flow in the River Yealm.

b) **Tourism**

The Parish of Newton & Noss is becoming an increasingly popular destination for tourists from near and far. Over the past decade our narrow roads have become busier and more congested with parked cars from visitors using the local walks, pubs and river for recreation. The problems associated with inappropriate and inconsiderate parking - and obstruction of narrow roads - have become acute. The situation is compounded by the absence of a public transport service on Sundays (for many still a day of leisure). We urgently require assistance from the District Council with regard to handling tourists and local walkers. It is essential we have improved facilities in place by the time Sherford begins occupation.

Part of the infrastructure proposals for Sherford must include leisure/tourism support to nearby attractive parishes which will be used by those residents, particularly in respect of parking facilities or significantly improved public transport.

c) **Public Transport, Hinterland and Area Centres**

Newton and Noss is presently served by one Area Centre - Ivybridge (mainly for schooling) - and one PUA – Plymouth (for schools, shops, key services and a main hospital). There is no direct public transport link to Ivybridge which particularly disadvantages our school children with regard to after-school activities. Similarly, the bus service to and from Plymouth is not timed properly to interface with commuters' needs, nor those of the many school children and adult learners attending Plymouth schools and the University. This does nothing to help passenger numbers.

As Sherford grows it will become a rival centre to Ivybridge and probably more convenient for many key services. It will also have fast, frequent public transport links to Plymouth City Centre. Visiting Derriford Hospital by public transport on a regular basis is very difficult as there is no direct link from the A379. Hopefully a link from Sherford will help to alleviate the problems of constituents along the A379.

Sherford has absorbed a considerable amount of SHDC's planning effort to the detriment of rural parts of the District. An urgent re-balancing of effort is required to protect the future of rural parishes.

We note the work promised to be undertaken with regard to the effective public transport interface between Plymouth and South Hams from Sherford to key City facilities. Specific mention must be made as to how Sherford will use its public transport hubs to improve services to its new hinterland, particularly to the south and east of the District. This will help to support the growth of Sherford and tackle key "sustainability" issues.

The timing of the introduction of service changes is also vital in order to ameliorate the increased congestion along the A379 associated with the early occupation of Sherford.

The recent threat to rail services serving Ivybridge is not a good omen for the future of public transport in the South Hams. It is all very well for the authorities to have a policy of making car use increasingly difficult on the grounds of "sustainability", but to cut public transport provision at the same time damages the credibility of policy makers.

d) Land Windfall Tax

Although not of direct significant concern to the Parish, we note the Government's recent discussion document on a new land windfall tax and the proposal to exclude many planning gains – especially infrastructure – from development negotiations. We are surprised no mention of this is made as the new proposals are likely to be in force during the early development of Sherford. They will also impact on significant developments throughout the life of the Core Strategy.

5) Climate Change

- a) The Core Strategy refers readers to the SHDC document “Strategic Flood Risk Assessment”. Whilst the responsibilities for flooding and coastal erosion are discussed, there is no mention of an ongoing rise in sea levels, due to the continued melting of the polar ice caps, nor the increasing risk of ever rising surge tides or seiches. The thrust of the document is aimed at SHDC’s responsibilities for drainage and a few sea defences. The absence of reference to sea level rise is surprising as this is referred to explicitly in PPSI (20) published by HMG in 2005.

We are not arguing that the District should attempt to protect itself against the anticipated sea level rise over the next 50 years, but some estimate of the impact in the next decade should be made to ensure developments – which could last a century or more - are not adversely affected by long-term polar melt.

Taking account of sea levels as early as possible should help to minimise the long-term disruption – and costs that inevitably will arise. Towns and villages with proposals for development on land less than 10 metres above sea level will need very careful consideration with regard to the risk of permanent flooding and the difficulty of achieving adequate drainage.

Similarly, the District should have some idea in any strategic planning document of the effect global sea level rise will have on its existing infrastructure, so the effects can be mitigated wherever practicable.

An impact assessment on the effect of anticipated sea level rise of 6 to 10 metres in the next 50 years is required to ensure developments undertaken in the next decade are not adversely affected in the long-term, and to maximise the opportunities to protect the existing infrastructure.

- b) **More emphasis/thought needs to be given to fossil carbon energy substitution by local energy crops – which may provide a source of local economic growth/regeneration. Energy reduction/conservation is only part of a practical answer.**

6) Minor drafting observations

- a) Table 2, page 27: No units associated with the numbers; presumably hectares.
- b) 6.29, page 46: It is more scientifically correct to state that long term climate changes are probably due largely to the emission of greenhouse gases (unless SHDC has better evidence than the UK Government!)

Conclusion

The Parish Council welcomes the increased number of affordable homes to be built in the District but fears there will be insufficient to satisfy the needs of local people and ensure the maintenance of mixed communities.

The wishes of the local community have not been given appropriate priority. The results of a thorough and fully representative parish-wide questionnaire – as part of the Newton & Noss Parish Plan process – produced a mandate that locally more affordable housing must be provided and, if necessary, the village boundary should be expanded to accommodate the provision.

The Parish requires at least 100 affordable homes over the next decade.

Despite our suggestion, we are concerned that PDL (previously developed land) in our Parish has not been allocated for a mixed development to address the needs of our successful local businesses and much needed housing.

Sherford must be used as an opportunity to support the sustainable public transport infrastructure of its new hinterland to the south and east.

With regard to rural areas, we do not consider the LDF will adequately achieve the Strategic Objectives, in terms of:-

- a) Regeneration**
- b) Access to services**
- c) Sustaining employment**
- d) Improving economic infrastructure**
- e) Reducing rural isolation**
- f) Retaining and promoting new local services, facilities and amenities**

Given that 66% of SHDC's population live in rural areas, the imbalance of projected resource in favour of the urban minority is unsatisfactory, as it will only further harm the viability and "sustainability" of many villages in the South Hams. As much attention should be paid to the well-being of the whole District as has been devoted to Sherford.