

**Newton and Noss Parish Council**

**Response to LDF Consultation**

August 2005.

**1. Statement of Community Involvement – Submission Stage**

- a. Newton & Noss Parish Council supports the SCI with the following observations and one objection.
  - i. 5.7 The Market and Coastal Towns Initiative (MCti) for Ivybridge does not embrace or represent its rural hinterland due to chronic process failure throughout the Ivybridge MCti project.
  - ii. 6.7 The specific mention of Parish and Town for involvement in the development of LDFs is welcome, and is far stronger in commitment than in previous versions.
  - iii. Sections 5 and 6 - Whilst clear to the authors, the difference between consultation and involvement is not properly stated or defined.

## 2. Core Strategy – Preferred Options Stage

- a. Newton & Noss Parish Council recognises the amount of work that has gone into the preparation of the Core Strategy, but fears that as it stands it will NOT deliver SHDC's strategic objectives, referred to throughout the document.

This comment is not meant to be negative because the Strategic Objectives are welcome; it is just that in the way the Core Strategy is currently drafted, there is little way of telling how it will assist SHDC in practically realising its objectives. This is not a party political point, (party politics is not the business of our Parish Council) it is an organisational issue concerning the use of the document.

- b. For the reasons set out in 2a) our comments will not refer to detailed criticisms of each page since we feel it would be more constructive to set out our headline problems with the whole document. These comments might assist in the overall re-drafting of the document which we think is necessary.
- c. Before we set out how we think the document could be improved, we believe it may be helpful for us to state what we understand to be the key issues facing SHDC electors. This may help to illuminate why we have made such high level strategic criticisms of the core strategy -

### Issues

- i. About 40% of electors live in urban centres with the remaining 60% in rural areas.
- ii. The South Hams area has some of the highest average cost housing in the UK, with one of the lowest household average incomes (72% below national average).
- iii. The Gross Domestic Product (GDP) of the District is 78% of the EU average (before enlargement?), and is (was?) eligible for Objective 2 support.

- iv. Most employment is from lower paid tourism and public sector employers. In the private sector there are only a few large firms and many smaller rural based businesses, such as farming and fishing, have been (and are likely to continue to be) in long term decline.
- v. Between now and 2010 the population is expected to rise from 82,000 to 90,000, much of this population rise being in the south west of the District.
- vi. Low cost decent housing for rent or purchase, for people on average or below average earnings, is in short supply. This is to the detriment of much of the indigenous population and inhibits employers from addressing skills shortages by raising a significant barrier to the recruitment, because potential employees cannot afford to live here. A rise in population will only make matters worse.
- vii. Many parts of the South Hams consist of Areas of Outstanding Natural Beauty, or rural and marine landscapes of significant value. This is a benefit and a weakness as it is too easy to use as an excuse to restrict proper development, particularly in rural villages.
- viii. Many small villages lack essential facilities such as a shop, school or post office. A perversity of the current economic climate, and lack of housing in small villages and towns, is that homes, which absorb money, have a significantly higher capital value than business premises which generate money. It is not surprising therefore that there is constant pressure on commercial properties – often providing essential facilities to rural communities – to be converted into residential housing.
- ix. The average level of second homes across the District is about 11%, but this masks the fact that many “pretty” riverside towns and parishes have second home numbers which rise to 40% and 55%. Currently the situation is believed to be deteriorating. Whilst some levels of tourism boost the profits of small shops and pubs as tourists tend to spend more than locals, once above about 20% the backbone of the community starts to decline. The number of children required to support a school goes down, shops don't cover their operating costs out of season and local clubs and societies fold.
- x. Similarly the forthcoming changes to pension provision, where personal pension trusts can invest in non-commercial property with significant personal tax advantages, is unlikely to lessen the demand for private houses in the South Hams.

This measure might increase the availability of privately rented houses, but these will be at full market rents.

- xi. Over the past year or so, “second homes” have been subject to almost full Council Tax charges. In the short-term this unexpected revenue was wholly diverted into the provision of more affordable housing. However, this year a significant proportion of the tax has been “diverted” to day-to-day running costs of all council services. In the short-term the increase in taxation on second homes can be seen to benefit the local community. Over the long run it may act as perverse incentive to Councils to allow rural communities to fail because areas with high levels of second home ownership make fewer demands on local services (from schools to refuse), yet the taxable income remains the same. Therefore, from a council’s perspective, a larger tax base with lower costs of service provision may have a damaging effect on long-term policy. A constant tax base with fewer residents could be a politician’s dream!
- xii. Rural isolation affects a variety of communities in different ways. 25% of wards are in the most deprived group in England, with regard to access to services (e.g. schools, medical facilities, essential shops, effective public transport and youth services.) One third of Parishes have no daily bus service and many existing routes do not match up to the needs of communities. As central and local government concentrates service provision into fewer and larger facilities, access to them becomes increasingly difficult for many sectors of the rural community – whether by public or private transport.

For example, Derriford Hospital is the major health facility for the south western part of the South Hams, replacing a variety of old hospitals in the centre of Plymouth. The site is based on the northern outskirts of the city, but there are no practicable public transport solutions for many residents in the hinterland, thus increasing their dependency on private transport. Those who are too ill or poor to have access to such facilities are further disadvantaged. The isolation is compounded by excessive parking charges at the hospital, further penalising rural patients and their visitors.

A similar situation arises with regard to secondary and further education. Rural students, many of whom are too young or poor to have their own transport, are unable to access appropriate further education or out-of-hours school activities because of inadequate transport provision to educational centres. (e.g. Ivybridge Community College)

- xiii. On average, rural populations are ageing, partially due to the lack of affordable housing and suitable employment opportunities. Older people are often trapped in housing with a large capital value which they can only release by leaving

their parishes, due to the lack of suitable smaller properties available for “downsizing”. This disrupts their social and support networks and, in the long run, increases the burden on social services.

- xiv. Devon County Council produced a Structure Plan in the mid-nineties (a decade ago) which failed adequately to recognise the future problems of affordable housing and primarily addressed the needs of urban rather than rural areas. Given that the majority of Devon’s population live in rural communities, this represents a significant strategic weakness in the document.
- xv. The proposed Sherford community has resulted in a significant resources burden on SHDC and has detracted from the authority’s ability to deliver a balanced strategic approach across the whole of its District, particularly in the south western areas.
- xvi. A significant proportion of communities in the South Hams are housed close to sea level. Global warming – however caused – will lead to a gradual rise in sea levels which will impact on waterside properties, communities and associated infrastructure.

d. Key observations on the document.

- i. Policy measurements affect outcomes, and unless something is properly defined and appropriately measured, desired outcomes are unlikely to be achieved. The document is littered with desirable strategic objectives, but very few of the objectives are supported by measurable outcomes. The policies are listed as follows:

- SO1 – Provide affordable housing to meet the needs of local people;
- SO2 – Meet the strategic requirements for housing;
- SO3 – Secure high quality, locally distinctive, sustainable housing developments;
- SO4 – Promote mixed use, mixed type, mixed tenure schemes;
- SO5 - Provide for housing at the highest densities suitable for the site;
- SO6 - Regenerate the District's towns, villages and their hinterlands;
- SO7 - Provide for business growth and development providing year round sustainable, well-paid employment;
- SO8 - Improve the District's economic infrastructure;
- SO9 - Retain and develop a prosperous working countryside;
- SO10 - Reduce rural isolation;
- SO11 - Support the role of market towns, especially the town centres and other local centres;
- SO12 - Retain existing and promote new local services and facilities;
- SO13 - Promote development at locations accessible by sustainable transport;
- SO14 - Conserve and enhance the quality of the District's countryside and coastal landscapes;
- SO15 - Conserve and enhance the diversity of wildlife habitats and species;
- SO16 - Conserve and enhance the historic and archaeological features of the District;
- SO17 - Provide for recreational use and enjoyment of the District's towns, villages, countryside and coast;
- SO18 - Achieve development, which is of a high quality, respects its location and is compatible with the sustainable management of land, soil and water.

Consider SO6 for example; how will SHDC know whether it has been achieved without a definition of regeneration or a portfolio of measures to determine success or failure? In SO10 what is meant by "reduce rural isolation"? How does the Core Strategy help to deliver that objective and how will anyone know if it has been achieved? These two illustrations indicate the problem of objectives without measurable outcomes. The Core Strategy as currently drafted wallows in ideals

but has very few measures of effective delivery. It states that measures will subsequently be developed, but unless those measures are an integral part of the document it will not know if the proposed policies are capable of meeting the Strategic Objectives in the first place.

P40 states *“It may be some time before the Core Strategy begins to have tangible benefits within the District that can be measured.”* Unless those measures are determined prior to the commencement of the Core Strategy, there is a real risk that the policy objectives will not be achieved, resulting in strategic failure.

- ii. There is little evidence of how Parish & Town Plans have been assimilated into the Core Strategy; therefore the document cannot be considered to have met the tests of proper community involvement.
- iii. The document is primarily urban focused, representing only 40% of inhabitants. Although the problems of rural areas are implied in Strategic Objectives, there are few detailed policies as to how these objectives will be met for rural areas. For this reason the document is exclusive of the majority of the residents of South Hams. The concentration of proposed “sustainable” development will be on a few Area/Local Centres. This implies that in the long term other settlements will not be supported, thus hindering their sustainability, regeneration and increasing rural isolation, contrary to SO6, SO10 and SO12. This conclusion is supported in the last sentence of paragraph 7 page 44 which states *“For this reason an unstructured, less focused approach is felt to be unsustainable and unsupportable.”* Policies need to be developed which help to sustain and support the majority of South Hams’ residents, and not just an urban minority.
- iv. At a strategic level the Core Strategy should not constrain SHDC’s ability to meet the affordable housing requirements of local people. The document recognises the problems facing the District with regard to affordable housing (SO1), but fails to show how it will deliver the required number of dwellings in a sufficient time-frame to appropriate localities. SHDC has identified that 330 affordable homes are required per annum over the next decade. At best Sherford will deliver about 650 of these dwellings, but for many they will not be local and the majority of completions will be in the next decade. How then will the current affordable housing need for local people be addressed? Where will the residual 2,650 affordable dwellings be built and how will SHDC deliver 1,000 of them over the next 3 years? Many settlements have between 20% and 50% of second homes, if sustainability is to be maintained or improved, affordable housing provision should attempt to match the level of second home occupation by a stated proportion.



- v. Paragraph 6.24 is helpful with regard to the practical provision of affordable housing.
  - vi. So little emphasis is given to the economy that it is doubtful whether the Core Strategy will have any measurable outcome and thus fail to meet objectives SO6, 7, 8 and 9. This is a very serious omission and an inadequate response to the needs of the District.
  - vii. Paragraph 4.11 identifies the economic problem but the document fails to allow for sufficient sites in Parishes to enable the organic growth of existing small successful businesses which do not which to leave their existing localities. The local leisure marine industry is a prime example. The shortage of affordable housing further compounds a skill shortage, which inhibits economic regeneration and sustainability. In considering higher paid employment, more work needs to be done with Plymouth University in providing the facilities to allow for the start-up of small high-tech businesses, and the problems of further farming decline need to be addressed.
  - viii. Paragraphs 4.16 and 4.17 talk about rural isolation and sustainable transport. In reality the problems in rural areas are worsening (see c xii) and for many in the hilly South Hams cycling is not a feasible or safe option. The document fails to state how it aims to address accessibility problems for the majority of its rural population in any measurably deliverable way. It seems to foster urban sustainability at the expense of rural.
  - ix. The needs of young people in rural areas are not adequately addressed in terms of access to education and recreational facilities.
  - x. Additional tax revenues from second homes should be “ring-fenced” to support the sustainability of existing communities.
- e. In summary, therefore, the Core Strategy fails to deliver the Strategic Objectives in significantly measurable ways, particularly with regard to affordable housing, the economy, access to services and rural isolation. It is urban centric and fosters the growth of larger centres to the detriment of smaller ones, further worsening the position of those in rural areas. It is over reliant on the out dated Devon Structure Plan, which failed to address the problems of rural areas. There is an over emphasis on Sherford at the expense of the whole District and the problems of forthcoming rising sea levels are ignored. If the same emphasis on sustainability and access to services were to be applied to all parishes of over 1,500 residents, as are to be applied to Sherford, then the Core Strategy document would be far more meaningful and effective.

3. **Sherford New Community Action Plan** – Preferred Options Stage.

- a. The commitment in paragraph 4.17 to protect the water quality in the Yealm Estuary is welcomed, but does this include the rate of water flow? Will urban development make the river more liable to sudden surges of flow in times of heavy rain, and remove the natural farmland reservoir to sustain it in periods of drier weather?
- b. Sherford provides an opportunity to act as a catalyst for the development of local companies to assist in the delivery of renewable energy and water solutions to the South West.
- c. Paragraphs 8.12 and 8.14 mention park & ride facilities along the A379, but no firm proposals are put forward. Sherford provides an opportunity to address the public transport accessibility problems for many parishes along the A379. In considering future public transport provision, plans must incorporate better public transport services to the south and east of Sherford.
- d. A rise in local population is bound to increase the number of regular visitors to surrounding attractive Parishes. With no concrete proposals to improve public transport services to these locations, particularly at weekends and in the evenings, the pressure on existing parking facilities will increase. In Newton & Noss these are currently inadequate and at peak times some roads are impassable which is hazardous to residents, particularly with regard to emergency service access. Sherford will be of overall benefit to the District Council in terms of revenue. In the ongoing absence of effective public transport solutions, some of that revenue must be used to increase visitor parking capacity in surrounding Parishes.