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Panel Secretary
South West RSS Examination in Public
2 Rivergate
Temple Quay
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Dear Sir/Madam

**Draft Regional Spatial Strategy for the South West 2006 – 2026 (RSS) Submission Stage.
Consultation Response**

DSHG is a strategic partnership working to improve the delivery of housing in Devon. DSHG comprises representatives of all the Devon Housing Authorities including the Unitary, District and County (see appendix one for a list of LA partners), Registered Social Landlords, the Housing Corporation, and a representative from the Government Office for the South West.

Overall DSHG welcomes the attempt to mainstream rural issues but remains concerned that that impact of policies may be adverse and so would request that the document is rural proofed. This coincides with the recommendation in the Affordable Rural Housing Commission's Final Report (see recommendations on pages 26 and 27 of that Final Report) that 'the Examinations in Public Panel for draft RSS be asked to advise the Secretary of State whether rural housing needs have been addressed'.

DSHG also welcomes the recognition that the provision of affordable housing is essential to the economic prosperity of the South West.

This response attempts to bring together the perspectives across Devon including large Unitaries and smaller rural districts. This response focuses on affordable housing and the key areas that DSHG would wish to see addressed, although not in any particular priority order.

1. The 30-60% Affordable Housing (AH) Target. H1.

The 30-60% target is a very wide target. If it is more of an exhortation to maximise opportunities for Affordable Housing with the expectation that a minimum of 30% would be sought, then this needs to be made clear in the policy and a numerical target for monitoring purposes contained in the implementation plan.

The implementation plan refers to a minimum of 7,500 affordable homes per annum being delivered. As a percentage of the total housing allocation in the RSS this is a figure just in the low thirties for affordable housing, which is at odds with the aspirational target of 30% - 60%. Given the Affordable Housing problem in the SW the regional [numerical] target should be more aspirational. This needs to be tempered against the reality that investment is not expected to rise significantly and there is increasing emphasis on the planning system to provide more affordable housing.

It would also be helpful for RSS to reference the need for Affordable Housing and the role it plays in both urban regeneration and in sustainable rural communities. At present this is not explicitly drawn out as the focus is on delivery mechanisms and planning thresholds. It would therefore be useful for the aspirational regional target in the implementation plan to be divided between the strategically significant cities and towns and the remainder of the region. Also, cross reference to the current rural targets and the need to maintain and enhance supply in the rural areas could be usefully included - especially in those areas highlighted for rural renaissance [page 194]. There's currently little read across between these issues.

Given the increasing emphasis on the planning system to provide affordable housing greater understanding is needed of the outcomes of individual scheme viability assessments. With such high percentages a large proportion of shared ownership, or other forms of low cost home ownership are inevitable. Greater understanding and more research is needed about the affordability of the range of low cost home ownership products in order to ensure that the 'affordable housing' supplied meets real need, the total rent and mortgage payments are truly affordable and is not adversely affected by the higher percentages of affordable housing required. In other words we understand better the complexities of the choice between a high percentage of houses at lower discounts (making them less affordable) against a lower percentage of affordable houses which are truly affordable as a result of deeper discounts.

2. Sustainability (Policy SD4). Development Policy C. Development in Small Towns and Villages.

The ARHC Final Report makes much reference to sustainability appraisals on pages 24 and 25 and DSHG is supportive of, and would call for, greater consideration of the recommendations reflected in the RSS.

The policy could be more visionary encouraging a more pro-active approach to making the smaller towns and villages more sustainable in the longer term and developing strategies to minimise their environmental footprint. For example, policies on transport and renewable energy could be brought together at the level of small towns and villages in a pro-active plan to improve the sustainability of smaller communities rather than judging them to be sustainable or unsustainable at a single point in time and therefore not justifying further housing.

3. Analysis of Sub-Regional Housing Markets.

The Analysis of Sub-regional Housing Markets in the South West by DTZ Pidea Consulting, July 2004 was used to inform the development of the Draft RSS. It is therefore crucial that the RSS includes feedback from both the three pilot Housing Market Assessments and those other HMAs where significant progress has been made e.g. Plymouth and Exeter. It is particularly important to test the assumptions made by DTZ in the identification of the Housing Markets and how the larger settlements relate to their rural hinterland.

The recent Affordable Rural Housing Commission report set out recommended targets for meeting rural housing need (see page 18 of the ARHC Final Report). If applied to Devon the recommended targets set out for the 136 rural wards in Devon would exceed the allocation proposed by the RSS. Further work is required in order to consider the rural allocations in light of the AHRC recommendations and the datasets used in that report.

4. LDF Policy

The RSS provides the policy framework for the Local Development Frameworks. However, LDFs in Devon are at very different stages of development. It is critical that LDF policy is sufficiently flexible to incorporate findings from the Devon Housing Market Assessments and any changes in policy determined by the pending PPS3 requirements.

The RSS should contain an expectation that thresholds will be driven down - below the 15 dwellings in draft PSS3 if justified by severe affordability issues [and here the RSS could cross reference the affordability map]. There is a figure being quoted by the Housing Corporation that 50% of all new dwellings are on sites below the 15 dwelling threshold. Again this is echoed by the ARHC on page 28 of their Final Report which calls for 'Local Planning Authorities to... actively pursue lower thresholds and more ambitious quotas for affordable housing'

It would also be useful if RSS picked up on the Affordable Rural Housing Commission Final Report recommendation (page 21) that Local Planning Authorities should not rely on exceptions sites alone - but should justify allocating housing sites of an appropriate scale in rural areas. Both allocated sites and exception sites have a role. Allocated sites can bring the additional benefit of cross subsidy and enable tenancy allocations policies to be more sophisticated reflecting both immediate community need and the need from across the Districts. The potential disadvantage of allocated sites is controlling the hope value.

5. Making Best use of Existing Stock

No reference is made in the RSS to the importance of maximising use of existing housing stock and it would be helpful to make reference to this and flag up clear linkages with work in this area in both the Regional and Local Housing Strategies. For example work on empty homes and Decent Homes Standards in the private rented sector.

There is also some concern at the number of smaller, lower cost houses becoming unaffordable to those on low incomes as a result of planning permission for their extension and improvement. The proportion of dwelling stock in the lower quartile of affordability tends to be smaller in rural areas, and loss of entry level housing could be addressed in LDF policy that limited the extension and redevelopment of existing dwellings to particular circumstances. More explicit reference to this in RSS would be helpful.

6. Densities H2 (and Development Policies F &G) and High Quality Design (Development Policy E)

Policy F has an ambitious approach to densities. Clearer referencing to work that examines the impact of higher densities on the quality of design, particularly in rural areas, and an understanding of the quality of the living experience in higher densities is needed. For example, a small practical point is the often inadequate sound insulation on such high density developments which, if rented, can lead to higher tenancy turn-over and can make them difficult to manage (consistency with SD3 aspiration to 'maintain tranquillity' is needed and Policy G could make explicit reference to sound insulation requirements above current Building Regulations standards in order to promote the social sustainability of such densities). Good practice in design at higher densities, that has good local fit needs to be identified. In other words the ramifications of this policy on living experiences need to be properly understood, particularly if densities in urban areas exceed 50 dph. It would be more appropriate for the policy wording to refer to LDDs testing the density targets in the context of local design and distinctiveness, than to refer to them "reflecting" the targets.

7. Development policies B & C [pp37-38].

These 2 policies currently cover a huge range of settlement types and sizes. Under policy C clarity is required over the degree to which the focus of development will be on affordable housing. If the 30-60% target is retained then RSS policy could usefully say there would be an expectation that the higher end would apply in development policy C settlements where open market allocations were deemed appropriate.

8. Other Comments

8.1 Housing Market Areas (HMA).

It would be helpful if this section referred to liaison across HMA boundaries and also to the requirement for HMAs to coordinate and achieve complementarity on the data and information collection and monitoring systems to facilitate monitoring and ongoing market related studies.

8.2 Affordable Housing

The section on affordable housing could be stronger in its reference to the role of affordable housing in building communities - and make links with design and delivery

Yours sincerely

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