

SDLP03.4.



South Downs National Park Authority

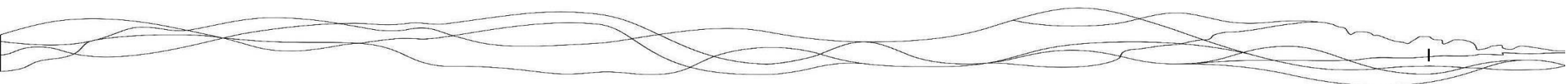
South Downs Local Plan

NPA Responses by policy and site

Revised Appendix 4 of the Submission Consultation Statement

In response to Inspector Note INSP.2A

August 2018



South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD28 Affordable homes

There were a total of 66 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Generally support approach although in practice it is difficult to secure onsite units on sites where only one or two affordable units are to be provided. Specific changes to policy requested: lower threshold should be 4 not 3 dwellings on a site; include further guidance on levels of integration, and state that policy may not be circumvented by under-delivery of housing. (Chichester District Council) • Part 1(b) should signpost to paragraphs 7.72 and 7.73 to explain ‘meaningful financial contribution’. Correct inconsistencies in parts 1 and 2 re lower thresholds in policies for on-site financial contributions. Amend 7.67 to state that all viability appraisals should be independently at the applicant’s expense. (East Hampshire District Council) • Object to part 4 of the policy which appears to exclude local housing authorities and registered providers, who are likely to be the main agents of delivery, from involvement in occupancy conditions and local connections criteria. Policy should refer to these, plus housing associations and HARAH. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Welcome/support policy. (Cheriton PC, Liss PC, Petersfield TC, Slindon PC, Steyning PC, Buriton PC) 	<p><i>I: In practice it is difficult to secure onsite units on sites where only one or two affordable units are to be provided.</i> R: The SDNPA considers it is important to explore every opportunity to deliver affordable homes on-site, given that many small settlements are often reliant on just one or two small allocation sites (or potential windfall sites) that are suitable for development. Therefore a higher threshold would severely limit or remove any chance of securing affordable homes for that settlement. The SDNPA understands there is support for successfully delivering these small schemes from some registered providers. Paragraph 7.71 allows the exceptional use of financial contributions where on-site provision is demonstrably not feasible.</p> <p><i>I: There should be a lower threshold of 4 not 3 dwellings</i> R: The three dwelling lower threshold has been shown in the Whole Plan Viability Study (Core 13) to be viable with financial contributions for affordable housing. On-site provision is only required on sites of 4 or more dwellings.</p> <p><i>I: The Local Plan should state that the policy may not be circumvented by under-delivery of housing.</i> R: Part 5 of Policy SD28 makes this requirement clear.</p> <p><i>I: Correct inconsistencies in parts 1 and 2 re lower thresholds in policies for on-site financial contributions.</i> R: SDNPA accepts that there remains an inconsistency in the policy wording, It is recommended that this is addressed through a minor modification on page 15 within the Pre-Submission Schedule of Changes.</p>

Policy SD28 Affordable homes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Welcome policy but would like it strengthened to ensure affordable housing is pepperpotted throughout the development and is tenure-blind. (Easebourne PC) • Support policy, but consider it is not always desirable or economically viable to combine market and affordable housing on a single site. (Hawkley PC) • There is a concern about part 3 including ‘where feasible’ as it is too lenient / the emphasis should be on the party wishing to take the property out of being an affordable home. (Lavant PC, Selborne PC) • Re 7.58: concern over last sentence re exceptional viability constraints, which is an easy get-out clause for developers. (Selborne PC) • Regarding 7.62, there is experience of applying cascade of local connections is frustrated due to adjoining parishes falling under different district councils. Unclear on approach to CIL where affordable housing is to be provided off-site. Note that managing just 2 affordable homes on a 6 home development might be difficult. (Amberley PC) • Concern re how SDNPA will identify what is a genuinely affordable rent. (Elsted & Treyford PC) • The affordable housing mix is too high and a disincentive to any development. (Fernhurst PC) • Requirement that affordable housing should take preference over all other requirements is a decision that should be based on local circumstances. Policy should refer to ‘except as provided for by development briefs or allocations in neighbourhood plans, or as justified by local circumstances.’ (Twyford PC) • There is a need for larger family homes in West Meon as it is strategically important to support existing families and this should be a consideration for the housing mix of the site. (West Meon PC) 	<p>I: Amend 7.67 to state that all viability appraisals should be independently prepared at the applicant’s expense. R: It is considered that the text as drafted already makes this clear.</p> <p>I: Policy SD28 (4) appears to exclude local housing authorities and registered providers, who are likely to be the main agents of delivery, from involvement in occupancy conditions and local connections criteria. Policy should refer to these. There is too much emphasis on Community Land Trusts (CLTs) (few in existence; difficult to administer). R: Paragraph 7.63 clarifies that the local housing authority will be involved where appropriate in determining local connection criteria. It is unnecessary and potentially confusing to provide a full list of potential consultees, given the housing authority will provide the lead on such matters where there is no CLT or other local framework in place. Whilst CLTs are strongly encouraged, there is nothing in the Local Plan that suggests the SDNPA will not equally work with other bodies to ensure appropriate sites are delivered – this is in any case happening in practice.</p> <p>I: Policy should be strengthened to ensure affordable housing is pepperpotted throughout the development and is tenure-blind. R: Policy SD28(3) makes this requirement clear.</p> <p>I: It is not always desirable or economically viable to combine market and affordable housing on a single site. R: A key aim of the Local Plan is to ensure community integration as part of achieving thriving, successful communities. However, Policy SD28 and supporting text provides some flexibility (for example financial contributions in lieu of on-site provision) where it is demonstrably not feasible to provide both on one site.</p>

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Summary of Issues and Responses

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<ul style="list-style-type: none"> Concern over emphasis on the word ‘affordable’. Support level of affordable housing. (Lewes TC) <p>Other organisations</p> <ul style="list-style-type: none"> Support policy reflecting that affordable housing to meet local needs is crucial, and reflecting evidence in the HEDNA/SHMA. One respondent welcomed policy in respect of supporting younger generations to remain in the locality. (various organisations) Policy (sliding scale of affordable housing requirement) does not reflect the Written Ministerial Statement (WMS) made by the Minister Brandon Lewis MP on 28 November 2014, also reflected in Planning Practice Guidance (PPG) Paragraph 031 Ref ID: 23b-031-20161116. This sets thresholds of 10 units or less or 1,000 sqm or less for seeking on-site affordable housing, and of 5 units or less in National Parks / Designated Rural Areas for seeking commuted sums. PPG does not make an exception argument to be made based on a specific need within the local authority area. The Government’s approach reflects that small developers have tighter cashflow / lower viability margins and will otherwise be disincentivised to build houses to meet the housing need. (various organisations) A target of 50% affordable housing on sites of 11 or more may prevent the delivery of homes, which does not reflect the objective set out in NPPF paragraph 47 to assist the delivery of much needed affordable homes in the National Park. One respondent expressed surprise that a minimum 50% is sought given the previous viability study prepared by Dixon Searle LLP recommended a maximum 40% level be sought on sites of 10 units or more. Others considered this level would, on basis of viability evidence, put the Plan’s delivery at risk, particularly in medium- to low-value settlements. (various organisations) 50% affordable housing is not considered achievable on previously developed land (PDL), which is a site typology not tested by BNP 	<p>I: The phrase ‘where feasible’ in SD28 (3) relating to affordable housing in perpetuity, is too lenient. R: The wording is necessary given the ‘Right to Buy’ legislation from which there are only some exemptions.</p> <p>I: Concern over last sentence of 7.58 re exceptional viability constraints, which is an easy get-out clause for developers. R: The supporting text reflects the NPPF with regards the importance of viability constraints not unduly holding up development.</p> <p>I: Applying a local connections cascade [7.62] is frustrated due to adjoining parishes falling under different district councils. R: This relates implementation and joint working between different authority areas. The policy and supporting text do not prevent working across districts to ensure the cascade is properly applied.</p> <p>I: Unclear on approach to CIL where affordable housing is to be provided off-site. R: CIL cannot be used for affordable housing provision by the SDNPA. This is set out in national policy and guidance on CIL. It is unnecessary to repeat this guidance in the Local Plan.</p> <p>I: Concern re how SDNPA will identify what is a genuinely affordable rent. R: The definitions of social rented and affordable rented are provided in the Glossary. These definitions reflect the NPPF. Paragraph 7.61 clarifies that levels of rent for affordable rented homes must be genuinely affordable, and must not exceed the relevant Local Housing Allowance.</p> <p>I: Requirement that affordable housing should take preference over all other requirements is a decision that should be based on local circumstances, e.g. development briefs or neighbourhood plan</p>

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Summary of Issues and Responses

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<p>Paribas and has sometimes significantly higher costs of development compared with greenfield sites. Policy should instead require c.30% on PDL sites but with flexibility for site specific costs. (West Sussex County Council, Cowdray Estates)</p> <ul style="list-style-type: none"> • The burden of this policy together with other policy requirements will in many cases fail to allow a competitive return to a willing landowner (NPPF paragraph 173 cited). This will mean that no sites will come forward. Examples of other competing requirements are Policy SD27 Mix of homes, high design standards, low densities and provision of zero carbon homes. One respondent cited evidence of decline of SME house builders over the last 30 years. (various organisations) • Unclear on what part 2 of the policy cross-refers to. Viability exception should also apply to larger sites of 11+ dwellings. (Barlavington Estate) • Levels of affordable housing contribution are far too prescriptive and not justified due to huge flexibility in house prices across the region. Example given of conversion of former employment buildings to provide modest sized dwellings for private rent. (Bryan Jezeph Consultancy Ltd) • Requirement to provide complex viability assessments discourages landowners from bringing forward proposals. (Bryan Jezeph Consultancy Ltd) • The phrase 'meaningful financial contribution, to be negotiated case by case' is very vague and does not provide the necessary level of guidance for any potential developer to assess the prospects for development. (Bryan Jezeph Consultancy Ltd) • Current policy wording is ambiguous and may in some cases lead to no contributions being made to affordable housing or other aspects. Recommend policy is reworded. (Comer Homes) • The typologies used in the Whole Plan Viability Assessment (BNP Paribas, 2017) do not reflect the lower densities being proposed 	<p>allocations; local need for market housing; downsizing; existing stock of affordable housing; provision in other areas, and the limited supply of land.</p> <p>R: Paragraph 7.60 clarifies that there is flexibility to take account of robustly produced local evidence, when considering tenure mix.</p> <p>I: Policy (sliding scale of affordable housing requirement) does not reflect the Written Ministerial Statement (WMS), which sets thresholds of 10 units or less or 1,000 sqm or less for seeking on-site affordable housing, and of 5 units or less in National Parks / Designated Rural Areas for seeking commuted sums.</p> <p>R: It is confirmed that the Local Plan proposes to take a different approach to that set out in the WMS and Planning Practice Guidance. The justification for this, which includes the particularly acute lack of housing affordability in the National Park, the National Park duty, and reliance on small sites, is set out in the Affordable Housing Background Paper (TSF 12).</p> <p>I: A target of 50% affordable housing on sites of 11 or more may prevent the delivery of homes, and does not reflect the evidence in the Dixon Searle LLP report on viability (TSF 13). Particular concern over deliverability of 50% on previously developed land.</p> <p>R: The Whole Plan Viability Study undertaken by BNP Paribas (Core 13) demonstrates the deliverability of 50% affordable housing on the majority of site typologies tested, including previously developed ones (e.g. Typology 13 – town-based infill, houses). The study concludes:</p> <p>“Our assessment indicates that most development typologies providing 11 or more units can viably provide 50% affordable housing, with the exceptions being those at the very bottom of the value range. The unviable scenarios could come forward with alternative tenure mixes or with reduced affordable housing percentages if a proven viability case is submitted reflecting site-specific factors. We would also expect improvements in market</p>

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<p>on some allocation sites, and is considered to underestimate the build cost of flats. The study also does not test larger allocations made through the Plan which are critical to housing supply. (Cove Homes)</p> <ul style="list-style-type: none"> Given a high affordable housing requirement of 50%, the overall housing target should be increased to nearer the ‘high’ level. To not do so will mean the OAN will be far from met and strategic housing need will not be addressed, putting significant pressure on surrounding authorities. Propose alternative requirement of 35-40% affordable housing. (EPV (East Sussex) Ltd) Too much emphasis/reliance placed on Community Land Trusts – there are very few in existence. Local housing authorities and registered providers are likely to be the main agents of delivery. HARA is a good example of a successful delivery partnership. Policy should emphasise these. In 7.61 the phrase ‘genuinely affordable’ requires clarification. Linking affordability so closely to Local Housing Allowance makes the policy too rigid to adapt to new measures and affordable housing products. Alternative wording suggested. Request option for local connections to extend to parishes adjoining the National Park. (Hampshire Alliance for Rural Affordable Housing - HARA) For developments of 10 dwellings or less, the level of affordable housing delivery is unlikely to generate interest from Registered Providers (RPs) who will see significant management issues in serving a small number of isolated units in remote locations within the National Park. Community Land Trusts (CLT) will be very difficult to administer given the nature of these organisations and the complexity of delivery/management. (Murray Planning Associates) Links should be made between these policies and SD34 Sustaining the Local Economy. Affordable Housing development that is to be built with locally sourced sustainable building materials should be 	<p>values over the plan period to extend the range of viable typologies to these lower value cases.” (para. 8.4)</p> <p>The BNP Paribas study uses more up-to-date evidence on market conditions and real estate values, and also factors in greater certainty on CIL (which has now been adopted by the SDNPA). It is therefore considered the more reliable of the two studies undertaken on this matter.</p> <p>I: The burden of this policy together with other policy requirements will in many cases fail to allow a competitive return to a willing landowner.</p> <p>R: The Whole Plan Viability Study (Core 13) factors in other policy requirements that may affect the cost of development. For example, there are additional uplifts of 7.5% and 6% applied to base build costs to account for enhancements to landscaping/design, and more stringent carbon reduction/water consumption standards, respectively. The mix of house sizes assumed reflect Policy SD27: Mix of Homes (para. 5.5). The report also explains how the principle of a competitive return to the landowner has been built in, essentially assuming an approximate 14-fold increase in the value of agricultural land, and a 20% uplift on the value of land whose current use is commercial (Core 13, para. 5.42 & 5.43).</p> <p>I: It is unclear on what part 2 of the policy cross-refers to. Viability exception should also apply to larger sites of 11+ dwellings.</p> <p>R: Criterion 2 of the policy has been amended (SDLP01.1 Schedule of Changes, p15) to clarify that the viability test can apply to all sizes of site, i.e. the whole of part 1 of the policy.</p> <p>I: Levels of affordable housing are too prescriptive and do not reflect variability in house process across the region.</p> <p>R: The policy is designed to provide certainty to developers and communities, and respond to the substantial need for affordable housing in the National Park.</p>

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Summary of Issues and Responses

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<p>looked on more favourably, thus supporting the local forestry industry. (South Downs Land Managers Group)</p> <ul style="list-style-type: none"> • Welcome approach to including all development in Use Class C3 being subject to the policy. However consider that 7.68 is in contravention of PPG paragraph 017, Ref ID: 10-017-20140306 which makes clear that planning applications should be considered in today’s circumstances unless a scheme phases delivery over a medium or longer term. This is confirmed in Government guidance ‘Section 106 Affordable Housing Requirements Review and Appeal’ and RICS guidance GN 94/2012 Financial Viability in Planning. (McCarthy and Stone Retirement Lifestyles Ltd) • Reduced housing supply presents ‘easy pickings’ for housebuilders who will pay lip-service to sustainability, with locations and designs that place a high dependence on the individual car and with provision of a minimum of affordable housing for reasons of “viability”. (The Goodwood Estate Company Ltd.) <p>Individuals</p> <ul style="list-style-type: none"> • Policy is contrary to NPPF paragraph 173 requiring that sites should not be subject to a level of policy burdens that threatens viability, and Written Ministerial Statement of 28 November 2014 and PPG ref: 3b-031-20161116 which sets a lower threshold of 5 units in national parks and only tariff style contributions up to 10 units. (various individuals) • Young people are being priced out of villages and the policy does not go far enough. Support a positive policy of temporary accommodation for young people to stay living in the countryside. (Lewes District Council, Cllr Victor Ient) • Welcome policy upper threshold of 11, percentages, and move to prevent developers circumventing the policy by dividing sites or claiming unviability. (Cllr Joanna Carter, Green Party, Lewes District Council) 	<p>I: The requirement to provide complex viability assessments discourages landowners from bringing forward proposals. R: The policy reflects standard practice. It also reflects that the inability to provide the requisite amount of affordable housing will be exceptional, and therefore provision of a viability assessment also will be exceptional. Viability appraisal is a tool commonly used by developers to inform commercial decisions on land acquisition and purchase price, irrespective of planning policies.</p> <p>I: The phrase 'meaningful financial contribution, to be negotiated case by case' is very vague. R: The SDNPA will be producing a Supplementary Planning Document (SPD) on Affordable Housing in the coming months which will set out a methodology for calculating financial contributions.</p> <p>I: The typologies used in the BNP Paribas Whole Plan Viability Study (Core 13) do not correspond well to densities and site sizes being proposed as Local Plan allocations. R: The seventeen development typologies have been designed to reflect the types of sites in the emerging Local Plan, as well as reflecting recent planning permissions. (Core 13, paras. 5.1-5.6)</p> <p>I: The Whole Plan Viability Study (Core 13) underestimates build costs. R: BNP Paribas have used the RICS Building Cost Information Service (BCIS) to source their base build costs, and applied an uplift factor of 20% as a local adjustment. There are additional uplifts of 7.5% and 6% applied to base build costs to account for enhancements to landscaping/design, and more stringent carbon reduction/water consumption standards, respectively. The report confirms that these are cautious assumptions and in reality, the additional costs will be lower than assumed in the study.</p>

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Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Statement that insufficient affordable housing provision which is contrary to the policy is a significant factor weighing against approval is wholly unjustified and in conflict with the NPPF and PPG. Policy is not supported by evidence, including that prepared in relation to the Old Malling Farm strategic site where the Secretary of State’s Inspector concluded that 40% affordable housing was reasonable. Concern over strict requirement to integrate affordable units throughout a development, given some Registered Providers (RPs) require affordable units to be located together for management purposes. Exceptional circumstances requiring an off-site payment should be expanded to smaller sites, to allow for where RPs are not in a position to manage the properties. The Authority appears to countenance acceptance of Neighbourhood plans which fail to set concrete targets to be achieved within measurable timescales. No suggestion that larger sites should be looked at to maximise affordable housing numbers. Some Neighbourhood plans seek to limit site density although this may mean that the financial viability of such sites to provide affordable housing becomes an issue. The affordable housing target of 293 per year over the plan period seems very low. The sliding scale in the policy is not flexible and will not help those who need affordable housing. Concern that the policy creates too much of a burden on small holding landowners looking to deliver less than 5 new homes. Policy fails to take into account the following criteria: the needs of the local community for additional market housing; the need for downsizing opportunities; the proportion of affordable housing already provided in the community; the likelihood of affordable housing being provided in other areas, and the limited supply of land. The policy could undermine recently made neighbourhood 	<p><i>I: Given a high affordable housing requirement of 50%, the overall housing target should be increased to nearer the ‘high’ level to avoid pressure on other local authorities.</i> R: The proposed level of housing provision overall in the National Park has been shown to be the most appropriate strategy through the Sustainability Appraisal and taking account of public consultation. Significant affordable housing is expected to be delivered within that number.</p> <p><i>I: Affordable Housing development that is to be built with locally sourced sustainable building materials should be looked on more favourably, thus supporting the local forestry industry.</i> R: Policy SD5: Design and Policy SD48: Climate Change and Sustainable Use of Resources require sustainable design for all developments. There is no need to duplicate these requirements in Policy SD28.</p> <p><i>I: Paragraph 7.68 [concerning a clawback clause in S106 agreements] is in contravention of PPG paragraph 017, Ref ID: 10-017-20140306 which makes clear that planning applications should be considered in today’s circumstances unless a scheme phases delivery over a medium or longer term. This is confirmed in Government guidance ‘Section 106 Affordable Housing Requirements Review and Appeal’ and RICS guidance GN 94/2012 Financial Viability in Planning.</i> R: A clawback clause will allow the Authority to recoup affordable housing contributions that would have been required, where the actual development (sale) value is higher than anticipated thus increasing the margin of viability to make such contributions. This is considered a reasonable and proportionate approach which is already in use in other authority areas, and may reduce time taken to agree the details of the submitted viability appraisal.</p>

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<p>plans that meet locally identified needs in a different way to that proposed by this blanket approach.</p>	<p><i>I: Support a positive policy of temporary accommodation for young people to stay living in the countryside.</i> R: The policy as drafted is considered to address this point as far as is possible within the scope of the Local Plan.</p> <p><i>I: Concern over strict requirement to integrate affordable units throughout a development, given some Registered Providers (RPs) require affordable units to be located together for management purposes.</i> R: The integration of affordable units with other tenures is widely acknowledged as good practice. There is nothing in the policy text that would prevent clustering of affordable units, which can be achieved whilst also integrating with the wider development. The supporting text (7.74) acknowledges the operational management requirements of the relevant housing association.</p> <p><i>I: Some neighbourhood plans seek to limit site density although this may mean that the financial viability of such sites to provide affordable housing becomes an issue.</i> R: This is a matter that should be considered during neighbourhood plans' preparation stages, drawing on local evidence.</p>

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Summary of Issues and Responses

Policy SD29 Rural Exception Sites

There were a total of 27 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Would prefer paragraph 7.80 to read "...on the ability of the natural <u>and historic</u> environment to contribute to ecosystem services..."</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Object to part 3 as the policy (and 7.81 with respect to councils) should refer to housing associations, councils/local housing authorities, registered providers, HARA and the Hampshire Community Housing Partnership. Where sites/settlements are near the edge of the National Park, local connections criteria should include adjoining parishes outside the Park. Market housing provided where justified by viability (7.79) is a key issue that should be addressed in the policy itself. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • The policy is welcomed/supported. (Cheriton PC, Liss PC, Petersfield TC, Steyning PC) • Would wish to see the wording of the policy and supporting text tightened so that the role of the Parish in identifying need, subsequent allocation, size, type and occupancy criteria/conditions is formalised, and role as link between SDNPA and local housing authority recognised. Amended wording suggested along these lines. (Corhampton & Meonstoke PC) • Policy fails to appreciate the high cost of land and building in the SDNP, and would be more successful if it allowed for a small number of market houses to fund the social housing and/or community facilities. (Itchen Abbas PC) • Policy should recognise that it is not always possible to provide affordable housing in perpetuity given a community land trust's potential need to sell 	<p>R: Policy SD29 (3) should refer to housing associations, councils/local housing authorities, registered providers, HARA and the Hampshire Community Housing Partnership.</p> <p>I: The SDNPA considers that community support and buy-in are crucial in delivering rural exception sites. The current wording is therefore appropriate. In practice, rural housing providers and local housing authorities will be involved as appropriate.</p> <p>R: Where sites/settlements are near the edge of the National Park, local connections criteria should include adjoining parishes outside the Park.</p> <p>I: This is an issue with implementation and joint working between different authority areas. The policy and supporting text do not prevent working across districts to ensure the cascade is properly applied.</p> <p>R: The wording of the policy and supporting text should be tightened so that the role of the Parish in identifying need, subsequent allocation, size, type and occupancy criteria/conditions is formalised, and role as link between SDNPA and local housing authority recognised.</p> <p>I: Paragraph 7.82 states that rural exception sites should take into account the aspirations of the local community. The wording of the policy and text is clear that the local community should be involved in working up details of the scheme.</p>

Policy SD29 Rural Exception Sites