

BRIDFORD PARISH COUNCIL

Dartmoor National Park Authority
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28 October 2019

By email to: forwardplanning@dartmoor.gov.uk

Dear Sirs

Dartmoor Local Plan Final Draft Consultation (Regulation 19)

We thank you for your letter dated 16 September 2019 drawing attention to the publication on your website of the final draft Local Plan.

The Bridford parish councillors use their best endeavours when acting on behalf of their parishioners and would like to ensure that the new Local Plan is in their best interests which is why we wrote our 1,600 word letter dated 4 February 2019 in response to the First Draft Consultation (Regulation 18). The letter was acknowledged as having been received but we were disappointed to find that our comments had made almost no impact on the final draft of the Local Plan. We continue to believe that our comments are valid but we do not propose to repeat them in another letter. We will therefore focus on just one area of policy, housing and affordable housing in particular, and go into more detail on the assumption that this letter will be read by the Secretary of State who will not be nearly so familiar with Dartmoor.

We believe that the policies for housing might be legally compliant insofar as you have attempted to follow the appropriate procedures but we believe that your assumptions in relation to housing are unsound leading to some inappropriate proposed policies.

We have read the Statement of Common Ground, we have found it to be full of fine words and intentions, we have seen that as requested by neighbouring authorities you have specified the number of new homes that will be built in the National Park each year (65) but we cannot see any evidence in the final draft of the Local Plan that you taken into account of any of their assumptions and plans.

You have published on page 21 of the draft Local Plan a map of the Dartmoor National Park. This map shows that there is a ribbon of development close to the

boundary around the whole of the National Park and that most of Dartmoor's local centres, rural settlements, villages and hamlets are contained within this development. The map also shows, with the notable exception of Exeter, the key settlements that are outside the National Park. The map does not however show all of the other rural settlements, villages and hamlets that are also outside the National Park and which are just as numerous as those that are on the inside. The map also shows that to a significant extent all of the settlements in the ribbon of development are linked together by the dual carriage ways of the A30 and A38 to the north and south-east and by the A386 to the west. The map does not show the railway which also links Plymouth with Exeter and the proposed railway which will link Okehampton with Exeter.

As most of Dartmoor's local centres, rural settlements, villages and hamlets are so well linked together not only with each other but also with the cities, towns and villages just outside the boundary we believe that the Local Plan for Dartmoor should take account of the Local Plans for the surrounding planning authorities. There does not appear to be any evidence that the draft Dartmoor Local Plan has been integrated with the surrounding areas in any way, indeed all of the indications are that it has been prepared on the assumption that Dartmoor exists as a remote island.

Housing Evidence Summary

The Housing Evidence Summary is on page 58.

- The housing affordability ratio for Dartmoor shows a median house price of £272,000 and median earnings of £22,034, and then computes a ratio of 12.43. Such a crudely calculated affordability ratio might be comparable in urban areas where the numbers of first time buyers and their opportunities to purchase flats and similar properties are both far more numerous but it would not remain valid in Dartmoor or other national parks which have an older demographic seeking comfortable homes and/or a lifestyle for their retirement.
- Furthermore the calculation of housing affordability ratio for Dartmoor should not assume that Dartmoor exists as a remote island and should not ignore the opportunities for first time buyers that exist in the string of towns that are situated immediately outside the boundary of the National Park.
- The comparison of the housing affordability ratio of 12.43 with the City of London, the Cotswolds, London, Poole, Exeter, Richmondshire and Northumberland is nothing less than bizarre. It makes no sense to compare the housing affordability ratio for Dartmoor with urban areas such as London and Exeter, which offer first time buyers far better opportunities for both employment and for the purchase of purpose built flats for, or with northern areas such as Richmondshire and Northumberland, which in general have far lower property prices. Valid comparators for Dartmoor would be such other national parks as the South Downs, the New Forest and Exmoor and such other areas as the Cotswolds, the Chilterns and (possibly) the South Hams.

- Dartmoor's approximate age profile identifies a "Severe ageing population". It is likely that the data shows an ageing population that is consistent with the whole of the developed world and so it is inappropriate to describe this trend as being "severe".
- The existing drift of the more infirm and elderly away from Dartmoor with its old and difficult to maintain housing stock, its challenging terrain, its inclement weather and its relatively poor provision of transportation and services is likely to gather pace as their numbers increase and so the trend towards an ageing population is likely to be less pronounced than in comparator areas.
- Dartmoor's approximate age profile also identifies a "Loss of working Population" and a "Shortage of skills and labour". The profile shows that between 2018 and 2035 there will be little change in the age profile up to age 50. No data or other evidence has been presented to support the assumption that there is or will a shortage of skills and labour.
- The lack of opportunities for employment in Dartmoor means that far from there being a shortage of skills and labour there is in fact a large net surplus of skills and labour with the result that residents have to seek employment outside the National Park.
- The assumption that Dartmoor's high housing affordability ratio has caused the loss of working age population is fundamentally flawed. The limited opportunities for employment, particularly for those of younger working age, is a much more significant cause.
- There are also generational differences with those of younger working age finding that the city lights have far more appeal than the country life enjoyed by their parents.
- The assumption that the proposal to increase the provision of dwellings from 50 to 65 per annum will disproportionately increase the numbers of working age population is unlikely to be valid unless it is matched with policies for increasing opportunities for employment. The draft Local Plan does not seem to include any policies which will increase the opportunities for employment in Dartmoor.
- There were obvious errors in the data shown in the first draft of the Dartmoor Local Plan 2018-2033. The data suggested that an increase in the number of dwellings delivered from 50 to 65 per annum would increase the population of females below the age of 20 but not of males and would increase the working age population but not the population aged over 60. These obvious errors have been addressed but we continue to have low confidence in the accuracy of the data provided.

Strategic Policy 3.3 (2) **Housing in Local Centres**

This Policy is on page 69.

- In our opinion the draft Local Plan has an unjustified obsession with affordable housing which has led to some inappropriate draft policies such as the

requirement for housing in local centres to comprise not less than 45 per cent affordable housing.

- This however is just one example because a word search for “affordable” produces 234 results and so affordable housing permeates much of the draft Local Plan.
- We agree that there are national issues with the supply of affordable housing. The root cause of this problem has been a failure of house building to keep up with the demand for housing. The solution is for the nation, but not its national parks, to build more homes.
- There is no explanation for the requirement for 45 per cent of new dwellings on allocated sites to be affordable, why 45 per cent? Housing and affordable housing in particular needs to be matched with opportunities for employment rather than an arbitrary percentage of new dwellings.
- In our opinion the trends identified in 3.1.2 have been misinterpreted.
 - The data indicating high housing unaffordability is, for the reasons previously stated, invalid.
 - There is no reduction in the working age population except for a small reduction in those aged between 50 and 60 and furthermore there is a there is a large net surplus of skills and labour, so it will not be increasingly difficult for local businesses to recruit and retain staff.
 - The existing drift of the more infirm and elderly away from Dartmoor is likely to gather pace and will keep in check any increases in under-occupancy by the old.
 - There is no decrease in the population below the age of 50 and so there will not be any decrease in demand for services and facilities for younger people or any increasing difficulty to sustain them in smaller communities.
- Notwithstanding that the Local Plan has failed to demonstrate a housing need we nevertheless agree that there should be some strictly limited increases in housing, mixed in terms of size, type and tenure, to help sustain Dartmoor’s communities and to help keep them vibrant.

Definition of Affordable Housing

This definition is on pages 64 to 65.

- We agree that it is reasonable to exclude garages and possibly car ports from the definition of affordable housing. However Dartmoor has relatively poor provision of public transport, high rates of car ownership and high rates of travel to work by car, so a car is much more of a necessity than it is in most urban areas. A parking space with an electric vehicle charging point should therefore be included within the definition of affordable housing.
- In only 20 years time the sale of conventional vehicles will have come to an end and all vehicles will be electric powered. Homes without charging facilities could become impractical or even obsolete within the foreseeable future.

- Residents without a garage are likely to consider a storage facility for anything from a bicycle to a mobility scooter to be more useful than a modest amount of garden space which would require some basic gardening tools and so add to the need for a storage facility.

Yours faithfully

Joan Banks
Clerk to Bridford Parish Council