

## **Dartmoor Local Plan: Final Draft Consultation (Regulation 19)**

### **Representations**

Teignbridge welcomes the opportunity to comment on the final draft version of the Dartmoor Local Plan and is pleased to see that many of the representations made on the Regulation 18 consultation have been taken into account and reflected in the revised draft.

### **Chapter 2 - Environment**

#### **2.3 Biodiversity & Geodiversity / South Hams SAC / 2.3.9 - 11**

Consideration should be given to a specific policy for the South Hams SAC, based on the recently adopted Greater Horseshoe Bats HRA Guidance.

Whilst this is referenced in the supporting text there is no detail within policy relating to the Landscape Connectivity Zone, or other important related components.

It does represent a cross boundary issue with the greater horseshoe bat population spanning multiple administrative areas. The approach agreed by the partner authorities in the Guidance needs to be implemented in policy to give it the necessary weight to enforce. Teignbridge will be doing this in the forthcoming Draft Local Plan Part 1.

### **Chapter 3 - Housing**

#### **3.1 Housing Development in Dartmoor National Park / Strategic Policy 3.1**

We are concerned about the requirement in Strategic Policy 3.1 for allocated sites to require evidence of current affordable housing need.

This is a forward looking plan based on current projections of need and in order for a developer to have any certainty over permission then the acceptability of the development in principle should be established from the outset.

The transient nature of need and lead in times for development mean that if there is uncertainty over whether a site might be permitted or not will mean that need may inevitably be met elsewhere where there is certainty over development (i.e. Teignbridge allocated sites) placing more pressure on our already high housing needs.

## **Housing Need**

Housing Needs Assessment are identified as a requirement through several proposals and policies and appear key to bringing forward residential sites.

There is potential for huge variation in these assessments and it is important that the plan establishes a consistent approach in the methodology, data collection and analysis. Such a course would avoid a challenge on the methodology and findings in each case, provide certainty to developers in their preparation and officers in their application to policy.

Clarity should also be provided on the following:

- who is responsible for their preparation,
- who covers the cost (i.e. the developer when outside the annual HNS programme)
- reliance on the Devon Homes Choice Register is insufficient and
- what is considered an up to date survey, i.e. can it be more than 2-3 years old?

The glossary at the end of the document does not provide additional detail on the above but there is an opportunity within the plan to ensure consistency in the preparation and application of Housing Needs Assessment.

### **3.7 Custom and Self Build Housing / Policy 3.6 (2)**

Policy 3.6 - Custom and Self Building Housing, item 2a restricts the size of the dwelling to 93m<sup>2</sup>. Teignbridge support the approach of floor area restriction but there is currently a potential conflict between Dartmoor's maximum size and Teignbridge's which stands at 100m<sup>2</sup>.

In terms of cross boundary sites, it is possible that the same product could have different size limits depending on which side of the boundary they stand.

### **3.10 Gypsy & Traveller Accommodation**

The change in relation to the consideration of Gypsy and Traveller pitches outside of Dartmoor National Park is welcome.

---

1<sup>st</sup> November 2019