



**DARTMOOR NATIONAL PARK AUTHORITY
LOCAL PLAN REVIEW 2020-2036**

**SUSTAINABILITY APPRAISAL (SA)
Note on Reasonable Alternatives &
Growth Scenarios**

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DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN 2036 SUSTAINABILITY APPRAISAL (SA) Note on Reasonable Alternatives & Growth Scenarios

The Dartmoor Local Plan 2020-2036: Representations to Regulation 19 Consultation

1. The draft new Dartmoor Local Plan to 2036 was subject to formal public consultation¹ from 16 September to 1 November 2019. One representation² considers that the proposed housing figure set out in the draft Plan "*...is not justified, as the evidential basis has not been informed by an adequate assessment of reasonable alternatives.*" (paragraph 3.36).
2. The representation noted that within the Housing Topic Paper (v3 September 2019)³ (from 5.2.3) there is a review of the merits of different projected scenarios – lower, current and a higher level of growth. However, none of the alternative housing figures appear to have been subject to the SA process. "*The SA is focused on options for the Spatial Strategy alongside options for site allocations, yet there is no comparable assessment for alternative scenarios for the housing growth figure for the National Park.*" (paragraph 3.42).
3. The representation concludes that "*... there has been no robust assessment of the 65 homes per annum figure (or alternatives) in either the SA or other supporting evidence. Indeed, it is not clear how this figure was reached. It is our view that this level of housing provision is insufficient and needs to be increased.*" (paragraph 6.5). Changes sought include a request for "*further research to establish an appropriate housing requirement figure*" and "*at the very least, a SA should be conducted of the different housing provision scenarios.*" (paragraph 6.13).
4. This SA Note seeks to provide further clarification regarding the consideration of reasonable alternatives during the SA of the emerging new Local Plan for the Dartmoor National Park. The SA has been undertaken in an iterative and ongoing way with plan-making since 2017. The purpose of this SA Note is to set out the reasoning and reporting of alternative scenarios and appraisal throughout this time into this one document to help facilitate decision-making and to clearly demonstrate process compliance. Thus, this SA Note comprises part of the SA documents that support the draft Local Plan for Dartmoor National Park and is provided with the other evidence for submission to the Secretary of State for independent examination.

The SA Reports & Reasonable Alternatives (2017-2019)

5. Initial SA Report (December 2017): Tests 4 reasonable options to a spatial strategy for Dartmoor – and subject to public consultation. These are

¹ <https://www.dartmoor.gov.uk/living-and-working/business/planning-policy/local-plan-review>

² Boyer on behalf of Cavanna Homes (October 2019)

³ <https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence>

distribution scenarios based on size/scale etc of settlements. No representations were received on the SA of these strategic scenarios.

6. Regulation 18 SA Report (October 2018): Explains the approach to testing reasonable alternatives – Section 4; explains and reports SA findings for the 4 strategic options (distribution scenarios) for the Spatial Strategy – Section 5. Strategic options assessed using the same SA Framework of SA objectives in a comparable way and including the option that was progressed as the preferred option. Includes paragraph 5.18 with Table 5.2 that outlines the reasons for progressing option 3 and rejecting options 1, 2 & 4, and thus explicitly demonstrates compliance with requirements of the SA Regulations. No representations were received on the SA of these strategic options (Appendix VII).
7. Regulation 19 SA Report (June 2019): Includes sections 4 and 5 as described above. Section 6 explains the refinement of the spatial strategy since Regulation 18 and updates/confirms the earlier SA findings. One representation received by Boyer on behalf of Cavanna Homes in respect of the absence of any SA of alternative growth scenarios/housing figures.

Response to the Representation

8. The Pre-Submission Draft SA Report (June 2019) does not explicitly refer to the 3 growth scenarios – lower, current, higher – as explained in paragraph 5.2.3 of the Housing Topic Paper (September 2019). Plan-making was informed by technical studies and consultation comments. At the Regulation 18 stage (2018) the initial demographic study investigated growth scenarios of 30, 50 and 80 dwellings. The preferred approach that was presented in the first Draft Local Plan was an indicative housing delivery figure of 65 homes each year across the National Park (paragraph 3.1.4). It was considered that the other housing figures were not appropriate or reasonable for the Dartmoor National Park. The explanation was set out in the Housing Topic Paper (v3 September 2019) supported by a further demographic study – and subject to consultation at the Regulation 19 stage (September 2019). This reflects the approach made by the National Park Authority to develop an indicative housing figure rather than a target – to make clear that development will come forward at a rate that reflects local need identified at the local level through housing needs assessments.
9. Sustainability Appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations (2004)⁴ that require “*an outline of the reasons for selecting the alternatives dealt with...*” (Schedule 2 Information for Environmental Reports). The Government guidance on SA⁵ explains how the SA should consider alternatives - the SA should “*outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option).*” The SA should “*provide conclusions on the reasons the*

⁴ <http://www.legislation.gov.uk/ukxi/2004/1633/schedule/2/made>

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives". The guidance further explains that "reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made."

10. It is accepted that the SA Report has not explicitly explained that plan-making investigated 3 scenarios for housing figures and concluded that only one scenario – the growth approach that equates to delivery of 65 dwellings per year – was considered to be a reasonable scenario that should be tested through the SA process. This SA Note seeks to rectify this omission by outlining the reasons for identifying, selecting, rejecting and assessing alternatives.

Reasons for Selecting & Rejecting Housing Figure Scenarios

11. Plan-making investigated 3 growth scenarios prior to the Regulation 18 stage, as follows:

- Lower Growth: 30 dwellings per annum
- Medium Growth: 50 dwellings per annum
- Higher Growth: 80 dwellings per annum

12. After further housing evidence was produced it became apparent that the medium growth scenario (currently 50dph) would not meet the identified affordable housing need, and an indicative housing figure of 65 dwellings per annum would be necessary under this strategy.

13. It was considered that the Lower Growth and the Higher Growth scenarios were not reasonable alternatives and therefore, there was no requirement to test them through the SA process. An outline of the reasoning for selection or rejection of scenarios is shown in the following table:

Housing Strategy	Housing Figure	Outline Reasons for Selection or Rejection
Conservation and enhancement of National Park while meeting some, but not all, affordable housing needs	Lower Growth 30 dph	<ul style="list-style-type: none"> ■ Would depopulate the National Park ■ Significant increased proportion of older people and a significant fall in younger & working age people – creating an imbalanced population ■ Gradual depopulation would place greater stress on the sustainability of communities & their ability to support local services ■ Not consistent with national policy ambition of meeting affordable housing need
Conservation and enhancement of	Medium Growth	<ul style="list-style-type: none"> ■ Deliverability proven and viability of sites achievable

National Park while meeting affordable housing needs and partly mitigating population change	(currently 50dph, proposed 65 dph)	<ul style="list-style-type: none"> ■ Can be achieved alongside conservation and enhancement of National Park ■ Will deliver against the affordable housing need calculated in the Housing Topic Paper ■ Reasonable balance between conservation objectives and affordable housing delivery
Exceeding affordable housing needs and delivering open market housing to address population change, less emphasis on conservation and enhancement of the National Park	Higher Growth 80 dph	<ul style="list-style-type: none"> ■ Could lead to either an over-delivery of affordable housing beyond identified needs, or a clear erosion of the priority of affordable housing ■ High sensitivity of the National Park landscape to change setting a constraint to growth ■ Not consistent with national policy which seeks to focus housing development in National Parks on local affordable needs.

14. The preferred indicative housing figure was developed from the preferred approach of a housing strategy which conserved and enhanced the National Park whilst also meeting local affordable housing needs and mitigating the identified demographic issues. This was presented in the emerging spatial strategy in the Regulation 18 Draft Plan and accompanying SA Report. The outline reasons for progressing 65 dph rather than 50 dph is that this approach would continue to meet the National Park's affordable housing need. Evidence indicates that continuing the current level of growth (50 dph) would not meet local affordable need. This approach also goes some way to addressing the National Park's demographic issues.

15. A further demographic study was undertaken that supported the preferred approach of 65 dph and this was presented in the Regulation 19 Draft Local Plan. The SA of the final draft growth scenario as presented in the Spatial Strategy SP1.4 is reported in section 6 of the Pre-Submission SA Report (paragraphs 6.9-6.14).

16. It may be noted that the SA did assess all reasonable options for potential site allocations and clearly set out the reasoning for selection or rejection of such site options (Table 6.2 SA Report, June 2019).

Summary & Conclusion

17. One representation to the Regulation 19 SA Report was concerned that the SA had not undertaken a comparative SA of the 3 growth scenarios – lower, current, higher – as explained in the Housing Topic Paper. The SA only assessed the one preferred growth scenario of 65 dph as it was considered that the other scenarios were not reasonable alternatives for the DNPA Local Plan.

18. It is accepted that the SA Report should have explained this explicitly in order to demonstrate clearly compliance with the SA Regulations. Therefore, this SA Note provides clarification and explains how alternative options for growth were identified and consulted upon – helping to develop the preferred option that was considered to be the only reasonable alternative that could be progressed by the emerging draft Plan and thus requiring testing through SA.
19. The reasoning for selection of the preferred option was that it is deliverable and provides a reasonable balance between conservation objectives and affordable housing needs. The other growth scenarios were not considered to be reasonable due to depopulation (lower growth) and negative effects on the sensitive landscape of the National Park and accordance with national policy (higher growth). This SA Note constitutes a further part of the SA Report (June 2019) that is submitted with the Draft DNPA Local Plan to the Secretary of State for independent examination in due course.