



**DARTMOOR LOCAL PLAN**  
guiding planning applications in Dartmoor National Park

## TOPIC PAPER 6

### Housing

Version 4

September 2020



# Contents

1	Introduction.....	5
1.1	Objectives .....	5
2	National Policy context.....	6
2.1	Statutory National Park purposes and duties .....	6
2.2	National Parks Circular 2010.....	6
2.3	National Planning Policy Framework.....	6
2.4	National Planning Practice Guidance .....	6
2.5	High court judgements – affordable housing threshold.....	7
2.6	Funding for affordable housing.....	8
2.7	Welfare reform.....	8
2.8	The Right to Buy .....	8
3	Introducing the Local Context .....	9
3.1	Capacity for change: sensitivity and constraint .....	9
3.2	House prices.....	10
3.3	Wider ‘Housing Market Areas’ context .....	12
4	Analysis of Housing Need and Supply .....	13
4.1	Analysis of housing need.....	13
4.2	The Plymouth and Exeter Housing Market Areas (HMAs).....	14
4.3	Edge Analytics Forecasts .....	16
4.4	Strategic Housing Market Areas (SHMAs).....	17
4.5	Vacancy rates.....	17
4.6	Job growth and economic forecasts.....	19
4.7	Market Signals.....	21
4.8	Understanding affordable housing need .....	21
4.9	Understanding the current local market and housing need.....	22
4.10	Affordability.....	23
4.11	Housing costs data .....	23

4.12	Income Data .....	24
4.13	Local Housing Need evidence.....	25
4.14	Response to consultation on issues.....	26
5	Local Plan Strategy - aims and objectives .....	28
5.1	Overall LP aim and objective for housing provision .....	28
5.2	Proposed housing number .....	29
5.3	Response to Consultation on Issues.....	32
5.4	Exeter and Plymouth Housing Market Areas .....	34
5.5	Spatial Strategy and the distribution of housing growth.....	36
6	Type of Housing Required .....	42
6.1	Types of need by population .....	42
6.2	Housing for older people and specialist accommodation.....	42
6.3	Tenure Split .....	44
6.4	Social and Affordable rents .....	45
6.5	Affordable/intermediate sale.....	46
6.6	Eligibility and use of local connections .....	48
6.7	Principal residence .....	49
6.8	Size restrictions on market/affordable sale .....	50
6.9	Role of Community Led Housing.....	51
6.10	Role of Custom and Self Build Housing .....	52
6.11	Private rented sector .....	53
6.12	Gypsies and travellers .....	54
6.13	Low impact development / one planet development.....	55
6.14	Rural workers' accommodation .....	58
7	Delivery: different types of site and development .....	63
7.1	Allocated sites .....	63
7.2	Small sites .....	64
7.3	Infill sites.....	64
7.4	Off-site contributions.....	65
7.5	Rural Exception Sites .....	67

7.6	Entry-level Exception Sites and Starter Homes .....	68
7.7	The need for community infrastructure.....	69
7.8	Sub-division of housing in the countryside .....	70
7.9	Amalgamation of homes.....	72
7.10	Empty homes.....	72
7.11	Homes for meeting local need.....	73
7.12	Restrictions in perpetuity .....	74
7.13	Use of covenants to safeguard future sales .....	75
7.14	Staircasing restrictions on shared ownership properties.....	75
7.15	Mortgagee in possession clauses .....	76
7.16	Cascades.....	77
7.17	Cascade Advertising Timescales .....	77
7.18	Local Authority Allocation Schemes .....	78
7.19	Working with local communities and parishes on Local Lettings Plans .....	78
7.20	Minimising vacancy of affordable homes ('voids').....	78
7.21	How we will ensure the homes are occupied by eligible households .....	78
7.22	The Right to Mutual Exchange .....	79
7.23	Vacant Building Credit .....	79
8	Ensuring sufficient housing delivery.....	80
8.1	Ensuring enough homes in the right place.....	80
8.2	Ensuring housing delivery throughout the plan period (the housing trajectory) .....	83
9	Other measures to achieve housing objectives .....	89
9.1	Space standards.....	89
9.2	Reducing second home ownership .....	89
9.3	Householder Development - replacement dwellings, extensions and ancillary buildings .....	93
	Appendix 1 – Affordable Housing Need estimations.....	97
	Appendix 2 –Overview of alternative models approaches .....	100

# 1 Introduction

## 1.1 Objectives

1.1.1 This Topic Paper forms part of the evidence base that supports the emerging Dartmoor National Park Local Plan. A number of topic papers are being produced to coordinate and consolidate some of the evidence used in drafting the emerging local plan. All the topic papers are available to view online at:

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

1.1.2 The purpose of this topic paper is to gather evidence and serve as a starting point for developing planning policies related to housing. A significant amount of the commentary around housing numbers in this Topic Paper is taken from the Technical Analysis paper undertaken by Three Dragons and Associates. Invariably the paper will cover issues which overlap or compete with those in other parts of the evidence base (e.g. SA/SEA, Landscape Character Assessment, Spatial Strategy and Design). In light of this the Topic Paper's aims are to:

- review relevant legislation and policy which set the statutory framework for the local plan;
- describe the housing market, and analyse past supply and delivery;
- consider the quantum and nature of housing need in the National Park;
- identify key issues around need and supply/delivery, consider options and make recommendations for policy; and
- draw on a wide range of source material including research, guidance, best practice and professional advice to inform policy development.

1.1.3 The topic paper has been updated throughout the course of the local plan review to reflect new evidence or changes to national guidance or policy. The views of the local community, key stakeholders and partner organisations who all have an interest in the future of Dartmoor National Park forms part of the evidence base for the local plan. We have therefore welcomed comments on this Paper and made appropriate changes. The following summarises the changes made in each version:

Version	Changes made
<b>Version 1</b> May 2018	Original topic paper
<b>Version 2</b> December 2018	Updated to reflect new NPPF Updated affordable housing threshold, right to buy, house prices, analysis of need and supply, proposed housing number, spatial strategy, types of housing need, housing tenures, one planet development, space standards and second home ownership commentary. Chapter 7 added.
<b>Version 3</b> September 2019	Updated commentary Plymouth and Exeter HMA commentary pursuant to Duty to Cooperate discussions. Added Chapter 8 ensuring sufficient housing delivery Added Appendix 1 affordable housing need estimations
<b>Version 4</b> September 2020	Changes to text to cross reference to the 3D Technical Paper Clearer commentary in Chapters 4 & 5 on decision making process and cross reference to Regulation 22 and Authority meetings and reports Commentary around monitoring and review to align with the new Monitoring and Governance Topic Paper

## 2 National Policy context

### 2.1 Statutory National Park purposes and duties

2.1.1 There are two statutory purposes for National Parks, laid out in the Environment Act 1995:

- to conserve and enhance the natural beauty, wildlife and cultural heritage (of the National Parks); and
- to promote opportunities for the understanding and enjoyment of the special qualities (of the National Parks) by the public.

The 1995 Act also states that, in pursuing National Park purposes, National Park Authorities have a duty:

- to seek to foster the economic and social well-being of local communities (within the National Park) by working closely with the agencies and local authorities responsible for these matters.

Together these ensure that the sustainability principles underpin the work of the National Parks

### 2.2 National Parks Circular 2010

2.2.1 Requires that in furthering their statutory purposes the Parks give sufficient weight to socio-economic interests to fulfil their duty to sustain strong rural communities. This requires that they provide clear and consistent advice on what are acceptable forms of development. It states that:

*Para 78. The Authorities have an important role to play as planning authorities in the delivery of affordable housing. Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.*

*Para 79. The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term.*

### 2.3 National Planning Policy Framework

2.3.1 The 2018 NPPF makes specific mention of the National Parks in paragraph 172 where it states great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. It does not however exclude National Park Authorities from other requirements, including those relating to the provision of housing which are set out in Section 5: Delivering a sufficient supply of homes. The requirements in this section provide the underpinning framework for the housing policies in Local Plans, including in paragraphs 77 to 79, for its delivery in rural communities.

### 2.4 National Planning Practice Guidance

2.4.1 There is a wealth of guidance and advice within the National Planning Practice Guidance (NPPG) that is relevant to designing Local Plan policies for housing of all types and its

provision in rural areas. These are referred to in the individual subject areas within this topic paper.

## 2.5 High court judgements – affordable housing threshold

2.5.1 Reflecting the high levels of local need for affordable housing, the small size of development sites, historically, National Parks have set low thresholds to trigger on-site affordable housing contributions from small sites.

2.5.2 The Ministerial Written Statement - 28th November 2014 and associated amendments to the NPPG changed national policy. As designated rural areas National Parks were limited to taking affordable housing contributions as commuted sums on sites of 6- 10 units, nothing from smaller sites and only on-site contributions from schemes of 11 or more dwellings. The whole policy was challenged in the Courts with the Court of Appeal<sup>1</sup> concluding that the Written Ministerial Statement could become part of NPPG, but as a material consideration, not a blanket policy and not used to frustrate the operation of statute, i.e. the primacy of the Local Plan.

*“In our judgment, then, the policy stated in the WMS is not to be faulted on the ground that it does not use language which indicates that it is not to be applied in a blanket fashion, or that its place in the statutory scheme of things is as a material consideration for the purposes of s.38(6) of the 2004 Act and s.70(2) of the 1990 Act, and no more. It does not countermand or frustrate the effective operation of those provisions. The judge has, with respect, conflated what the policy says with how it may be lawfully applied<sup>19</sup>.”*

2.5.3 The Judgement also stated that an LPA could set its own site thresholds where there is needs and viability evidence to justify a departure from national policy.

*“Likewise if in the future an LPA submits for examination Local Plan policies with thresholds below those in the national policy, the Inspector will consider whether the LPA’s evidence base and local circumstances justify the LPAs proposed thresholds. If he concludes that they do and the local plan policy is adopted, then more weight will be given to it than to the new national policy in subsequent decisions on planning applications.”*

2.5.4 The revised NPPF has incorporated the Written Ministerial Statement, but with changes to the rural exception arrangements. Paragraph 62 states

*“Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*  
*a) off-site provision or an appropriate financial contribution in lieu can be robustly justified;*  
*and*  
*b) the agreed approach contributes to the objective of creating mixed and balanced communities.”*

And Paragraph 63

*“Provision of affordable housing should not be sought for residential developments that are not major developments [sites of 10 or more dwellings, or site area of 0.5 hectares or more], other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”*

2.5.5 National Parks are covered by the rural designation (S157, 1985 Housing Act). In combination these two paragraphs could be read as allowing National Parks to take an on-site affordable housing from sites of five dwellings or less.

---

<sup>1</sup> Court of Appeal Case No C1/2015/2559 - 11th May 2015

2.5.6 This, together with the Court of Appeal Judgement, provide the basis for Dartmoor National Park's approach to seeking affordable housing to meet its local housing needs.

2.5.7 The revised NPPF offers a further exception for National Parks in its policy for Entry Level Exception sites. In a footnote it states that "Entry-level exception sites should not be permitted in National Parks (or within the Broads Authority), Areas of Outstanding Natural Beauty or land designated as Green Belt"

## 2.6 *Funding for affordable housing*

2.6.1 Planning policy does not operate in isolation and this is particularly evident in policies for affordable housing. Levels and forms of capital subsidy have direct implications for the viability of schemes, the types of developer providing affordable housing, what constitutes affordable housing and the appetite amongst Registered Providers and developers to provide affordable housing, particularly on small schemes in rural areas.

2.6.2 This has been a policy area of significant shifts in direction and priorities since 2010. The most significant impact has been a reduction in capital grant funding, introduction of Affordable Rents and the requirement that Registered Providers cut their rents by 1% per annum over the period 2016 -20. These are gradually being reversed with funding again available for Social Rented and Affordable Rented homes and the introduction of the Home Builders Fund that includes provision for SME developers and for Custom and Self-Build projects. In December 2017 the Government announced an additional £60m a year over the next two years for Community Led Housing, since then Homes England has also launched other funding opportunities, including for social rented housing.

## 2.7 *Welfare reform*

2.7.1 The introduction of Universal Credit, together with a lower ceiling for the payment of Housing Benefit, has highlighted the financial vulnerability of some residents of affordable housing. Planning can potentially reduce the negative impact of these future changes through supporting the reform of tenure types, delivery models and construction techniques.

## 2.8 *The Right to Buy*

2.8.1 The Right to Buy is a government policy which gives secure tenants of councils and some Registered Providers the legal right to buy, at discount, the affordable home they are living in. Housing associations are able to voluntarily introduce the Right to Buy, but are not obliged to and do not generally do so on Dartmoor.

2.8.2 In designated rural areas<sup>2</sup>, such as National Parks, the right to buy has the potential to significantly undermine the stock of affordable housing in areas where there is limited scope to replace it, due to the area's highly constrained nature. This means that over time it becomes increasingly difficult to meet an area's affordable housing need.

2.8.3 Where relevant bodies do decide to introduce the Right to Buy Section 157 of the Housing Act 1985 provides that local authority and housing association landlords in designated rural areas, such as National Parks, can impose certain limitations on the subsequent disposal of homes acquired under the Right to Buy scheme.

2.8.4 There are two permissible forms of restriction that may be imposed, where a tenant buys a dwelling-house in a designated rural area in pursuance of rights under Part 5 of the Act, the landlord may choose to impose a covenant limiting the freedom of that person (and his

---

<sup>2</sup> <https://www.local.gov.uk/sites/default/files/documents/rural-designated-areas-735.pdf>



successors in title) to dispose of it. There are two permissible forms of restriction that may be imposed, landlords can either:

- require that their written consent is obtained before a relevant disposal is made; or
- require people who have bought their home under the right to buy and wish to dispose of it within ten years of their original purchase to first offer it back to their former landlord for purchase at full market value (right of first refusal).

2.8.5 The landlord's written consent to a disposal shall not be withheld if the disposal is to a local person who for the previous three years has lived or worked within a region designated by the Secretary of State which, or part of which, includes the designated rural area.

2.8.6 Where the right to buy is introduced this process effectively ensures there is always scope for affordable housing in the National Park to be retained for local people in perpetuity. However, there is equally still scope for loss. The National Park Authority work closely with the Housing Authorities of relevant District Authorities and Housing Associations to ensure a sustainable approach to meeting housing needs is continued.

### 3 Introducing the Local Context

#### 3.1 *Capacity for change: sensitivity and constraint*

3.1.1 The importance and sensitivity of National Parks is recognised at a national level through the Environment Act, National Parks Vision and Circular, and NPPF, as described above. Locally, DNPA has a range of evidence which it gathers in order to understand sensitivity to development, and the potential impact of change at the landscape, settlement and site scale. Key evidence includes:

- **Landscape Character Assessment.** This study highlights the importance of the landscape and tranquillity Special Qualities of Dartmoor National Park. Placing Dartmoor in its regional and wider context its notes key drivers for change, including development pressure within and surrounding the National Park, and for each Landscape Character Type identifies Valued Attributes and Forces for Change.
- **Landscape Sensitivity Assessment.** This Assessment notes "At a more strategic level, the Assessment demonstrates an overall sensitivity to development of the Dartmoor landscape surrounding the main settlements. The Assessment focuses on what are likely, in planning policy terms, to be considered the most appropriate locations for development. The study is one of sensitivity, not of capacity, but what may be concluded from the assessment is that there exists a level of sensitivity in the National Park context which limits the capacity for change or growth even in its most sustainable locations. This may provide helpful evidence when considering development opportunities in a sub-regional context."
- **Habitat Regulations Assessment.** Dartmoor has extensive European habitat designations within its boundary (Dartmoor SAC – 23,158 Ha, South Dartmoor Woods SAC – 2,159 Ha, and the South Hams SAC – 126 Ha). This Assessment will take place at each formal stage in the preparation of the Local Plan, seeking to ensure that development does not have significant adverse effects on the integrity of these European protected sites.
- **Infrastructure Delivery Plan.** This Plan ensures that the Local Plan process understands and takes into account infrastructure capacity and requirements. This may

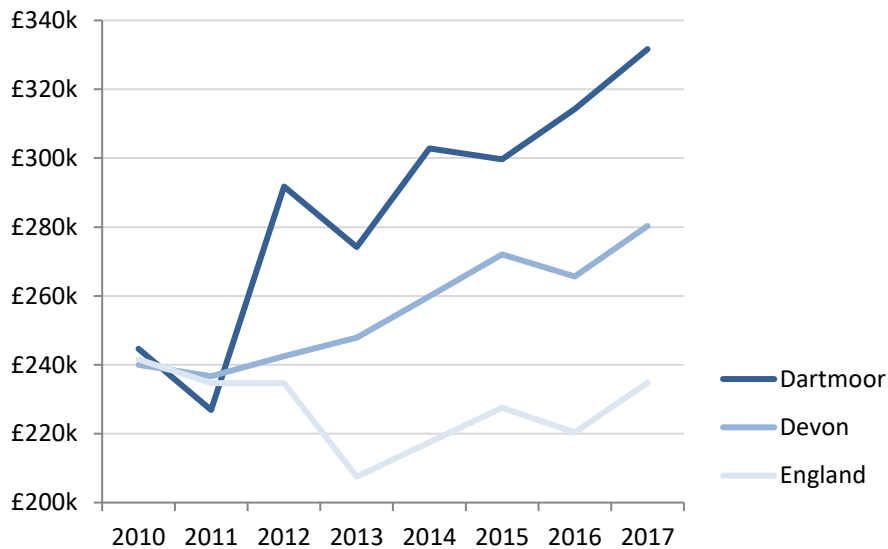
include, for example: highways and parking, education and health, sewerage, water, and other utilities.

- **Environment Report** (Sustainability Appraisal/Strategy Environment Assessment). This Report will undertake assessment at each formal stage in the preparation of the Local Plan, ensures the policies within the Plan, alone and in terms of how they interact with others, contribute positively towards a comprehensive range of Sustainability Objectives.

These pieces of evidence strongly support the national policy context and clearly indicate the need for a measured and balanced approach to development in Dartmoor National Park. This must be taken into account in the consideration of Dartmoor in its strategic housing context, its sensitivity to change and therefore the strategic priorities for the Local Plan and housing delivery in the National Park.

### 3.2 House prices

3.2.1 House prices are a key policy driver. Average house prices in the National Park have been increasing and in 2017 they reached £331,651, 15% above Devon’s average (£280,320) and 29% above the national average (£234,794), see Figure 1.



**Figure 1 - Average House Prices**

3.2.2 The trend for higher than average house prices has a significant impact on house affordability in the National Park, especially for those working in the National Park. Housing Affordability ratios measure the ratio between median house prices and median earnings and provide an indication of the relative affordability of the housing stock for those working or living there. The ratio can be calculated by either using the earnings of residents or of workers, both provide an insight into the housing experience of Dartmoor’s communities. Although detailed earnings data is not available for the National Park, it can be accurately estimated by averaging earnings ASHE (Annual Survey of Hours and Earnings) data for the constituent District Authorities which are generally considered consistent with Dartmoor’s earnings.

#### **Median Workplace-based earnings**

South Hams: £23,507

West Devon: £20,792

Teignbridge: £21,803

Average median earnings for three districts: £22,034

Median Dartmoor house price: £272,000

**Workplace affordability ratio: 12.34**

**Median Residence-based earnings**

South Hams: £27,276

West Devon: £22,757

Teignbridge: £23,401

Average median earnings for three districts: £24,478

Median Dartmoor house price: £272,000

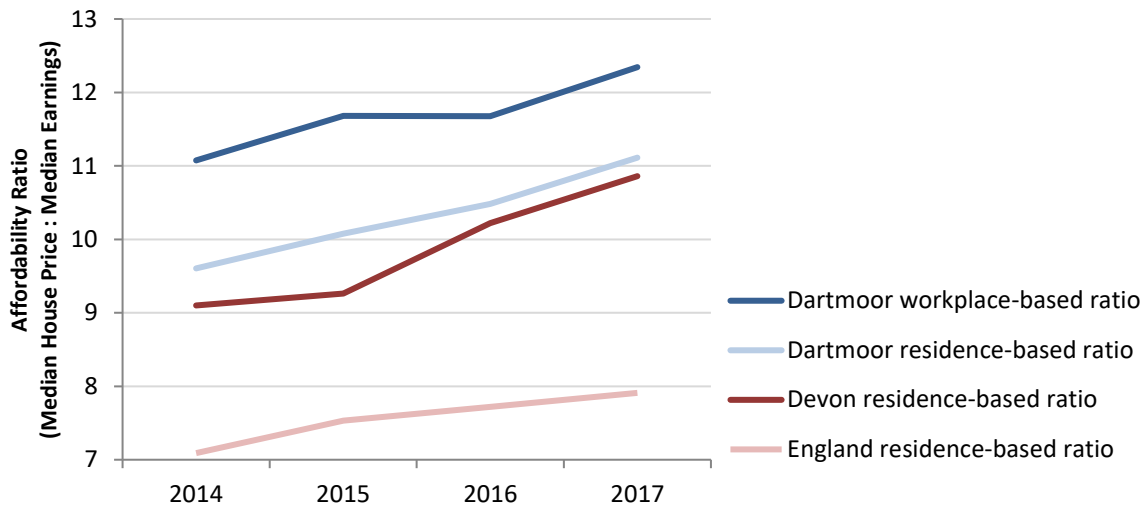
**Residence affordability ratio: 11.11**

- 3.2.3 Using this methodology Dartmoor's 2017 housing affordability ratio was 12.34 for workplace-based earnings (£22,034 : £272,000) and 11.11 for residence-based earnings (£24,478 : £272,000). The workplace-based ratio provides a good picture of the difficulties faced by many who work in the National Park and make contributions to the economy, landscape and their communities. To put this into perspective nationally, comparing workplace-based earnings, in 2017 Dartmoor National Park was the 55<sup>th</sup> most unaffordable of 326 Local Authority areas in England. If London is discounted Dartmoor becomes the 28<sup>th</sup> most unaffordable such area. To put this into perspective internationally, the Demographic International Housing Affordability Survey<sup>3</sup> categorises the Devon and Plymouth housing market as severely unaffordable, the most severe category, and 253<sup>rd</sup> most unaffordable area of the 293 studied in the US, Canada, Australia, China, New Zealand, Ireland, Japan, and Singapore. Given Dartmoor's affordability ratio is significantly higher than Devon and Plymouth's the unaffordability issue cannot be understated. Significantly, Homes England Affordable Housing Programme prospectus (addendum) identifies South Hams, Mid Devon, West Devon and Teignbridge, as being within the scope of social housing funding given their high affordability ratio<sup>4</sup>.

---

<sup>3</sup> 14<sup>th</sup> Annual Demographic International Housing Affordability Survey 2018, London School of Economics <http://demographia.com/dhi.pdf>

<sup>4</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/720467/SOAFP\\_Addendum\\_-\\_Social\\_Rent\\_-\\_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/720467/SOAFP_Addendum_-_Social_Rent_-_Final.pdf)



**Figure 2 - Housing Affordability (median house price : median earnings)**

### 3.3 Wider 'Housing Market Areas' context

3.3.1 The National Park sits within the boundaries of four local authority areas: Mid Devon, South Hams, Teignbridge and West Devon. In turn, these local authorities are defined as being within two strategic Housing Market Areas (HMA). The Plymouth housing market area includes those parts of West Devon and South Hams which are inside the National Park. The Exeter housing market area includes those parts of Teignbridge and Mid Devon which are inside the National Park.

3.3.2 The majority of the population live in towns and villages. DNPA identifies 8 local centres, only two of which have populations of above 3,000 – Ashburton and Buckfastleigh. The other six (Chagford, Horrabridge, Moretonhampstead, Princetown, Yelverton and South Brent) have populations of between 1,000 and 2,500. There are a large network of active villages and small settlements distributed between 50 parishes which lie wholly or partly within the National Park.

3.3.3 DNPA has worked together with its partner authorities within the respective HMAs to understand the housing needs of the National Park within the context of the two HMAs. This is in accordance with NPPF and Planning Policy Guidance, and in particular the policy approach to understand "Objectively Assessed Need" for housing at that time.

3.3.4 This Topic Paper draws largely from evidence prepared by Three Dragons and Associates working for DNPA, and takes into account key evidence of housing need in the wider context, including:

- Dartmoor National Park Demographic Forecasts, Edge Analytics (October 2016) Three Dragons Technical Analysis Report: reviewing the Objectively Assessed Need and Local Housing Needs data (2018)
- Plymouth & SW Devon Joint Local Plan SHMA Part 1: the Housing Market Area and Updating the Objectively Assessed Need, Peter Brett Associates
- Plymouth and SW Devon Joint Local Plan Housing topic paper (Provision and Supply) March 2017
- Exeter Housing Market Area Strategic Housing Market Assessment: Interim technical report 2018 to 2040 (September 2017)
- Greater Exeter economic needs assessment, Hardisty Jones Associates 2017

It then takes into account subsequent policy change relating to the establishment of housing

need and local plan targets arising from the 2018 NPPF and associated guidance.

## 4 Analysis of Housing Need and Supply

### 4.1 Analysis of housing need

- 4.1.1 The policy approach to National Parks and their statutory purposes sets out that the National Park is not generally a suitable location for unfettered market housing development. Dartmoor National Park's current Local Plan policies instead facilitate housing delivery in order to support local needs, subject to the landscape capacity to do so and the wider objectives of the National Park. An initial important question in this context, is therefore whether it is necessary to undertake detailed analysis in order to understand housing need at a strategic level, in order to inform the preparation of the National Park's Local Plan.
- 4.1.2 The 2018 NPPF and associated guidance brought about a shift from locally prepared housing needs assessment (Strategic Housing Market Needs Assessment) to derive an Objectively Assessed Need (OAN) which informed local plan preparation. Instead government has published a national standard method in the NPPG and associated further guidance. The standard method set out below identifies a minimum annual housing need figure.
- 4.1.3 Whilst it is not mandatory, the NPPG states "if it is felt that circumstances warrant an alternative approach [but] authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances." (Paragraph: 003 Reference ID: 2a-003-20190220)

Significantly, the product of the standard method does not include National Parks and NPPG states:

*"Where strategic policy-making authorities do not align with local authority boundaries, such as National Parks and the Broads Authority, available data does not allow local housing need to be calculated using the standard method set out above. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels."*

- 4.1.4 It is therefore clear that 'exceptional circumstances' do exist, and that it is for DNPA to determine an appropriate and proportionate approach to understand housing need, on the basis of the government advice and taking into account the statutory and national policy context described above.
- 4.1.5 The new NPPF also requires strategic policies to apportion an authority's overall housing need figure for the purposes of neighbourhood planning areas.
- 4.1.6 Government altered the established method to understanding housing need whilst DNPA has been preparing housing needs evidence. As part of the commission on housing analysis, DNPA therefore sought advice from Three Dragons and Associates on the potential impact of the Ministry of Housing Communities and Local Government (MHCLG) housing need numbers and the appropriate approach to understanding need. The approach

taken is considered to be reasonable and defensible on the basis of the advice of Three Dragons and Associates.

- 4.1.7 The approach followed is to undertake analysis which enables DNPA to have a reasonable understanding of housing need, with a 'sense check' against the work previously carried out for the two constituent HMAs, and the standard methodology. Ultimately though, whilst it will be helpful to understand unconstrained or 'policy off' need, it would clearly be reasonable for DNPA to respond to that need in a way based upon its statutory, national policy and local context. There is therefore an element of blurring between policy on and policy off, though the below seeks to describe the objective approach to housing needs assessment, the market signals taken into account, and the way in which this would then be taken forward in strategic policy. Importantly, recognising also the constraints in respect of data availability, Three Dragons have not attempted to provide an OAN for Dartmoor National Park, but to provide proportionate and defensible modelling and analysis which establish a reasonable understanding in the National Park context, as described above.
- 4.1.8 An understanding of the full extent of housing need which does not impose any possible constraints on future housing supply, "policy-off", does have a number of benefits, even if it is an indicative figure or figures, rather than a formal housing target. Importantly, it will assist in working with neighbouring authorities through the Duty to Co-operate and understand how Dartmoor housing need could be delivered between the two HMAs. In addition, a consideration of the alternative scenarios for calculating housing need is inextricably linked with the development of wider policy objectives and the future sustainability of the National Park area.
- 4.1.9 The previous established approach of preparing an Objectively Assessed Need (OAN) was designed to calculate future overall housing need, making use of household projections with adjustments for mid-year Office for National Statistics (ONS) population projections, past delivery rates, market signals and future jobs growth. Affordable housing would be a component of overall housing need.

## 4.2 *The Plymouth and Exeter Housing Market Areas (HMAs)*

- 4.2.1 As Dartmoor National Park is split between two HMAs and both have joint / strategic plans in preparation, Three Dragons and Associates reviewed the approaches taken by both HMAs.
- 4.2.2 The Plymouth and South West Devon Joint Local Plan completed an update of Objectively Assessed Need (Peter Brett Associates 2017<sup>5</sup>), a detailed affordable housing OAN (HDH consulting<sup>6</sup>) and a subsequent housing topic paper (provision and supply) March 2017<sup>7</sup>.
- 4.2.3 The Greater Exeter Strategic Plan (GESP) is not as advanced but has recently issued a Strategic Housing Market Assessment: Interim technical report, 2018 to 2040 which seeks to update the OAN (September 2017). This has been prepared in-house by Devon County Council (DCC).
- 4.2.4 The studies between the two HMAs had some commonality in the use of DCC popgroup model to produce population and household projections. They both use 2014 Sub National Population Projections as a baseline to formulate household projections and historic local

---

<sup>5</sup> <https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart1.pdf>

<sup>6</sup> <https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf>

<sup>7</sup> <https://www.plymouth.gov.uk/sites/default/files/HousingTopicPaperProvisionSupplyUpdated.pdf>

migration data. However, there are a number of differences in approach by the HMA areas, throughout the OAN calculation. These included:

- The Plymouth HMA selected a preferred local scenario of 10 years, which produces a higher level of growth than reliance upon the Sub-National Population Projections (SNPP) 2014 baseline<sup>8</sup>. Given their fluctuating migration patterns, Exeter concluded that a 20 year trend period better takes account of their economic cycles than a 5 year trend
- A vacancy rate is applied to household population projections to convert household growth into a dwelling requirement. Both HMAs considered data on vacant dwellings derived from the 2011 census alongside MHCLG and Council tax records on vacant dwellings and second homes. In some parts of both HMAs, there are elevated levels of second homes which results in a higher vacancy rate. The Exeter HMA and Edge Analytics household projections have applied a uniform vacancy rate across each LA area. In the Plymouth HMA, the model applies a differential vacancy rate to reflect elevated LA levels of second homes, especially for South Hams where it is 14%.
- In Plymouth, the 10 year migration trend for the HMA increases the HMA population by 7,700 more than the baseline economic projection for job growth commissioned from Experian. The study therefore concludes that there is no economic case for uplifting their demographic scenario further. The Exeter HMA has proposed the adoption of one of the alternative employment forecast scenarios and the highest level of job growth. This results in an employment based dwelling projection of 2,500 homes per annum.
- Each HMA has made different assumptions and responses to adverse market signals. Exeter has not applied any uplift for affordability, whereas Plymouth have applied significant uplifts especially in the district LA areas of South Hams (25%) and West Devon (20%) to reflect house price to income ratios in excess of 8. However, Plymouth has not considered any uplift to reflect the levels of affordable housing need, whereas Exeter have included an additional modest annual dwelling uplift for overcrowded households and a 6% flex to reflect delivery performance of 6% below average compared with plan targets across the HMA.

#### 4.2.4.1 Historic Delivery ('policy on')

4.2.5 Table 1 below shows housing delivery rate in Dartmoor National Park for the last 10 years. It shows an average of 73 dwellings per year across the previous 10 years, and a delivery rate of 50 per year since the adoption of the Core Strategy in 2012. The Core Strategy established an indicative delivery rate of 50 dwellings per year.

**Table 1 – Housing delivery in Dartmoor National Park**

	Bit 07/08	Bit 08/09	Bit 09/10	Bit 10/11	Bit 11/12	Bit 12/13	Bit 13/14	Bit 14/15	Bit 15/16	Bit 16/17	Bit 17/18	Bit 18/19
<b>Built/year</b>	89	90	48	82	44	41	49	69	36	53	49	66

<sup>8</sup> <https://www.ons.gov.uk/releases/subnationalpopulationprojections2014basedprojections>

- 4.2.6 The distribution of development in the last 10 years has seen 46% within the Exeter HMA (Teignbridge District), and 54% with the Plymouth HMA (South Hams and West Devon).
- 4.2.7 DNPA indicated that it had historically seen a level of development within the Plymouth HMA which transposed to 600 dwellings within the National Park part of that area across the Plymouth Joint Local Plan period. It is important to note that this figure is a proportion of the previous OAN calculation, which has already been adjusted to take account of a significant market signals uplift for the South Hams and West Devon. DNPA clarified in representations to the Plymouth Joint Local Plan that this figure represents an indicative level of delivery which would be anticipated within that part of the National Park, and therefore contribute towards meeting the housing need for that HMA. However it does not commit the Local Plan for the National Park to deliver at that level, nor does it indicate that the National Park will provide for housing growth beyond that which it may identify as meeting the local need within the National Park, taking into account environmental constraint. It is recognised, though, that it is important to understand the contribution Dartmoor makes towards the overall delivery in the HMA. This, together with a proposed monitoring framework which takes this into account, is described in more detail at 5.4.

### 4.3 *Edge Analytics Forecasts*

- 4.3.1 DNPA also considered a simple dwelling-led approach to understanding housing need. Whilst this is a clearly different approach to the traditional OAN methodology, and thus is not put forward as an objective assessment, this aids understanding in more of a 'policy on' context.
- 4.3.2 This method involved modelling demographic forecasts to better understand how housing delivery could affect the National Park's demographic make-up. The demographic forecasts were prepared by Edge Analytics in October 2016. The modelling set out 7 growth scenarios. The benchmark model is disaggregated for the National Park area from the Sub-National Population Projections (SNPP)-2014<sup>9</sup>. Whether it is necessary to revise these figures with later data releases will be reviewed as the plan progresses. For comparison with the derived SNPP-2014 scenario, historic population trends data were used to develop 3 trend scenarios of migration assumptions for 6, 10 and 13 years prior to 2014. These scenarios underline some of the demographic challenges facing the National Park with potential for the population to decline, an ageing population and a reduction in the number of all household groups under 64 up to 2035. For this reason, Edge included a further 3 scenarios for a defined housing growth trajectory based upon historic delivery rates of 50 and figures of 80 as above historic levels and 30 as being below. It is only in employing the

---

<sup>9</sup> <https://www.ons.gov.uk/releases/subnationalpopulationprojections2014basedprojections>



scenarios for a delivery rate of 50 and 80 units that the higher level of positive net internal migration is able to reduce the rate of ageing.

- 4.3.3 Whilst this approach is not strictly a housing need calculation it very clearly aids in informing the policy response to need but providing insight into the potential outcome of levels of housing delivery.

#### 4.4 *Strategic Housing Market Areas (SHMAs)*

- 4.4.1 The analysis carried out by Three Dragons and Associates considered how a dwelling number might reflect a proportionate share of the SHMAs need. The Greater Exeter technical review of the SHMA and OAN is in draft form. Additionally, their proposals are that there will be no allowance for needs within the HMA to be met within the National Park. It is assumed that housing delivery within the NPA will be included within the 6% flex in the housing number for windfalls, allocations etc. For these reasons, the scenarios prepared by ORS to inform the Three Dragons and Associates advice looked at need as a share of the Plymouth and SW Devon HMA overall and a share of the constituent authorities – West Devon and South Hams and then extrapolate these to the rest of the National Park Area (percentage of dwellings in Dartmoor which are in the Plymouth and South Devon HMA, multiplied by the total OAN for the area then the proportion of households in Dartmoor in the Exeter HMA and scaled the Dartmoor in Plymouth HMA figures up to reflect this).

#### 4.5 *Vacancy rates*

- 4.5.1 MHCLG household projections do not take account of vacancies within the dwelling stock. To convert household projections into any dwelling requirement requires an upwards adjustment for empty dwellings “the vacancy rate”.
- 4.5.2 Because the modelling within the OANs has already applied vacancy rates to the household projections, the ORS additional modelling for the NPA works with the dwelling growth forecasts. OAN scenarios in this report, therefore, assume that vacancy rates are already taken into account and are not adjusted for again.

REF	MODEL	2015-35 dwelling growth	Annual dwelling growth	Strengths (inc policy off and policy on)	Weaknesses (inc policy off and policy on)
EA2c	Edge analytics long term migration trend at 23 dwellings pa at 30% market signals (13 years)	598	30	Uses localised migration flows and treats the needs of the NPA as distinct from the wider area. Makes the Edge scenario policy compliant with a market signals uplift	Results in continuing declining and ageing population based on current trends but this could/should be addressed through converting the OAN into a policy-on Local Plan target. At levels this low, difficult to address specific types of need or uplift for market signals. Won't comply with Plymouth joint local plan distribution strategy to accommodate 600 dwellings
POn2	Edge analytics dwelling led approach at 50 dwellings pa	440 560	22 pa (Exeter) 28 pa (Plymouth)	Broadly meets the Plymouth JLP distribution strategy and Exeter HMA Will prevent population decline, maintained at current levels Deliverable and consistent with current housing target	Not compliant with the OAN methodology as it takes supply into account Doesn't reflect Greater Exeter OAN proposal not to meet housing need within the NPA. Would not address any need to rebalance an aging population.
EA1a	Edge analytics SNPP 2014 at 73 dwellings pa with 10% market signals uplift	1,606	80	Makes the Edge forecast policy compliant with lowest level of market signal uplift Would halt population decline	Neither the Plymouth nor Exeter SHMAs use SNPP in their OAN calculations. Using Dartmoor's share of SNPP wouldn't be consistent. Using this forecast is not consistent with local population characteristics.

Table 2 Summary of different levels of housing need

## 4.6 Job growth and economic forecasts

- 4.6.1 Previously, Planning Practice Guidance (PPG) described how employment growth can be taken into consideration when calculating housing need.

*“The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher than the figure identified by the standard method.*

*Where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. This will be an uplift to identify housing need specifically and should be undertaken prior to and separate from considering how much of this need can be accommodated in a housing requirement figure.” (Reference ID: 2a-010-20180913)*

- 4.6.2 It required that job and economic growth were taken into account in considering housing need and overall housing numbers. “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area”. It therefore emphasises that such assessments should be undertaken at Housing Market and not local planning authority level.
- 4.6.3 In response, both HMAs (Plymouth and Greater Exeter) included and tested a range of economic forecasts at HMA level. Bespoke forecasts were commissioned using the preferred demographic projections as key inputs (in the case of both HMAs, local migration projections prepared by Devon County Council using popgroup software). Work by Experian commissioned by Peter Brett Associates (for the Plymouth HMA) confirms that both population and employment models used consistent assumptions which link employment to population (participation rates, double jobbing commuting etc).
- 4.6.4 For the GESP area, a series of similar employment-based housing projections were commissioned by Hardisty Jones. A series of additional, employment forecast scenarios were also produced following stakeholder discussions and reflected positive outlooks for certain sectors. The HMA is recommending the adoption of one of the alternative scenarios reflecting the highest level of job growth. This results in an employment based dwelling projection of 2,500 homes per annum.
- 4.6.5 As part of the Hardisty Jones study for the GESP, additional work and outputs were commissioned for the whole national park geography, not just that element within the Exeter HMA area. Key points of the National Park Authority element of the study are as follows:
- The National Park Authority’s economic aspirations are centred on supporting appropriate economic growth rooted in the quality of landscape and place, increasing productivity through the development of the National Park productivity network and Rural Enterprise Zone, increasing international tourism, and further developing a strong food and drink offer.
  - Experian forecast an increase in employment of 1,060 over the period 2015-40, a 10% increase. Over the same period Cambridge Econometrics (CE) forecast

growth of 2,400, 24% growth. Differences in growth forecasts for the construction sector are a large part of the difference between the two forecasts overall.

- A hybrid or average scenario has been prepared using the two baseline forecasts. This provides a ‘middle ground’ taking account of the differing expectations and modelling approaches used by the two forecasters.
- The hybrid scenario forecasts growth of 2,200 net additional jobs over the 25- year period. This equates to approximately 85 jobs per annum. This equates to around 18% growth over the entire period.
- A significant finding is that the largest growth in employment is within those activities which are either home based or do not require direct provision of space (e.g. itinerant workers), see Table 3.

**Table 3 Employment change home based or itinerant workers (based on FTE jobs), Hardisty Jones Associates, 2017**

	Experian	Cambridge Econometrics	Hybrid
Home based and itinerant worker activities	330	1,110	720
TOTAL ALL SECTORS	1,070	2,390	1,730
Percentage of all sectors	31%	46%	42%

- 4.6.6 Clearly, increases in employment would be expected to have an impact on demographic projections locally because jobs need to be filled by labour. A net increase in employment could therefore better retain a local workforce, reducing local outmigration or additionally lead to an increase in the in-migration of labour. Conversely, an aging population and shrinking work-age age population could have the effect of dampening forecasted economic growth as businesses and employers struggle to access the labour and skills necessary to grow. In considering how the DNPA may respond to the forecasts, the following points need to be borne in mind.
- 4.6.7 Whilst the Hardisty Jones study provided a separate estimate for the DNPA, the PPG and Planning Advisory Service (PAS) national guidance, prior to adoption of the 2018 NPPF, were clear that job and economic growth forecasts should be conducted at HMA area / functional economic areas and not individual districts or planning authorities. Many people travel to work across these administrative boundaries so planning for each individually will not produce the most sustainable balance of jobs and homes. As such, it is considered this approach continues to provide the most appropriate and reasonable approach for forecasting job and economic growth. Of course, the estimate is for the whole National Park area, covering both HMAs.
- 4.6.8 In examining the housing implications of additional economic growth within the National Park, it will be important to consider the extent to which the anticipated additional growth does indeed result in an additional dwelling requirement. For example, the potential scope for recalling commuters could reduce any dwelling requirement. Census data in relation to commuting flows included in the Edge Analytics work show the National Park as an area with a net out-commute ratio of 1.24 (apart from South Hams which shows a net in-commute at a ratio of 0.92). However, it may nonetheless be the case that 63% of people who work in the National Park also live there. 50% of those resident in the National Park work there, but a further 23% work in the rest of the constituent local authority areas (South Hams, Teignbridge, West and Mid Devon).

- 4.6.9 Additionally, with over 30% of growth forecast to be from those individuals working from home, it could be considered that these needs will already be accommodated within the existing dwelling stock. Indeed, there is uncertainty as to whether there will be sufficient local workers to service a jobs growth of close to 100 FTE annually. The demographic analysis of the National Park (based on SNPP 2014 household growth by age of household representative) shows a decline in all age groups within the working age population. Only those age groups of 65 and above show positive growth with very pronounced growth amongst those aged 85+ of 141% over the plan period.
- 4.6.10 Finally, as the PAS guidance note makes clear “regardless of the detail, before using any job forecast the housing need assessment must be clear about the future population (numbers and age profile) that is incorporated in the forecast”. With so many options for establishing a housing number to consider, the basis for household growth ought first to be established in broad policy terms.
- 4.6.11 To fit the demographic projections to economic activity rates and then assess how many more dwellings are needed in the area would be a significant piece of work. Given:
- National guidance on employment growth is now superseded with the adoption of the Standard Methodology
  - The nature of the projections, being derived from national data and not apportioned in detail to the National Parks employment sectors
  - The position of both strategic HMAs in having already taken this area into account in their previous SHMNAs
  - The need for a proportionate evidence base
  - The policy decisions the NPA may wish to make about the demographic projections
- it is considered unnecessary to undertake further analysis.

#### 4.7 *Market Signals*

- 4.7.1 Earlier planning practice guidance (PPG) required that: “the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings”. The market signals referred to within the PPG included price signals:
- a) land prices
  - b) house prices rents and affordability
  - c) delivery / rate of development
  - d) homeless and overcrowding.

With regard to the new standard methodology the PPG no longer refers to market signals in the context of calculating need, but does include an affordability adjustment. Consideration of this in the context of Dartmoor is described below.

#### 4.8 *Understanding affordable housing need*

- 4.8.1 It is important to note that under the previous approach to the calculation of an OAN for a HMA, the need for affordable housing is derived from a different calculation. Subsequent guidance then set out:

*“Strategic policy-making authorities can establish the unmet (gross) need for affordable*

housing by assessing past trends and current estimates of:

- the number of homeless households;
- the number of those in priority need who are currently housed in temporary accommodation;
- the number of households in over-crowded housing;
- the number of concealed households;
- the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and
- the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”

(Reference ID: 2a-023-20180913)

4.8.2 The most recent guidance states:

*“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.*

*The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*

(Paragraph: 024 Reference ID: 2a-024-20190220)

4.8.3 Fundamentally, the affordable housing calculation includes current need. Importantly this often includes existing households living in existing homes which are unsuitable. Even if a household’s need must be met by moving to a new home, the vacancy created by their move is freed up for another household thus netting off the need for an additional home. This approach therefore remains consistent with that described above. The Tables in Appendix 1, together with the summary table at 4.9.4 set out the estimates of affordable housing need undertaken by Three Dragons.

4.8.4 For the purposes of a calculation for the National Park, affordable housing assessment has four key stages;

- i. Estimating those currently in need
- ii. Adding an estimate for future need which is expected to arise over the plan period (taking into account those new households unable to afford the lowest entry level price for market housing)
- iii. The current and future supply of affordable housing is then deducted to determine net housing need
- iv. Typically this is then converted into an annual flow

4.8.5 With regard to the two SHMNAs it is relatively easy to update and remodel the calculations of current affordable housing need, derived as they are from a build-up of local demand and supply data from the housing register and HCA records.

#### 4.9 *Understanding the current local market and housing need*

4.9.1 PPG states “Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)”  
Paragraph: 019 Reference ID: 2a-019-20190220

- 4.9.2 In respect of Dartmoor's affordable housing needs calculation, local housing need data have been derived from the housing register. Such secondary data sources are typically incomplete and contain both gaps and user errors which affect their reliability. In particular, all are self-assessments of housing need and the level of need and other aspects of eligibility especially local connection are only verified once a potential dwelling is available. Further consideration of specialist housing and input from the health and social care sector is described at 6.2.
- 4.9.3 Housing register material is frequently employed in housing needs assessments. However, it is recognised that it is more difficult for a National Park Authority to rely upon data without qualification, given our primary objective is to meet local need and not provide for a share of need in the wider housing market. In recognition of this, Three Dragons have subjected the available housing needs data to some additional adjustments to try to determine a *defensible minimum* local need estimate. It is worth noting that of the 4,254 bids made for properties advertised within the National Park since July 2014 but declined, 27% were refused because the applicant did not meet the local connection or section 106 eligibility criteria (Source: Devon Home Choice). This suggests that the requirement for eligibility assessment is applied robustly by the relevant landlord.

#### 4.10 *Affordability*

- 4.10.1 Calculations for affordability have typically employed some of the key variables discussed below.

A key challenge in reviewing affordability for the National Park is that there are data limitations both in relation to incomes and entry prices. A best-fit affordability ratio for the National Park is nevertheless calculated and discussed in section 3.2. Expanding on affordability, there is information available on housing costs, and on incomes, explored further below.

#### 4.11 *Housing costs data*

- 4.11.1 House price data for the National Park Authority area is available through Land Registry sales records. In 2018 the median house price within Dartmoor National Park was £220,000. This has fallen from £272,000 in 2017. Alongside this there has been a significant fall in the number of sales (-54%). Given the small number of sales (and particularly small in 2018) the average house price can be highly sensitive to change. However it is important this continues to be monitored for long term trend, and the degree to which the housing market will react to national/international factors over the coming year, and beyond
- 4.11.2 In order to test entry level affordability across a range of household types, lower quartile prices for the dwellings by bedroom numbers are required. Land Registry only collect data on house types, not sizes, and there are no secondary data sources for this - it tends to be collected through on-line surveys, as in previous SHMA studies.
- 4.11.3 The most affordable market tenure in the National Park is market renting (the lowest rents in the constituent housing authority LAs require a minimum income of £14,571 compared with minimum incomes for the equivalent lower quartile house prices of £45,700). Using private rent data from the Valuation Office Agency is therefore a way to establish affordability for household sizes / bedroom numbers. Data by dwelling type and bedroom number is available, see Table 4. However, this is not available below local authority level. This information can only be obtained by survey work within the NPA, usually telephone surveys with agents.

**Table 4 – Housing costs and income levels in constituent Housing Authority areas**

	1 BED RENT (£)	INCOME (£)	2 BED RENT (£)	INCOME (£)	3 BED RENT (£)	INCOME (£)	4 BED RENT (£)	INCOME (£)
LQ MID	400	13714	550	18857	650	22286	825	28286
LQ SOUTH HAMS	490	16800	595	20400	750	25714	950	32571
LQ TEIGNBRIDGE	450	15429	600	20571	700	24000	920	31543
LQ WEST DEVON	425	14571	550	18857	650	22286	895	30686
MED MID DEVON	450	15429	595	20400	715	24514	950	32571
MED SOUTH HAMS	518	17760	650	22286	825	28286	1100	37714
MED TEIGNBRIDGE	495	16971	650	22286	775	26571	1000	34286
MED WEST DEVON	460	15771	575	19714	725	24857	995	34114

*VOA data, assumes 35% of gross income is spent on rent (2017)*

#### 4.12 Income Data

- 4.12.1 There are two main data sources for income data. CACI paycheck provides income at postcode level for household. However, this is paid-for data and has some limitations, not least that it is derived from credit reference scores and includes unearned income. The other source is Annual Survey of Hours and Earnings (ASHE) which is freely available and published by ONS. Data can have sampling errors even at LA level and does not go below this geography. It can be workplace-based data, based on where an employee works, or residence-base, based on where an employee lives. The data does not account for all income, it is drawn from a sample of HM Revenue and Custom Pay as you Earn (PAYE) records and therefore cannot include income recorded through Self-Assessment (including self-employment, property rental and investments). Earnings from part-time workers are also not included.
- 4.12.2 Both housing registers – Help to Buy SW and Devon Home Choice collect income data. However, it is self-populated and, given that it is a register of housing need, does not provide the full range of incomes within an area. In assessing the percentage of households able to access/afford alternative types of tenure, CACI is also the only data source which provides a full income distribution.
- 4.12.3 Without commissioning specific income data either through CACI paycheck or a similar model and undertaking sample surveys for house prices by bedroom size or rents within the National Park, it is not possible to produce a bespoke affordability assessment for the NPA. However, there are a number of options for filling data gaps.

Options are:

- Rely on historic data which was commissioned and NPA geography.
- Produce a combined set of data from the four local authorities and current HMA data.
- Use HMA level calculations on newly arising need within the OAN (and the proportions of the housing number which needs to be delivered as affordable) and combine these with



detailed analysis on current need from the housing register and help to buy to determine tenure and house types for developing policy.

- Use the simple spreadsheet model within the GESP OAN calculations, which is up to date and built upon secondary data. Populating this model could provide a useful baseline.

4.12.4 On balance, using HMA level income distributions and affordability calculations for completing the overall affordable housing needs assessment is considered reasonable and proportionate.

#### 4.13 *Local Housing Need evidence*

Proposals for the development of affordable housing needs to demonstrate they will meet a local housing need, normally evidenced by a local Housing Needs Assessment (HNA). Currently within Dartmoor National Park these Assessments are carried out by or in conjunction with the relevant local housing authority and with the Rural Housing Enabler (RHE) at Devon Rural Housing Partnership<sup>10</sup>. Housing register data, such as from Devon Home Choice, is 'live' data. However, it is only considered sufficiently robust to justify small-scale windfall development, with larger housing proposals requiring other supporting evidence to justify them. This is because scrutiny of applicants takes place upon allocation of properties, rather than application to the register, and because Devon Home Choice data does not have sufficient geographic detail to explore the current Local Plan expectations that occupiers should have a local connection. Home Choice data may, however, provide sufficient evidence to initiate additional local housing needs assessments. HNAs can identify the need for:

- affordable housing to rent;
- affordable housing to buy;
- downsizing;
- self-build;
- adapted and/or housing with care support.

4.13.1 The HNA report may also draw on information from Devon Home Choice, the Self Build Register, and Help to Buy South West to ensure that those already registered are counted as having a need. HNAs have a limited shelf-life, typically 3-5 years. Recognising the time it can take to bring forward a development scheme, a 'refresh' of an initial survey may be needed at the very beginning of the development process, before any detailed or design work starts. A review of an out of date HNA can help in understanding whether a proposal is justified at that point in time.

4.13.2 Within the National Park the focus upon the efficient use of land and resources is critical. For this reason previous Local Plans have taken the approach of allowing development only to come forward where there is a clearly identified need for affordable housing. Sites which are allocated are not done so to allow speculative development in the absence of identified need, but to ensure that appropriate developable land exists at such a time as a need is identified. For this reason Housing Needs Assessments are relied upon in order to justify development coming forward on both Rural Exception Sites and on allocated sites.

#### 4.14 *Conclusion: the affordable housing need model outcomes*

---

<sup>10</sup> <https://www.devoncommunities.org.uk/services/rural-housing>

- 4.14.1 The Table in Appendix 1 sets out the Affordable Housing calculations undertaken by Three Dragons. The model provided enables adjustment to a range of factors based upon what is considered to be the best available information, and most reasonable assumptions, The approach taken is that of a 'policy compliant' affordable housing model.
- 4.14.2 It identifies an annual backlog requirement in the model of 45 units annually. However, the total affordable housing requirement figure is lower, because it is reduced by a negative requirement for newly arising affordable housing arriving at an affordable housing requirement of 30 units annually. Within the National Park, the existing affordable housing stock and healthy churn within that stock (and out to the open market), means there is a high level of re-lets available to meet newly arising affordable housing need. A proportion of the annual supply of affordable housing is directed towards the backlog, and a proportion towards meeting newly arising need.
- 4.14.3 If met over a 5 year period this would result in an annual requirement for 30 dwellings. Whilst overall this approach is not set out explicitly in national guidance, the Authority should take a reasonable and defensible local approach to understanding affordable need (justified in the context of national guidance on exceptions to the Standard Methodology), and this well tested method is considered to be a suitable calculation in the context of National Park need.

#### *Recommendations for policy*

- 4.14.4 The recommendation of Three Dragons is that, on balance, the most appropriate affordable housing figure from a policy compliant model, with reasonable assumptions based upon the best available evidence, is 30 dpa.
- 4.14.5 Whilst there is a clear discussion above around the affordable housing drivers behind policy within the National Park, it should continue to be recognised that there is a balance to be struck between the affordable housing requirement, viability of development, and the need to respond to demographic signals identified in the evidence. The affordable housing figure alone would not address demographic challenges discussed above. In summary, therefore, it may not therefore meet the housing need when accounting for wider market and demographic signals, and a level of uplift is likely to be necessary in policy response. The consideration of this in taking forward an appropriate housing number in the Local Plan is discussed in Section 5.

#### *4.15 Response to consultation on issues*

- 4.15.1 The Issues consultation held in winter 2016/17 asked consultees how the Local Plan should plan to meet Dartmoor's housing need, including whether we should continue to prioritise local and affordable need over Dartmoor's market housing need. There was clear support for continuing the current approach of focusing on provision of local and affordable housing and ensuring that these are protected in perpetuity. There was an understanding that this was the most sustainable approach for using the National Park's limited land resource to best effect. There was concern about the impact of right to buy and second home ownership on the existing stock, increasing housing prices and worsening opportunities for local people to remain in their communities
- 4.15.2 Importantly, communities are keen to ensure that affordable homes come forward to meet local needs, and are occupied by local people. This therefore reinforces the role of HNAs, which help ensure that development coming forward is of a scale and tenure mix which meets local needs, and gives a greater likelihood that homes will be allocated to local

people. A failure to deliver the right homes for the right people can leave a community disenfranchised with the principle of affordable housing, and lead to a lack of community support.

*Recommendations for policy*

- 4.15.3 It is considered appropriate that the stance of requiring justification for the delivery of allocated sites is maintained in the next Local Plan. This approach is fundamental to the National Park focus upon affordable housing delivery, and ensuring that land only comes forward when it is needed to support development which is delivering the housing strategy. It is though recognised that as the quality of live registers, such as Devon Home Choice, improves, evidence from the housing register may become of more relevance in justifying the principle of development, rather than solely informing tenure type and mix.
- 4.15.4 Given the general background of housing need and affordability it is considered that smaller schemes (e.g. <5 units) could come forward with an 'assumed' level of need, rather than requiring specific HNA justification. This should be carefully considered against the size and sensitivity of settlements, it may be necessary for a lower threshold (e.g. <3 units) to apply for smaller settlements. Devon Home Choice data may still be helpful in informing the mix of affordable housing in smaller scale windfall development.

## 5 Local Plan Strategy - aims and objectives

### 5.1 Overall LP aim and objective for housing provision

5.1.1 The discussion in sections 3 and 4 describe a complex picture of housing across the National Park, with a range of issues which compound understanding, policy options and delivery. In particular there is an absence of a direct government methodology to understand housing need in the National Park context. This serves to empower DNPA to make decisions proportionate to its requirements, and circumstances, though also opens up opportunity for uncertainty and debate. This is compounded by a lack of data available at the National Park level to provide a clear picture of local circumstances. Furthermore there are then a range of issues and challenges for the Local Plan to address, market signals to take into account, and all within an area of significant environmental constraint to delivery, where there is a strong policy presumption against market housing and large scale housing growth. This also leads to an element of 'blurring' of policy on/off calculations, and an approach which takes into account the best and most reasonably available evidence, and how to respond to this in the context of the National Park.

5.1.2 The National Planning Policy Framework (NPPF) states that "strategic policy-making Authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met in neighbouring areas) can be met over the plan period" (para 65). In the context of National Parks there are a number of key considerations:

- The Environment Act 1995 sets out the purposes of National Park designation, and at that time provided for National Park Authorities as standalone Local Planning Authorities, a clear outcome of which being that it enables National Parks to establish local planning policy which could reflect their distinct circumstances, and the importance of the area.
- The Government Circular and Vision for the National Parks and the Broads (2010) states "The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services. The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term".
- The 2018 NPPF states that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks*". The NPPF goes on to state "*The scale and extent of development within these designated areas should be limited.*"
- As described above, MHCLG figures for the standard methodology for housing do not provide a figure for National Park Authorities. Providing further advice around this, the National Planning Practice Guidance (NPPG) states that "*Where strategic policy-making authorities do not align with local authority boundaries, such as National Parks and the Broads Authority, available data does not allow local housing need to be calculated using the standard method set out above. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.*"

5.1.3 These factors indicate a clear direction of travel for a National Park Local Plan which may differ from traditional, and indeed neighbouring Local Planning Authorities. It also shows a consistent message from Government that National Parks are exceptional to its normal housing and planning policies. As a consequence, most National Parks, including Dartmoor, have adopted strategies within their local plans which reflect factors such as:

- An important landscape and landscape character highly sensitive to change
- Rich biodiversity and cultural heritage which limits opportunities for development
- A high demand for housing leading to higher house prices and higher land values
- Services, facilities and infrastructure which reflect their deeply rural nature

5.1.4 The above factors lead to a pattern of high demand, and constrained supply. The outcome being that it is only reasonable that Dartmoor National Park Authority adopts a strategy which places great weight upon:

- Understanding and meeting locally derived need, including the mix and type
- A focus upon affordable housing delivery on-site
- Maximising brownfield development, existing buildings, and efficient use of land
- Close collaboration through the Duty to Co-operate to meet the need for general market housing outside the area
- Maximising the effectiveness of available land by:
  - resisting speculative development which may use land in limited supply without meeting identified local needs
  - securing affordable housing to meet local needs in perpetuity

## 5.2 *Proposed housing number*

5.2.1 Following from the above, and taking into account the recommended baseline figure from Section 4 it is recognised that DNPA should, in its local plan, establish what level of housing it expects to deliver. However given the reasoning set out above it is considered appropriate that rather than setting a housing 'target', DNPA may instead identify an 'indicative' housing delivery figure which provides clarity on the intention of the local plan in order to:

- a) Establish agreement with adjoining authorities regarding the extent to which housing need across the HMA will be met;
- b) Provide a strategic direction for the plan, ensuring that policies are consistent in seeking to deliver a reasoned strategy;
- c) Ensure a reasonable monitoring benchmark which ensures that the success of the Local Plan can be judged and measures taken if delivery is not as expected.

5.2.2 The reasoning for an 'indicative' figure as opposed to a target, would be to make clear that DNPA is not committed through its local plan to a level of general housing delivery, and that development will come forward at a rate which reflects local need identified at a local (bottom up) level through HNAs. A further discussion on how this should be monitored in the broader HMA context, is described at 5.4.8.

5.2.3 In order to identify what indicative housing delivery figure may be appropriate, a number of factors are weighed up:

**a) The current plan figure, and the historic rate of delivery against this**

The 2008 Core Strategy established a figure of 50 dwellings per annum (dpa). This figure reflected the emerging Regional Spatial Strategy at that point in time, and marked a step down from the Devon County Structure Plan figure of 60dpa. The current local plan policies and allocations have been successful in delivering a level of development consistent with this figure. This level of development is therefore proven deliverable within the National Park, however it is evident that if housing development continues at this rate the National Park population remains relatively static, and within that it sees an increase in older people, and a loss of younger working age people, as described in detail above.

**b) The merits of the different projected scenarios:**

- **Lower growth**

A lower growth scenario would clearly be justifiable from a conservation perspective. It is perhaps worth establishing a principle that arising from the thrust of government policy that national parks should see a level of growth necessary to meet local needs but not more. On this basis it would be appropriate to start in considering an indicative figure, from the lowest level, and move this figure upward until such a point as development is viable, local needs are reasonably met, and strategic demographic goals are positively pursued.

The lower growth scenario of 30dpa would effectively be a strategy of accepting the depopulation of the National Park. Within this falling population Dartmoor would see a significant increasing proportion of older people, and a significant fall in younger and working age people. With a lower rate of development a significant change in strategy from the current Local Plan would be required, which would likely shift to a reliance upon rural exception site policy in order to delivery almost solely affordable housing.

This approach would not be a positive strategy responding to the needs of the local communities, generating a mix of housing and bringing schemes forward independent of a reliance upon government grant. The impact of gradual depopulation would place a greater stress upon the sustainability of communities and their ability to support local services.

The pros and cons of the lower growth model are also considered against the different model approaches set out in the Three Dragon Technical Paper.

- **Current level of growth**

As described above an indicative figure of 50dpa is proven deliverable. What remains arguably unaddressed within this scenario is the re-profiling of the National Park population within this. With the negligible population growth expected from this level of delivery, the increase in proportion of older people and loss of younger and working age people remains a significant issue. Viability of sites is achievable and this level of development is considered proven to strike a reasonable balance between conservation objectives and affordable housing delivery.

The pros and cons of the current growth model are also considered against the different model approaches set out in the Three Dragon Technical Paper.

- **Higher growth**

Only with a level of development above the current 50dpa is a positive impact upon population change projected. Projections indicate that a level of population growth would reduce the proportion of ageing population and loss of working age people. Importantly this cannot be seen as a tool in isolation though, and is dependent upon associated policy tools which aim to deliver houses of a type, size, tenure and in a location which foster a maintenance of the working age population. Equally important is that the policy driver of population balance does not lead to such shift that we lose sight of the principle goal of affordable housing. An indicative delivery figure which is growth driven in response to population change could lead to either an over-delivery of affordable housing, beyond identified needs, or a clear erosion of the priority for affordable housing delivery which leads to greater growth and land take inconsistent with local goals, constraint, and national policy context.

The pros and cons of the higher growth model are also considered against the different model approaches set out in the Three Dragon Technical Paper.

**c) The deliverability of different levels of growth**

The level of development seen under the current local plan has been proven deliverable. A lesser level of development is evidently therefore deliverable, however as suggested above this would likely require a different strategy with a shift towards a reliance upon exception sites for delivery. This is because allocation of land at a scale which would deliver viable affordable housing sites sufficient to meet need may lead to a greater rate of delivery than is intended by the strategy. A level of development beyond the current 50dpa is considered achievable, however depending on scale becomes dependent on or constrained by factors such as environmental capacity, land availability, industry capacity, community support, and market demand. The Land Availability Assessment indicates a sufficient pipeline of land supply to achieve a significantly higher rate of development. Importantly this is a 'policy off' assessment of land supply, and furthermore does not take into account a need to consider long term capacity and making the best use of land in order to enable a longer term supply of reasonably achievable sites.

**d) The level of constraint to growth**

5.1.2 above describes the national policy (NPPF) context, including in particular that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks*" and that "*The scale and extent of development within these designated areas should be limited.*" Evidence has been undertaken to inform the local plan including a Landscape Character Assessment (update) and a Landscape Sensitivity Assessment for each of the larger settlements in the National Park. Whilst the Landscape Sensitivity Assessment does not provide a scale of information such as to inform the relative merits of sites in a community from a landscape perspective, it makes clear the high sensitivity of the National Park landscape to change, which is important to take into account in considering the overall strategy. In particular it notes:

*“At a more strategic level, the Assessment demonstrates an overall sensitivity to development of the Dartmoor landscape surrounding the main settlements. The Assessment focuses on what are likely, in planning policy terms, to be considered the most appropriate locations for development. The study is one of sensitivity, not of capacity, but what may be concluded from the assessment is that there exists a level of sensitivity in the National Park context which limits the capacity for change or growth even in its most sustainable locations. This may provide helpful evidence when considering development opportunities in a sub-regional context.”*

**e) The compatibility of the figure with the affordable housing need**

As described in 5.2.3(b)(iii) above the need for affordable housing and any wider strategy driver relating to population composition must be complementary. A level of development which will fail to reasonably achieve the affordable housing delivery needed within a community, or the National Park more broadly, may not be considered a positive strategy for delivering housing needs in the context described. Equally, however, a level of development which places too great an emphasis on population scale and composition could undermine the focus on affordable housing, either leading to over-delivery, or a greater proportion of market housing such that the strategic focus is eroded.

**f) The compatibility of the figure/strategy with National Park purposes**

Overall, it is fundamentally important that the indicative housing delivery figure and the associated strategy is consistent with national park purposes. The above factors combine to paint a picture of a need for balance between meeting local need, a desire to take into account population projections and their implications, the national policy, local deliverability and local constraint.

### 5.3 Response to Consultation on Issues

5.3.1 The Issues Consultation (winter 2016-2017) identified, inevitably, a mix of views. There were, however, key messages coming forward which included:

- Focus on local need and not wider housing targets
- Prioritising affordable housing need
- Recognising the need for a mix of housing for balance and viability
- Focus development in the most sustainable locations (towns/villages)

The outcomes of the Issues consultation were considered by the DNPA Member Steering Group together with evidence which was completed during 2017, including the population projections, housing need evidence described above, and landscape character and other contextual evidence.

5.3.1.1 In January 2018 the Authority considered a ‘Direction of Travel’ paper at which Members considered the options before them, and heard the views of the Steering Group Members. They considered the following points:

- Projections show an ageing population, the scale of which could be limited to a degree through housing delivery



- Reducing household size, increasing empty homes/second homes, and housing development over the plan period have led to no real net change in population 2001-2011
- There is a local desire for greater flexibility in smaller settlements
- The farming community would welcome increased flexibility, but is threatened by the increased opportunity which would come as a result
- There is a need to plan for suitable accommodation for older people, including downsizers
- There is a desire to see greater opportunity for small builders and custom/self-build
- Opportunity to set an evidenced affordable housing threshold appropriate for Dartmoor
- Communities appear to be enthusiastic about limiting second home opportunities. A principal residence policy could chime well with a desire/need to increase the working age population, and make best use of our housing stock, but the unintended consequences are as yet untested
- Some interest in exploring how low impact development could work
- Communities are keen to see what is 'genuinely affordable'

5.3.1.2 Through this paper Members considered this range of options, and supported a strategy of delivering between 50 and 80 dwellings per year in the local plan, narrowing the preferred approach (this report and the minute is published on DNPA's web site).

5.3.1 More detail regarding delivery options were considered at a housing policy workshop in January 2018. Members discussed the options and considered the local plan should seek to identify, through the best available evidence, what figure between 50-80 would strike seek to achieve some impact upon the demographic challenges identified, whilst being achievable, viable, and appropriate in the context of environmental constraint.

5.3.1.1 At the May 2018 Steeing Group Members considered an emerging Housing and Economic Strategy Paper. Members considered key points, in line with the factors (a-f) described above and received a presentation from officers on key issues and options.. They were also appraised of the current status of discussions with neighbouring authorities. They therefore considered and balanced in their consideration:

- The Demographic evidence around population change
- The affordable housing need, and how this might be met (in the context of current and emerging models)
- The implications of lower, current and higher growth numbers in the plan
- The viability of delivering the affordable housing need, in the context of an emerging viability of 45% affordable housing

5.3.2 Officers and Members also discussed emerging options around the suite of other policy measures which could be in place within the plan, which would recognise the more nuanced and tailored approach taken locally to respond to the demographic challenges, in a way which would avoid responding to this with a 'blunt' approach of simply building large quantities of market housing. In particular these included:

- Accessible dwellings, in order to build a growing stock of homes for an ageing population, and improving opportunities for downsizing
- Local occupancy restrictions, and self-build in particular
- Eligibility to local occupancy, with a clearer drive to enable people working in the national park to qualify for affordable housing. This would seek to attract or retain more working age people

5.3.3 A DNPA member workshop was held in June 2018 Members were invited to consider a draft housing strategy and confirmed support of an indicative housing delivery figure of 65 dwellings per year. With reference to local strategy this figure recognises:

- The desire to deliver an appropriate level of housing in the National Park which takes into account the level of housing need identified
- The necessity to provide for an increased level of cross subsidy to support the delivery of affordable housing
- An alignment with the affordable housing need of 30 and an emerging viability of 45%
- The retention of a focus upon the delivery of affordable housing to meet identified local need
- The strategic ambition to avoid the depopulation of the National Park
- The strategic ambition to limit the projected ageing population profile
- The constraints on supply and delivery described above
- The likely achievable pipeline of sites, considered against the available evidence and in the context of historic levels of delivery

#### 5.4 *Exeter and Plymouth Housing Market Areas*

5.4.1 There are four separate Housing Authorities covering Dartmoor. The National Park sits within two Housing Market Areas (HMAs) – the Plymouth HMA which includes the parts of West Devon and South Hams inside the National Park, and the Exeter HMA which includes the parts of Teignbridge and Mid Devon inside the National Park. The scale and distribution of housing across the Housing Market Areas is an important element of Duty to Co-operate discussions. DNPA has worked together with its partner authorities within the respective HMAs to understand the housing needs of the National Park within the context of the two HMAs.

5.4.2 The Plymouth and South West Devon Joint Local Plan was adopted by the constituent authorities in March 2019 and covers the administrative areas of Plymouth City, South Hams District and West Devon Borough. DNPA responded to the draft Joint Local Plan and appeared at the Examination hearings. The Greater Exeter Strategic Plan (GESP) is not as advanced, with the draft Plan timetabled for 2019, although this timetable is under review. DNPA has been involved in discussions at officer level regarding the scale and distribution of housing and also the Habitats Regulations Assessment of the strategic site allocations. There has also been extensive joint evidence gathering and an ongoing dialogue at officer level.

##### *Plymouth HMA*

5.4.3 The adopted Joint Local Plan (JLP) covers the city of Plymouth, and the areas of South Hams and West Devon which lie outside the National Park. The housing need for the HMA is met, largely through the JLP, but also taking into account an allowance of 600 dwellings over the JLP plan-period, which is expected to be delivered within the National Park. This figure was derived before the review of the Dartmoor Local Plan started, and is based upon the historic level of delivery within the South Hams and West Devon parts of the National Park. Within these areas, sites are allocated in Local Centres currently, and in the draft Local Plan, to meet locally identified affordable housing need, including an element of cross subsidy on sites to support delivery and create balanced communities. The overall figure for indicative housing delivery has in the draft Dartmoor Plan risen from 50 per year, to 65 per year, across the National Park, meaning that there will be likely a slightly higher number than anticipated arising from the Dartmoor 'allowance'.

5.4.4 The JLP Authorities (Plymouth City Council, West Devon Borough Council and South Hams District Council) made representations at the Regulation 18 Stage of the Dartmoor Local

Plan, setting out that they believed that the local plan should set out a housing requirement figure in order to provide certainty that the 'Dartmoor Allowance' set out in the Plymouth and South West Devon Joint Local Plan would be delivered, and would provide a clearer basis for setting out a housing trajectory, a 5 Year Land Supply, and monitoring housing delivery to ensure that the needs of the HMA are being met in full. Discussions have been undertaken to explore this issue in more depth, and DNPA recognises that the JLP Authorities would favour greater commitment to the delivery of the figure which is expressed in the Dartmoor Local Plan as an indicative housing delivery figure.

- 5.4.5 DNPA considers that the Dartmoor allowance is, in the HMA context, a small amount of housing. DNPA maintains that the approach taken is sound in the National Park context, and has confidence in the delivery of housing to meet identified needs within the South Hams and West Devon parts of the National Park. The key concerns of both DNPA and the JLP Authorities are to ensure that housing delivery takes place as set out in the JLP and the Dartmoor Local Plan.

#### *Exeter HMA*

- 5.4.6 Teignbridge and Mid Devon are working with East Devon and Exeter to prepare the Greater Exeter Strategic Plan as a statutory joint local plan. This will provide the overarching strategy for the constituent local planning authorities including the overall level and distribution of housing. Housing provision within Greater Exeter will include strategic sites allocated within the GESP itself, and other housing sites allocated in subsequent local plans prepared by the individual councils based on strategic guidance provided by the GESP. Teignbridge has commenced an update of the Teignbridge Local Plan. The GESP is currently considering housing need on the basis of the standard methodology, the results of which therefore include an element of need arising from household growth within the Dartmoor National Park portion of the Exeter HMA. The GESP authorities agree that any provision within the Exeter HMA element of Dartmoor would be designed to meet local Dartmoor need, using DNPA's locally determined methodology. In preparing the GESP, the Greater Exeter authorities will consider to what extent this provision should be taken into account within the overall GESP housing targets.

#### *Monitoring and Review of Housing Delivery*

- 5.4.7 Taking the above into account, it is important that the contribution made by the National Park towards the overall delivery across the two HMAs is understood, and monitored. Furthermore, continuing the collaborative approach to strategic housing delivery, an appropriate review process should exist in support of the Dartmoor Local Plan. This would ensure that, where monitoring indicates a clear under-delivery within the respective parts of the National Park such that the Dartmoor Allowance and local affordable housing need is not being met, and such that any under delivery impacts upon the meeting of need across the HMA, this may necessarily lead to a review in whole or part of the plan.
- 5.4.8 The following sets out the framework which will be used for monitoring Dartmoor's Housing delivery, it is intended to be followed sequentially;
1. Assess whether monitoring indicates that current housing delivery across the HMAs is on-track to meeting the HMAs' housing needs.
  2. Where there is under-delivery of housing which means the HMAs' needs are not being met, we will work with partners to identify in which local planning authority area(s) this is occurring.
  3. Where under-delivery in Dartmoor National Park alone or in combination is leading to under-delivery in either HMA, we will identify whether it has been sustained for at least 3

consecutive years and whether it is by such a significant amount that it is material, taking into account:

- the development pipeline in Dartmoor National Park and across the relevant HMA, i.e. development which is under construction or that has been permitted, but not started;
  - the proportion of under-delivery in Dartmoor National Park relative to under-delivery across the relevant HMA;
  - that the NPPF requires great weight be given to conserving and enhancing National Parks' special qualities; and
  - that the 2010 National Park Circular states National Parks are not suitable locations for unrestricted housing to meet general housing needs and does not therefore provide housing targets for them.
4. Where under-delivery in the National Park is material, we will consider the reasons for any under-delivery with stakeholders, including whether they are related to Dartmoor National Park's Local Plan or other factors in the housing delivery process, such as the Development Management process, economy, housing market or other factors. Consistent with national planning practice guidance for the Housing Delivery Test outside National Parks, we will complete an action plan in partnership with other relevant Authorities which seeks to address any under-delivery across the HMA.
5. Where policies in Dartmoor National Park's Local Plan are identified as an issue in the action plan, we will review relevant policies within the Dartmoor Local Plan within two years to address the issues identified.

#### *Recommendations for Policy*

5.4.9 The Local Plan should contain an indicative housing delivery figure of 65 dwellings per year.

5.4.10 The monitoring framework for housing delivery should be incorporated into the first Authority Monitoring Report following the adoption of the Local Plan.

#### *5.5 Spatial Strategy and the distribution of housing growth*

5.5.1 A local plan's spatial strategy is the way in which different policies apply in different places and steer development to the most appropriate places. It is its most powerful tool for shaping how an area changes. The spatial strategy topic paper<sup>11</sup> discusses the evidence supporting the spatial strategy and settlement hierarchy. It proposes a change from the current two-tier settlement hierarchy: a three-tier hierarchy comprising Local Centres, the largest and most sustainable, Rural Settlements, larger villages with relatively good access, and Villages and Hamlets, the National Park's smallest, most sensitive and isolated settlements. The new local plan will need to consider how housing growth is appropriately distributed across all three settlement types.

5.5.2 The current local plan focuses 60% of planned housing growth in the Local Centres with 40% occurring elsewhere (Rural Settlements, and the open countryside). Table 6 summarises housing permissions and completions in the National Park over the current plan period, distinguishing between that delivered within each tier of the settlement hierarchy. Over the plan period 67% of all housing completions were in Local Centres, 25% were in Rural Settlements and 8% were in the Open Countryside. Of those granted planning

---

<sup>11</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0004/1416523/2019-09-09\\_Vision\\_and\\_Settlement\\_Strategy\\_Topic\\_V4.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0004/1416523/2019-09-09_Vision_and_Settlement_Strategy_Topic_V4.pdf)

permission, but not completed, a higher proportion of homes (78%) were permitted in Local Centres.

- 5.5.3 The evidence suggests that current policy has successfully directed the right proportion of housing to the Local Centres. However the response to the Issues consultation was that a greater level of opportunity was sought in other smaller settlements which has not been met under the current strategy.
- 5.5.4 Discussion in the settlement strategy topic paper states that one benefit of the 3-tier approach, which splits the settlements currently classified as Rural Settlements, is that it can be used to allow slightly more opportunity in the newly created middle-tier of settlements. The desire for more opportunity has been communicated within feedback received through consultation. The 3-tier approach is also a better reflection of the diversity in Dartmoor's settlements. In terms of housing delivery, a 3-tier approach means that policies relating to the middle tier can be tailored to ensure these settlements make a better contribution to overall housing provision within the National Park.
- 5.5.5 Table 5 below considers an expansion of the apportionment of 60% of dwellings for the Local Centres, with a clearer expectation as to the level of development which might be expected in the Rural Settlements and Villages and Hamlets. The apportionment is indicative (as the 60% has been) rather than a policy target. However it may provide an effective way of understanding the anticipated spatial distribution, and provide an indication of expectations to enable effective monitoring. Ultimately, though, with a needs-led approach to policy it is right that the apportionment should not be expressed in policy as a target, as at this small level of development it is reasonable that it is responsive to local needs and delivery, which will vary year on year.
- 5.5.6 The indicative split proposed is 60% in Local Centres, 25% in Rural Settlements, 10% in Villages and Hamlets and 5% in the open countryside.

**Table 5 - Indicative apportionment of dwellings between classified settlements and the open countryside**

	Population	Proportion by population	Proportion by spatial strategy	Apportionment of housing figure	Apportionment annualised	Per settlement annualised
<b>National Park</b>	34,500	100%	100%	975	65	-
<b>Local Centres</b>	15,517	45%	60%	585	39	4.9
<b>Rural Settlements</b>	7,759	22%	25%	244	16	1.0
<b>Villages and Hamlets</b>	4,705	14%	10%	98	7	0.4
<b>Residual (open countryside)</b>	6,519	19%	5%	49	3	-

- 5.5.7 It may then be considered whether it is appropriate or indeed achievable to set a housing number for individual settlements. Whilst this could provide a degree of certainty for communities and developers and may encourage development to come forward, it does require a robust evidence base which accurately assesses local needs. The South Downs National Park drew on evidence provided by a Housing and Economic Development Needs Assessment (HEDNA), SHLAA and Settlement Facilities study. DNPA does not have sufficient evidence to justify this approach and would be concerned about the flexibility of the approach to meet local needs. The National Park's largest local housing needs are

within the Local Centres, here it is proposed that delivery is best secured through site allocations rather than a target housing number.

5.5.8 The *Housing White Paper: Fixing our broken housing market* proposed to amend planning policy so that neighbourhood planning groups could obtain a housing requirement figure from their local planning authority. This proposal was taken forward, and the 2018 NPPF para 66 states: “within [the overall housing requirement figure], strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.”

5.5.9 This requirement represents a shift in national policy and could form a new approach to apportioning the overall housing number, particularly where neighbourhood plan areas cover a significant portion of an Authority’s area. The Local Plan’s ‘overall strategy for the pattern and scale of development’ is one which seeks to ensure there is sufficient opportunity for communities to meet identified local housing needs. It is therefore reasonable that this is the expectation of neighbourhood plan areas rather than a specific figure being provided, although there are two potential routes to assist Neighbourhood Plan groups:

- a) An indicative figure could be provided where an up to date housing needs assessment was available.
- b) Areas could be provided an estimated figure on the basis of a further apportionment of the indicative housing delivery figure (for example either the figure for the settlement type divided by the number of settlements, or divided amongst the settlements but weighted by population).

Neither of the above approaches is ideal, and, even less when recognising that the overall apportionment by settlement type is considering very small numbers which means that whichever approach is taken forward is going to have a fair degree of uncertainty. Given this, considered with the needs-led approach and the limited uptake of and success of Neighbourhood Plans in the National Park, it is not proposed to set out at this stage a figure for each area. Instead it is reasonable that, in line with the apportionment described above DNPA assist Neighbourhood Plan groups seeking an indication of anticipated housing figure on a case by case basis, considering the most up to date information available at that point in time.

#### *Recommendations for policy*

5.5.10 Set housing distribution figures for Local Centres, Rural Settlements and Villages and Hamlets with at least 60% in the Local Centres and a background indicative split of 25% in Rural Settlements, 10% in Villages and Hamlets and 5% in the open countryside for monitoring purposes. This will provide a benchmark for monitoring delivery and a basis for triggering a review of policy if numbers are not being delivered or particular parts of the settlement hierarchy are not benefitting from new development.

### 5.6 *Proportion of affordable housing*

5.6.1 The Local Plan sets out the proportion of housing development that is required to be affordable housing. The existing Local Plan seeks that at least 50% of development within Local Centres is delivered as affordable housing. This reflects that affordable housing delivery is a priority in the National Park. Policies requiring affordable housing are however variable where it is essential for development viability or where necessary community infrastructure is being delivered. Table 6 shows housing delivery over the course of the current Local Plan, structured by decision year to show the effects of Local Plan policy. The

Local Plan has delivered 207 affordable homes, 42% of total housing delivery from decisions made in this period. National Planning Practice Guidance states that Plans should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards including the cost implications of the Community Infrastructure Levy (CIL) and planning obligations.

- 5.6.2 The proportion of affordable housing sought by the Local Plan is determined by ensuring sufficient houses are delivered to meet identified affordable housing needs and that the percentage of affordable housing required as part of development is achievable by developers within the limits of viability.

**Table 6 - Housing delivery in classified settlements and the open countryside from decision made between 2007/08 and 2018/19**

		Decision year												Total
		07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	
<b>Completions (including under construction)</b>	Local Centre	32	7	26	20	16	26	39	68	44	13	46	5	<b>342</b>
	Rural Settlement	12	14	22	1	3	7	19	6	22	4	6	0	<b>116</b>
	Open Countryside	4	2	0	8	5	3	5	1	3	2	4	2	<b>39</b>
	<b>Total</b>	<b>48</b>	<b>23</b>	<b>48</b>	<b>29</b>	<b>24</b>	<b>36</b>	<b>63</b>	<b>75</b>	<b>69</b>	<b>19</b>	<b>56</b>	<b>7</b>	<b>497</b>
	<i>Affordables</i>	12	10	43	25	10	13	31	18	13	13	19	0	<b>207</b>
	<i>Affordables %</i>	25	43.48	89.58	86.21	41.67	36.11	49.21	24	18.84	68.42	33.93	0	<b>41.65</b>
<b>Permissions (including permissions started, but not under construction)</b>	Local Centre	0	0	2	1	0	3	0	0	3	5	56	23	<b>93</b>
	Rural Settlement	0	0	0	0	2	0	0	3	2	2	4	1	<b>14</b>
	Open Countryside	0	0	0	0	1	0	0	0	0	1	1	2	<b>5</b>
	<b>Total</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>8</b>	<b>61</b>	<b>26</b>	<b>112</b>
	<i>Affordables</i>	0	0	1	0	2	2	0	0	0	1	20	2	<b>28</b>
	<i>Affordables %</i>	-	-	50	0	66.67	66.67	-	0	0	12.5	32.79	7.69	<b>25</b>
<b>Completions and permissions</b>	Local Centre	32	7	28	21	16	29	39	68	47	18	102	28	<b>435</b>
	Rural Settlement	12	14	22	1	5	7	19	9	24	6	10	1	<b>130</b>
	Open Countryside	4	2	0	8	6	3	5	1	3	3	5	4	<b>44</b>
	<b>Total</b>	<b>48</b>	<b>23</b>	<b>50</b>	<b>30</b>	<b>27</b>	<b>39</b>	<b>63</b>	<b>78</b>	<b>74</b>	<b>27</b>	<b>117</b>	<b>33</b>	<b>609</b>
	<i>Affordables</i>	12	10	44	25	12	15	31	18	13	14	39	2	<b>235</b>
	<i>Affordables %</i>	25	43.48	88	83.33	44.44	38.46	49.21	23.08	17.57	51.85	33.33	6.06	<b>38.59</b>



## Draft Housing Strategy

The focus of housing development in Dartmoor National Park is the delivery of affordable, well-designed homes to meet the needs of local people. Market housing will support the delivery of affordable housing, it should also respond to the needs of local people in terms of size, mix and tenure. Around 65 new homes will be built in the National Park each year.

Housing development should be of a mix of house type and size which enables and encourages younger families to live and work within Dartmoor's communities, as well as providing opportunities for older local people to stay. Housing should be accessible and adaptable and strive for high levels of sustainability.

Housing delivery will reflect the Spatial Strategy. In Local Centres land is allocated for development to meet the affordable housing needs of local people: 45% of homes on allocated sites are required to be affordable, subject to viability. Developments which do not deliver a meaningful proportion of affordable housing that meets local needs will not be supported. A mix of housing can come forward within Local Centres, to meet local needs and respond to appropriate development opportunities.

In Rural Settlements a mix of small scale housing may come forward, and there are opportunities for development which meet local needs on brownfield sites. In Villages and Hamlets new housing is restricted to small scale development to meet local needs.

A rural exception site policy will operate in all classified settlements, allowing for a small amount of affordable housing, to meet identified local needs, where this cannot be met on another site.

Outside classified settlements new housing development will principally support the needs of farming, forestry and other land-based rural enterprises with a functional need for a worker to live in the open countryside.

Homes may be altered and extended to improve their design, efficiency and meet the needs of their occupants. The size of extensions and replacement homes is limited in order to retain a mix of smaller and more affordable housing.

## 6 Type of Housing Required

### 6.1 Types of need by population

#### 6.1.1 National Planning Practice Guidance states:

*“Local planning authorities should ensure that the policies in their Local Plan recognise the diverse types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement. This could include sites for older people’s housing including accessible mainstream housing such as bungalows and step-free apartments, sheltered or extra care housing, retirement housing and residential care homes. Where local planning authorities do not consider it appropriate to allocate such sites, they should ensure that there are sufficiently robust criteria in place to set out when such homes will be permitted. This might be supplemented by setting appropriate targets for the number of these homes to be built.”* (Paragraph: 006 Reference ID: 12-006-20150320)

6.1.2 As with all planning policies for affordable housing NPPF paragraph 60 and 61 provides the starting point and requires within the context of determining the minimum number of homes needed the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes, and people wishing to commission or build their own homes”).

6.1.3 Section 4 (Analysis of Housing Need and Supply) identifies a number of drivers which the Local Plan should recognise in line with the above groups. Those which are relevant considerations for the Local Plan are discussed below.

### 6.2 Housing for older people and specialist accommodation

6.2.1 Dartmoor has a growing elderly population which is leading to an increased demand for older person’s homes. Meeting the needs of this sector of the population has attracted growing interest in recent years, in part spurred by the Care Act 2015 with its emphasis on prevention and supporting independence of older people and those with special care needs. This requires a nuanced approach by planning policy providing accommodation reflecting the different levels and changing care and support needs of an older population. As the Planning Advisory Service Guidance Note<sup>12</sup> it also requires that there is greater dialogue between planning departments and Social Care teams.

6.2.2 **NPPG has been recently revised to better consider the needs of older people. In particular, it notes:**

*“Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”* (Ref ID: 63-001-20190626)

---

<sup>12</sup> Planning for Older People’s housing: the shock of the new - published Planning Advisory Service 2015

<https://www.local.gov.uk/sites/default/files/documents/read-case-study-here-13a.pdf>

6.2.3 It also notes:

*“Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future. It is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes.”* (Ref ID: 63-008-20190626)

6.2.4 Sitting alongside this guidance, the recent policy change that has been most readily been incorporated into planning policies are those to Building Regulations in 2015. These introduced two new ‘optional’ Building Regulations relating to accessible dwellings, which set standards in relation to accessible and adaptable dwellings - M4(2) and wheelchair accessible dwellings that are over and above the minimum requirements - M4(3). Local authorities can apply these optional standards by incorporating a requirement within their planning policies. These provisions have been incorporated into NPPG with corresponding advice.

6.2.5 Section 4.1 of the Design and Built Environment Topic Paper<sup>13</sup> includes detailed evidence on the need for older person’s accommodation and assesses the case for adopting these optional building regulations. The section concludes:

*“The huge projected growth of elderly persons in the National Park will bring with it unique demands on housing. Provision of accessible housing which can be easily adapted to meet common access requirements of older persons could make a valuable contribution to meeting elderly housing needs over the plan period. Simultaneously reducing the need for new development and allowing people to remain in their communities for longer.*

*It is recommended that the Authority seek that a proportion of new housing in the National Park is required to be accessible and adaptable and meets Building Regulations Part M4(2). The precise proportion should be informed by identified need and the impact the standard will have on overall development viability, this will be assessed further in the Housing Topic Paper.”*

6.2.6 Given the very small numbers involved in respect of specialist accommodation, it is not considered reasonable or proportionate to undertake National Park-wide assessment of need. Devon County Council has provided advice on need relating to extra-care and care provision in respect of specific market-led proposals within the National Park. This is reinforced by a local needs-led approach, which provides the most robust way to respond at a case-by-case level. Housing Needs Assessments seek to identify any specialist housing needs within a community at point of assessment, and from these DNPA has and would continue to engage with Local Authorities and providers to meet specific identified needs as part of a scheme. Local Housing Authorities also hold information in respect of specialist housing needs on their waiting lists, which feed into scheme design where appropriate.

*Recommendations for Policy*

6.2.7 Given the strong ageing population highlighted throughout the Local Plan’s evidence base it is recommended that accessible dwellings M4(2) are pursued on all new build dwellings, unless there is evidence which demonstrates there is no need or it is not possible or viable

---

<sup>13</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0003/1416522/2019-09\\_Design\\_and\\_Built\\_Environment\\_Topic\\_Paper\\_V4.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0003/1416522/2019-09_Design_and_Built_Environment_Topic_Paper_V4.pdf)

for planning or environmental reasons. Viability testing demonstrates that this is achievable<sup>14</sup>.

6.2.8 Wheelchair accessible dwellings provide for a more specialist need. NPPG states local plan policies for wheelchair accessible homes M4(3) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. As the National Park Authority is not the Housing Authority and do not fulfill this role it is not open to DNPA to require provision of wheelchair accessible dwellings. Evidence presented in the Design and Built Environment Topic Paper suggests that there is likely an extant need for this type of accommodation in Dartmoor's communities. It is therefore recommended that this standard be pursued where a specific local need is identified, as described above, allowing DNPA to work with the housing authority to ensure identified need for specialist housing is met.

### 6.3 *Tenure Split*

6.3.1 The Local Plan should seek to deliver a mix of tenures with a view to:

- Meeting identified local needs
- Creating mixed and balanced communities
- Supporting the viability of new development

6.3.2 The current Local Plan indicates that a 70/30 split between rented and intermediate sale tenures is likely to be the most appropriate. This has provided a helpful benchmark for delivery, however in reality the Authority has applied a practical and pragmatic approach which has sought to balance the above three factors, rather than adhere to a blanket approach on mix. The indicative split of 70:30 was discussed with attendees at the Housing Policy Workshop in December 2017 and the industry Viability Workshop in January 2018. Whilst it was noted that the mix may need to be varied to a higher proportion of intermediate tenure in response to viability, the mix was considered to reflect need represent a reasonable starting point, and aligns with Local Authority tenure split policies.

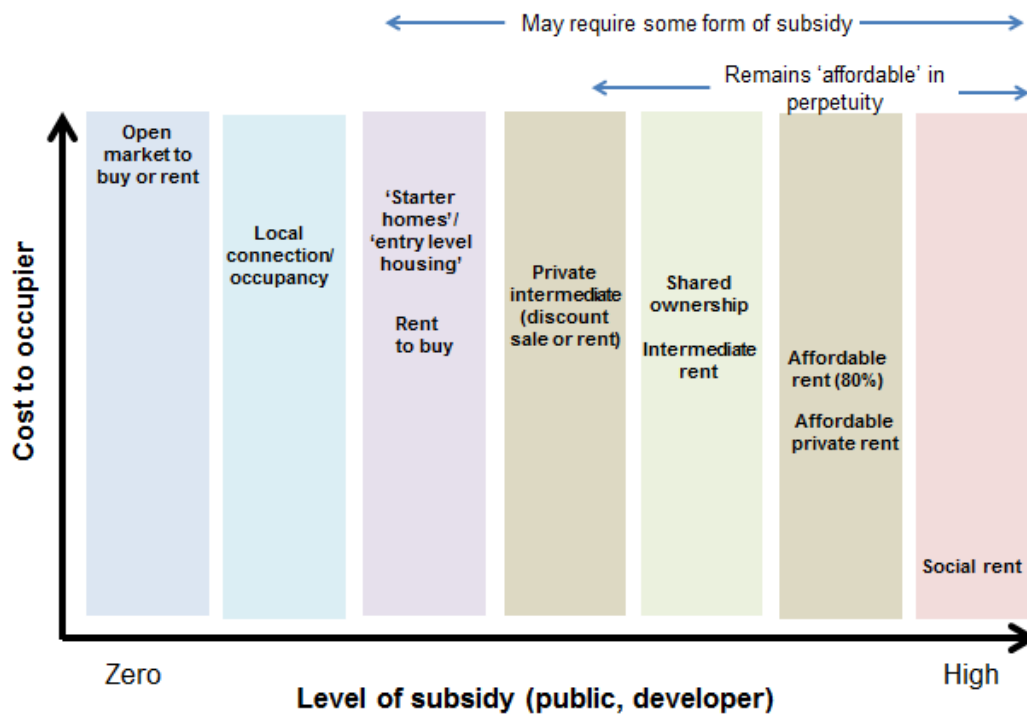
6.3.3 Within these tenures there are a number of different types of housing which may be delivered. The key types of affordable tenure are discussed below. Importantly each reflects a balance between need and viability. Having been through a period of more limited grant availability for rented tenures, these are now becoming more available and also include again grant for social rented properties. Delivery should where possible though reflect the need, and an understanding of the ability of those in need to afford different tenures of property. Government housing policy aspires to support home ownership, and the role of 'intermediate' housing products such as shared ownership housing, or starter homes, is to provide a 'stepping stone' to home ownership for those unable to afford a housing on the open market without financial support. Ranging from the most affordable upwards, current housing tenures are:

- Social rent (typically 50-60% of market rent)
- Affordable rent (80% of market rent)
- Share ownership (acquiring a portion of property through a mortgage)
- Discount market/starter homes

---

<sup>14</sup> DNPA Whole Plan Viability Assessment – November 2018

Figure 3 Comparing the level of subsidy needed for various affordable housing models with the on the prospective occupier



6.3.4 The above discussion sets out the priority for the delivery of affordable housing, and the importance of land/environmental constraints upon delivery. It is critical therefore that affordable housing is retained in perpetuity, recognising that the ability to recycle subsidy in the National Park context, and particularly within a given settlement, is extremely limited. On this basis it is reasonable to ensure that affordable housing is sustained as affordable in perpetuity and that delivery models which may staircase to the market and be replaced are not appropriate in the National Park context.

#### 6.4 Social and Affordable rents

6.4.1 Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).<sup>15</sup>

6.4.2 Affordable rented housing has become the predominant affordable rented tenure coming forward as part of new development schemes. As a rented tenure it reflects a more viable component of development schemes, however it can in some areas of the National Park fail to meet affordable housing needs where incomes are low. Housing Needs Assessments will ask respondents to complete income questions; these questions are important in determining the ability of those in housing need to afford different tenures of housing, with the principal being that applicants should be allocated to a housing tenure which requires the least subsidy or government support. Affordability is critical, though and a typical benchmark is that no more than 25% of gross household income is spent on housing costs.

<sup>15</sup> <https://www.gov.uk/guidance/definitions-of-general-housing-terms>

### *Recommendations for Policy*

- 6.4.3 With these principles in mind it is considered appropriate that the Local Plan sustains a flexible approach to affordable rented tenures, seeking to understand at a community level the need for affordable housing of different levels of affordability, and reasonably balance this with viability through the decision making process. In most cases this can be done in consultation with the community, in particular where there is a Community Land Trust with an interest in the site and the mix achieved.

### 6.5 *Affordable/intermediate sale*

- 6.5.1 Intermediate housing is 'more affordable' housing and aims to meet a need between affordable rent and market housing where the household is not able to afford market prices.
- 6.5.2 Through successive Local Plans DNPA has operated an intermediate housing model which allows for affordable housing for rent or sale, to be delivered privately. This model requires that occupants meet the same 'eligible household' criteria, but instead of the property specification and rent level being set by a Registered Provider, a Section 106 Agreement restricts the rent or sale price of the property each time it is re-let or sold.
- 6.5.3 Historically the Authority has limited the size of new intermediate dwellings to 80m<sup>2</sup> to sustain their affordability. A further discussion on a revised size for this type of property is set out in section 6.8 below. A key principle is that properties built via this route must be of a sale or rental value which is within the reach of a qualifying person; the Authority has expressed that this would be flexible on property size subject to an appropriate discount rate as necessary. Size and specification are important – high quality design is essential in the National Park, so a careful balance must be struck between good quality development and one that could be valued such as to be unaffordable to the people who are actually in housing need.
- 6.5.4 Through the last Local Plan the sale price or rental level has been discounted by not less than 20% from its open market level, having already taken into account the occupancy condition attached to the property (which typically is a discount of around 15%). The discount rate must reflect a balance between the viability of the development and the genuine affordability of the house; it is critical that the property is within reach of those in housing need it is intended to provide for. With an increased property size, and in response to properties which even through the discount have struggled to be realistically affordable, a return to the discount of 25% is considered to be reasonable for the next Local Plan.
- 6.5.5 In order to secure this, a Section 106 Agreement requires that upon the sale or resale of the property, a valuation is undertaken by the District Valuation Office at the owner's expense. In order to show clearly the discount applied these valuations will set out:
- a) the unrestricted market value of the property;
  - b) the value of the property, taking into account the occupancy condition;
  - c) the discounted value based upon a reduction of (b) by the percentage specified in the Section 106 Agreement.

The property is then not sold for more than this value.

- 6.5.6 The approach of valuation of this type of property has proven unsatisfactory to date. In an earlier iteration of the policy the vendor was required to seek valuations from three estate agents. The middle valuation was then the agreed price. This proved unpopular with some vendors, and was potentially an approach vulnerable to manipulation. In the more recent operation of the policy the District Valuation Office has been used as an independent professional valuation. Whilst this has had the benefit of probity, and a better understanding

of the policy restrictions to inform value, it has proven increasingly expensive. More recently DNPA has therefore allowed a valuation from a Chartered Surveyor appointed by DNPA, and agreed with the vendor at their cost. It is proposed that this more flexible approach continues.

- 6.5.7 The other key area of intermediate sale housing is shared ownership. This type of housing tenure can have a helpful role to play in the affordable market, the principle being it provides a stepping stone to home ownership by enabling a household to acquire equity in a property a benefit from the movement of the housing market. The model has significant challenges, in particular around affordability, owners understanding of the model and its restrictions, and the viability for the owner.
- 6.5.8 The private intermediate model described above cannot operate at a larger scale given the requirement for private lending, and the unwillingness of mortgage companies to large amounts of exposure within a single development or area. It is typical therefore for larger housing schemes to be development by or with a Registered Provider (generally a 'Housing Association'); this has historically provided the greatest number of new affordable homes in the National Park. Development may be undertaken by a Registered Provider, or in some cases it may be built by a developer and transferred to a Registered Provider on completion.
- 6.5.9 As a Designated Protected Area the loss of shared ownership properties to the open market is prevented. Therefore, where development by a Registered Provider includes properties for shared ownership the lessee would normally acquire up to a maximum of 80% of the equity of the property. What is important is that the property remains available as an affordable house for local people in the long term and not just for the duration of the first occupier. This is for the direct benefit of future occupants, to ensure the most efficient use of land and resources in the National Park, and ensures communities have confidence in the delivery and retention of affordable housing for community benefit. Sections 7.12 to 7.17 provide more detail on restrictions in s106 agreements.
- 6.5.10 Where a lessee is struggling to sell their share of the property (for example, because they have acquired a large share), the Authority would normally look to the Registered Provider to buy back all or a proportion of the equity. We will also be flexible with regard to the ongoing tenure of that property. For example by allowing it to become a rental property if the demand for shared ownership is limited. This type of development has the potential to be the beneficiary of commuted sums (off-site contributions) from other housing development in the area.
- 6.5.11 Section 106 legal agreements must be carefully worded to ensure they are flexible; an overly restrictive agreement can mean a development or property cannot be financed and therefore prevent the development from going ahead. Staircasing restrictions are one such issue: where the owner of a shared ownership home buys a larger share of the property. Some lenders are not currently supporting the 80% staircasing restriction which exists within Designated Protected Areas. As such, in order to enable development to come forward, DNPA will need to consider whether 100% staircasing will be allowed in some circumstances. The consequence of not allowing will mean that some development will not come forward. More critical viability appraisal indicates that a mix of tenures is required in some situations in order to enable the development to come forward.

## *Recommendations for Policy*

6.5.12 It is recommended that section 106 agreements are used to secure a 25% reduction on affordable sale properties, having already taken into account the occupancy restriction.

### 6.6 *Eligibility and use of local connections*

6.6.1 Current Core Strategy Policy COR15 provides that the focus of new development should be on affordable housing for local households whose needs are not met by the market. Whilst we will support some delivery of open market homes, particularly where they enable the delivery of affordable housing, we would expect the majority of new homes to provide for those eligible households who have a housing need and a local connection with Dartmoor National Park. Under current policy to be eligible to occupy an affordable dwelling in the National Park, a household must.

- Be in housing need; and
- Demonstrate that they are unable to buy or rent a suitable home at current open market prices; and
- Be a local person (as defined by the local connection criteria in the Development Management and Delivery DPD, 2.19.12).

6.6.2 **Be in housing need:** National guidance describes those in housing need as households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market. For example, their existing home may be in serious disrepair, they might no longer be able to afford to remain there, they may be homeless or threatened with homelessness.

6.6.3 In the National Park, eligible applicants for rented housing should have been assessed as being in affordable housing need and be registered on Devon Home Choice, the joint housing register for the three housing authorities which cover the National Park area. The Devon Home Choice register has five bands of need:

- Emergency Housing Need (A);
- High Housing Need (B);
- Medium Housing Need (C);
- Low Housing Need (D);
- No Housing Need (E) (where applicable)

6.6.4 Households in Band E (i.e. those who do not have *priority* need for housing) may still be considered to have a local housing need and can be eligible, provided that they are able to meet the remaining eligibility requirements within the Local Plan in that they are unable to rent or buy and are a local person. Within Teignbridge, which does not have band E, those making a 'Community Contribution' may be eligible for Band D.

6.6.5 The Devon Home Choice register can be accessed via this link:

[www.devonhomechoice.com](http://www.devonhomechoice.com)

6.6.6 Households seeking to buy an affordable home should be registered with the local Help to Buy Agent, Help to Buy South West (the Government agency responsible for marketing and processing applications for home ownership products including shared ownership). The agent will undertake a financial assessment and confirm that the applicant is unable to buy a home on the open market, but has sufficient income to purchase an affordable home and meets eligibility criteria set out in any section 106 obligation.

6.6.7 **Be unable to rent/buy at market prices:** Dartmoor National Park Authority applies a number of national guidelines to measure whether housing in the local market is affordable.



Typically we will ask Help to Buy South West to confirm a prospective occupier's eligibility for privately delivered intermediate housing. Houses available from a Housing Association would already be advertised through Help to Buy SW. Housing is typically assessed as being affordable if households on the lowest incomes (usually the bottom 25%, also known as lower quartile) are able to purchase or rent the bottom 25% of market rents or house prices.

6.6.8 For rented homes, a household is considered able to afford market housing where the open market rent represents no more than 25% of the gross household income.

6.6.9 When buying a home, an individual is considered able to afford to purchase on the open market if it costs no more than the sum of 3.5 times their gross income (allowing for a deposit). The income multiple can increase by up to 4.5 times for joint incomes.

6.6.10 **Be a local person:** DNPA currently defines 'local' for the purposes of applying affordable housing and drafting planning obligations as follows:

- those people currently living in the parish of provision, or a rural parish adjacent to the parish of provision, and having done so for a period of at least 5 years; or
- those people who have lived in the parish of provision or a rural parish adjacent to the parish or provision for a period of five years, but have moved away in the past three years; or
- those people who have a strong local connection with the parish of provision or rural parish adjacent to the parish of provision by virtue of, for example upbringing or current employment.
- Strong local connection - The Authority has specifically not defined the term strong local connection to enable us to exercise our discretion in individual circumstances. However, as a general guide, connection will in almost all cases be as a result of:
  - Strong family ties: Where this is the case this will typically be a direct living family member who satisfies the Authority's definition of a local person.
  - Employment: a person who is employed for not less than 16 hours per week in the parish of provision or whose work is primarily carried out within the parish, having done so for a continuous period of at least 2 years.
  - Previous residence: A person who can evidence having spent a significant length of time living in the parish or adjacent rural parish in the past.

6.6.11 Dartmoor's ageing population and falling working-age population is a strategic issue which the local plan is seeking to address. A key way of supporting this is ensuring that the National Park's local eligibility criteria ensure young people and those working locally, who are very unlikely to be able to live locally, are able to access housing near where they work. This is discussed further at section 7.9.

## 6.7 *Principal residence*

6.7.1 Principal residence occupancy restrictions are used to restrict the occupation of new homes to an occupier's principle or main residence. The approach is used as a controlling measure to prevent new homes being purchased as second homes.

6.7.2 Section 9.2 discusses the evidence surrounding second home ownership in the National Park in detail. The evidence identifies that second home ownership in Dartmoor National Park is not at levels sufficient to justify introducing principal residence occupancy restrictions.

6.7.3 Second home ownership can be an issue in Dartmoor's countryside. However, housing in Dartmoor's settlements is generally less attractive for second home owners. As the planning

system can only introduce a restriction on *new* housing and there is no significant new housing growth planned in the National Park's open countryside it is felt that the introduction of principal residence restrictions would not serve a useful purpose. The restriction would also serve to further depreciate the value of housing having implications on the overall viability of development in the National Park and the Authority's ability to achieve its priority of securing affordable housing.

- 6.7.4 There is an opportunity to consider however the operation of local occupancy conditions as a viable way of supporting small schemes which will deliver homes for local people. Section 6.10 below considers in more detail how self and custom build policy may respond to concerns around the increase in the level of second home ownership through local occupancy restrictions.

#### *Recommendations for policy*

- 6.7.5 Where the Local Plan does allow opportunities for housing in the open countryside, such as through conversion of suitable historic buildings which are well-related to services, it is recommended that policy secures these as affordable or rural workers' housing, which effectively guards against second home ownership. In some circumstances this may be impractical or inappropriate, for example a conversion which conserves a building's historic character, but its value far exceeds what a local person in affordable housing need could afford. In these circumstances a contribution in lieu and restriction to local occupancy should be considered.
- 6.7.6 Local occupancy restrictions on self-build development may provide a beneficial approach to reducing the opportunity for second home ownership in some circumstances.

#### 6.8 *Size restrictions on market/affordable sale*

- 6.8.1 Evidence presented in section 3 provides a clear indication of the housing affordability issue in the National Park. Dartmoor National Park has a housing affordability ratio of 12.43 which makes it the 28<sup>th</sup> most unaffordable Local Planning Authority area in England and Wales, excluding London.
- 6.8.2 Housing affordability is a key element in ensuring that housing is accessible to Dartmoor's communities, and thereby supports community sustainability. House sizes have clear implications on price and consequently who is able to access new homes. It is therefore reasonable for the local plan to manage property sizes to ensure the size of new housing does not exclude the communities they are intended to support. The local plan can do this by introducing policies to guide the size of both affordable and market dwellings.
- 6.8.3 The Design and the Building Environment Topic Paper introduces MHCLG's technical housing standards and recommends the new local plan adopts them. These standards are a nationally described set of housing standards which rationalise the many differing existing standards into one national standard that complements building regulations.
- 6.8.4 The standards provide a useful benchmark which can be used for the purposes of managing property sizes. They can be applied in various ways: as a maximum, minimum or a general guide.
- 6.8.5 For affordable housing there is a clear need to restrict house sizes, and they should not generally exceed the standard. For the most part Housing Associations and RSLs are self-policing on this matter – it is not in their interest to provide housing their tenants cannot afford. Intermediate housing provided by private individuals, however, can be susceptible to over-sizing to an extent which impacts their affordability to those in housing need, even after

relevant discounts are applied. In view of this it is recommended that nationally described residential space standards are applied as a maximum for affordable housing, with an overall size cap of 93m<sup>2</sup> which is equivalent to a 3 bedroom, 5 person, 2 storey dwelling.

- 6.8.6 For market housing the need to restrict house sizes is less pressing. Where market housing is delivered in the National Park it cross-subsidises the delivery of affordable housing and there is a need for the market element of schemes to be marketable, desirable and ultimately saleable at a reasonable profit margin. Notwithstanding this the properties need to be accessible to local communities who are in open market need and should not only serve a need which is outside the National Park. As such there is a need for new housing to closely reflect the residential space standards, but not be tied to them.

## 6.9 *Role of Community Led Housing*

- 6.9.1 Community led housing is where a community plays a leading role in addressing their own housing needs. There is no single definition of the term community in this context, this could form on the basis of geographical connection or a cultural/lifestyle connection. Similarly there is no strict requirement as to the form of housing, it can be self-build, via a Community Land Trust (CLT), co-housing, housing cooperative or development of a brownfield or greenfield site. The only requirement is that it is led and supported by a community with ties to the area.

- 6.9.2 Community housing currently comprises less than 1% of the UK's housing stock<sup>16</sup>. However the Community Land Trust sector has grown six fold in the last six years<sup>17</sup>. There are multiple potential benefits to community led housing:

- Local people can know their areas well and are well placed to make things happen
- They can be more willing to see the potential in difficult and small sites
- They can see the value in community uses which aren't immediately profitable
- They can build homes to suit their needs and as a result are more likely to stay in their communities
- They may provide other (non-residential) opportunities such as employment, or community space.

- 6.9.3 Policies of the Local Plan should be supportive of community led housing in principle, however it is not necessary to have policies for particular methods of housing delivery. Community-led housing should be brought forward in accordance with the local plan's strategic housing policies. In most cases community led housing will be bringing forward a higher proportion of affordable housing than required by policy and so this should not present an issue with these policies.

- 6.9.4 An exception to this is self and custom-build housing which is discussed in detail in section 6.10.

### *Recommendations for policy*

- 6.9.5 The Authority will continue to support community housing initiatives through advice and support at various points during the planning process. General policy should allow for development to take place as community led housing, a specific policy is not needed.

---

<sup>16</sup> Bringing Democracy Home, Commission on Co-operative and Mutual Housing  
<http://www.cch.coop/wp-content/uploads/2015/07/bdh-commission-report.pdf>

<sup>17</sup> <http://www.communitylandtrusts.org.uk/what-is-a-clt/about-clts>

## 6.10 *Role of Custom and Self Build Housing*

- 6.10.1 DNPA maintains a register <sup>18</sup> of those interested in undertaking custom and self-build housing development. The Authority has a duty to give suitable developments permission in respect of enough serviced plots to meet the demand for self-build and custom built dwellings in its area (over a defined period of time).<sup>19</sup>
- 6.10.2 The current Local Plan does not have a specific policy on custom and self-build housing and as such, it is considered in the same way as other types of housing. Where custom and self-build housing is proposed within Local Centres it is required to deliver at least 50% affordable housing, if one unit is delivered then this must be affordable to be policy compliant. Over the course of the last Local Plan this has had the result of requiring all self-build projects to be affordable housing.
- 6.10.3 This approach has presented difficulties. By requiring self-build to be affordable they must be built and occupied by someone who is local and in affordable housing need. By definition the occupant may not have ready access to the funds necessary to build a home or have earnings sufficient to access a mortgage on an open market property. Whilst self-build can come forward as affordable housing, there are therefore a more limited set of circumstances where an eligible local person would have the right finances to be both eligible and able to build an affordable self-build home. As a result the National Park have seen few self-build projects come forward over the last plan period, other than those which are replacement dwellings.
- 6.10.4 The Authority monitor demand for self and custom build housing via the Self Build Register. The register is maintained by the Devon Rural Housing Partnership and interested parties register their interest by completing and submitting an online form<sup>20</sup>. People are then assessed as to whether they are in affordable housing need or have a local connection. As of September 2018 there were 104 people on the register, 51 of these were assessed to be in affordable housing need and 69 were assessed to have a local connection.
- 6.10.5 In view of there being demand for self-build properties among the National Park's communities and the Authority's duty to allow scope for this need to be met there must be a shift in policy to allow more opportunity. There are various ways this flexibility could be created, allowing more opportunity spatially, removing the affordability requirement or allocating sites where there is an identified need.
- 6.10.6 Clearly the biggest obstacle to self-build housing coming forward at the moment is the eligibility criteria, many more people would be eligible and able to self or custom build if they did not have to be in affordable housing need. The level of need within communities suggests that a relaxation of the affordable requirement in favour of a model which was only restricted to occupation by local people would allow significant flexibility and better ensure the need is met, and site opportunities increase through better viability. Provision of affordable housing is however a key priority of the local plan and any relaxation of this requirement would need to be very careful that it did not create a loophole whereby the usual affordable housing requirements could be bypassed.
- 6.10.7 Custom and self-build comes with its own benefits which also need to be considered, however many of these cannot be ensured:

---

<sup>18</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/housing/register-your-interest-in-self-build-online>

<sup>19</sup> Housing and Planning Act 2016 – Clause 10 (1) 2a (2)

<sup>20</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/housing/self-build-survey>

- They can support local trades people
- Homes are tailored to the needs of the occupant, meaning also they are more likely to stay in the home and the community for longer
- There is scope for a greater variety of design and a greater opportunity for higher quality innovative and sustainable design
- It can make efficient use of land by using small or underused plots, and with a lower impact than larger scale development.

#### *Recommendations for Policy*

6.10.8 On balance it is recommended that some relaxation of the self- and custom build approach is required to help the Authority to comply with its duty to meet demand. A specific policy which makes clear how development may come forward as custom/self-build would help in this area. A model which was only restricted to occupation by local people would provide this flexibility as well as responding to a community wish to respond to second home ownership concerns. However, to ensure that this opportunity does not compete with affordable housing delivery on exception and allocated sites and undermine the local plan's principal objectives it is recommended that this opportunity is spatially limited. By requiring that self- and custom build housing is provided only within, and not adjacent to, classified settlements it should limit the extent to which it can compete with affordable housing whilst still allowing sufficient opportunities. Where a specific need is identified for a group of self or custom builders it would also be appropriate to allocate a site for custom and self-build.

#### 6.11 *Private rented sector*

6.11.1 In view of Dartmoor's poor housing affordability there has been interest in opportunities to encourage the private rental sector, especially in the open countryside where there is a need for affordable and flexible accommodation to meet the needs of rural and seasonal workers.

6.11.2 The planning system cannot control whether new or existing open market properties are made available for rent. This is something the market decides. There is therefore no scope to require properties to be rented through the policies of the local plan. However, there are two potential approaches which could provide more scope for this accommodation:

- through the creation of additional accommodation on farms to support farm diversification, this is discussed in full in the economy topic paper; and
- relaxing holiday let rental restrictions to allow for longer rents in the off peak season.

#### *Recommendations for Policy*

6.11.3 The first option is discussed in detail in the economy topic paper, it recommends that two options for creating additional accommodation are pursued on farms. Through conversion of a suitable redundant barn as part of farm diversification, or the creation of a residential annex.

6.11.4 New holiday lets are currently subject to a condition which restricts their occupation by a single person, couple, family or group for up to 28 days in any calendar year. Relaxing holiday let restrictions presents a number of issues. It would effectively change the nature of the accommodation and make it more difficult to distinguish between a holiday let and permanent residential dwelling in policy and decision making. The two types of accommodation are very different, having different impacts on a historic building and also having different needs in terms of the services and facilities needed to support them. Furthermore, the practicalities of enforcing a holiday let restriction become far more difficult

where it is relaxed. There is a strong likelihood that significantly longer rental periods, which would be necessary to bring about a meaningful change in the availability of rental accommodation, would lead to permanent occupation. The Authority already experiences a high number of applications for certificates of lawfulness where holiday let properties have been occupied contrary to their controlling condition.

- 6.11.5 In view of these issues it is felt that relaxing holiday let conditions is not a sustainable approach for addressing availability of private rental accommodation. It is therefore recommended that holiday let conditions are not relaxed. Alterations to the treatment of conversions in policy, discussed in the historic environment topic, will however help ensure that there is more flexibility for permanent dwellings to come forward.

## 6.12 *Gypsies and travellers*

- 6.12.1 The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
- 6.12.2 A 2006 Devon-wide Gypsy and Traveller Housing Needs Assessment identified a need for no permanent pitches and 27 transit pitches within Dartmoor National Park along the A38 and A30 corridor. This need was reflected in Policy DMD29 which set out an assessment matrix for assessing transit site proposals.
- 6.12.3 The most recent 2015 Gypsy and Traveller Accommodation Assessment for Devon<sup>21</sup> indicated a very low level of need for Dartmoor National Park (0.2 pitches per year). Given this, it is not appropriate for the new Local Plan to identify a permanent or transit pitch target for Gypsy and traveller sites. It would also therefore be inappropriate to retain the assessment matrix which is currently an overcomplicated approach which may be simply achieved through a criteria based policy.

### *Recommendations for policy*

- 6.12.4 On the basis that there is a very low level of need for Gypsy and traveller sites in Dartmoor National Park it is recommended that a criteria based policy is used to allow suitable sites to come forward where a need is identified. Consistent with Government Guidance<sup>22</sup>, such a policy would need to take into account:
- peaceful and integrated co-existence between the site and the local community
  - access to and availability of health and education services and infrastructure
  - a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
  - local environmental quality, and health and well-being, and vulnerability to flood risk
  - the potential inherent sustainability of traditional lifestyles
  - the development must also comply with relevant building regulations and health and safety requirements.
- 6.12.5 Sites for Gypsy and traveller accommodation should be well related to classified settlements. Where a three tier settlement strategy is pursued it should be carefully considered whether this type of development is appropriate for Dartmoor's smallest and

---

<sup>21</sup> <https://exeter.gov.uk/media/1701/gypsy-and-traveller-accommodation-assessment-2015.pdf>

<sup>22</sup> Planning policy for traveller sites (Department for Communities and Local Government August 2015) <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

most sensitive settlements. The criteria based policy should require that suitable sites for Gypsy and traveller accommodation:

- take a sequential approach, considering previously developed land first
- be within a reasonable and safe walking or cycling distance of the centre of the settlement
- have a safe suitable highway access
- have reasonable access to utilities, with any new telephone or electricity connections being placed underground
- be of a size which is proportionate to the adjacent community
- Be consistent with other relevant policies within the Local Plan, including matters of landscape character, tranquillity, and the natural and historic environment.

### 6.13 *Low impact development / one planet development*

- 6.13.1 A fundamental principle of the NPPF's environmental ambition is supporting a transition to the low carbon economy, through encouraging the reuse of existing resources and use of renewable resources (including renewable energy). The NPPF appreciates that planning plays a key role in delivering a low carbon economy which is central to the economic, social and environmental aspects of sustainable development.
- 6.13.2 There is a growing movement of people who genuinely wish to live differently and take it upon themselves to pursue development and a lifestyle which is far more sustainable and low impact than what is considered normal in the 21<sup>st</sup> Century. Sustainable both in terms of energy consumption and ecological footprint and which ultimately achieves a level of symbiosis between people and the environment. This means not only being broadly self-sufficient, but doing so in a way which has no significant environmental impact and ideally brings significant environmental enhancements.
- 6.13.3 Low impact development is not explicitly referred to in the NPPF, but is understandably becoming an increasingly attractive form of development, lifestyle and area of academic study in the face of national<sup>23</sup> and international<sup>24</sup> pressure for ever more sustainable approaches to development and the need to address the problem of climate change. The absence of specific reference to this type of development, permaculture or other associated land management practices in national planning policy does not signify its unimportance, just that it remains a relatively uncommon and specialised practice. There can be an inherent value in the development of and scientific experimentation with sustainable technologies and agricultural practices which a low impact lifestyle facilitates<sup>25</sup>.
- 6.13.4 Low impact development is most likely to come forward in isolated countryside locations where it is most likely to have an impact on natural beauty, landscape character, wildlife and therefore potentially conflict with National Park purposes to conserve and enhance these assets. Whilst there is no in principle objection to low impact development in or adjoining settlements, subject to design considerations, it is reasonable to expect the low income nature of this lifestyle will often render these sites prohibitively expensive or contrary to land owners expectations.
- 6.13.5 Para 79 of the NPPF advises Local Authorities to avoid new isolated homes in the countryside unless there are special circumstances, such as the essential need for a rural worker to live permanently at or near their place of work in the countryside. This definition of rural worker could extend to a resident of a low impact development where it was

---

<sup>23</sup> Climate Change Act (2008)

<sup>24</sup> United Nations (2015) '*COP21 Paris Climate Conference*'

<sup>25</sup> Planning Inspectorate (23 August 2007) '*Land at Allaleigh Lane, Totnes*'

underpinned by a viable business and there was an essential need for them to live on-site to ensure the proper functioning of the enterprise. In functional terms this should relate to unexpected situations which might arise where workers are needed to be on hand outside of normal working hours for the particular enterprise, for example to deal with an emergency that would threaten the continued viability and existence of the enterprise without immediate attention. Although it is theoretically possible for low impact development to meet these criteria, the reality is almost will not be able to produce sufficient product and also meet their own needs and this policy does not take into consideration the inherent value of doing this.

- 6.13.6 A significant obstacle exists for low impact development in a countryside location to not impact on the National Park's special qualities and this must not be underestimated. Invariably, sites where low-impact development would not have an unacceptable impact on landscape character, natural beauty or wildlife are significantly fewer inside the National Park, compared with outside. Most appropriate sites are likely brownfield sites or areas of degraded landscape where significant enhancements can be delivered. This obstacle has been highlighted by the recent appeal decision at Steward Wood where it was found the development (intended as low impact) had an unacceptable impact on a Section 3 woodland of conservation importance<sup>26</sup>.
- 6.13.7 In Wales the adoption of the One Planet Development policy<sup>27</sup> has formalised one possible approach for consideration of low impact development by the planning system. The One Planet Development policy is the most detailed of its kind in the UK and adopts a thorough quantitative and qualitative approach for assessing a development's sustainability credentials.
- 6.13.8 One Planet Development policy recognises that it is not practically possible for all food needs of occupants to be produced on-site given seasonal changes in productivity and the need for a balanced diet. It also recognises that other basic needs (e.g. clothes, travel, council tax, IT) will require a monetary income. It is therefore the expectation that sites need to earn sufficient income to meet their occupant's needs, predominantly from produce grown on-site, but this can also be through training, education courses, or consultancy directly linked to the land based activities so long as these activities are subordinate to the main produce growing/rearing activities.
- 6.13.9 The essential criteria of One Planet Development are as follows:
- 65% of basic food needs of all occupants should be met from produce grown and / or reared on the site or purchased using income derived from other products grown and reared on the site. A minimum of 30% of basic food needs should be from food grown on-site and up to 35% may be acquired using the income or surplus produce from other produce grown or reared on-site (e.g. timber, biomass etc.).
  - The basic domestic needs of all households are met from income derived produce grown and reared on-site and other income streams derived from the productive and regenerative capacity of the site. This can include training, education or consultancy services directly linked to land based activities on the site, but these should be subsidiary to the primary activity of growing and rearing produce.
  - The number of occupants is directly related to the ability of the site to support their minimum food and income needs and the number of people needed to run the site effectively
- 6.13.10 In addition to the above, contributory criteria which further the site's sustainability credentials include, providing produce to local markets thereby reducing the footprints of buyers,

---

<sup>26</sup> Planning Inspectorate (10 August 2016) '*Land at Steward Wood, Moretonhampstead*'

<sup>27</sup>Welsh Assembly Government (2010) '*Planning for Sustainable Rural Communities*'



facilities are made available to other local producers, training, educational courses or consultancy are offered as components of the land based enterprise to share best practice.

6.13.11 It is the intention of the One Planet Development policy to create development which forms part of the social and economic fabric of the countryside and should not be overly isolated. Important to this is the site's relationship to nearby settlements. Given absolute self-sufficiency is not a realistic expectation of low impact development, connectivity with nearby settlements will likely be necessary and development proposals should clearly set out in a transport assessment how the movement of residents and guests to and from the site can be achieved sustainably by reducing the need to travel and favouring low carbon modes of transport. In most cases this will require that low impact development sites are located in easy cycling or walking distance of one of the National Park's larger settlements.

6.13.12 The Welsh One Planet Development policy requires robust evidence be submitted demonstrating compliance with the policy's strict criteria, as summarised in table 6.

<b>TABLE 6 – One Planet Development Planning Application Submission Documents</b>
<b>Business and Improvement Plan</b>
Identify whether there is a need to live on the site. Quantify how the inhabitants' requirements in terms of income, food, energy and waste assimilation can be obtained directly from the site. Demonstrate land use activities proposed are capable of supporting the needs of the occupants, even on a low income or subsistence basis, within a reasonable period of time (no more than 5 years).
<b>Ecological Footprint Analysis (EFA)</b>
EFA measures the impact of human activity upon the environment. The footprint analysis provides a notional figure for the land area required to support an individual, a family or a community in terms of food, resources, energy, waste assimilation, and greenhouse gases mitigation. Developments are required to initially achieve an ecological footprint of 2.4 global hectares per person or less in terms of consumption and demonstrate clear potential to move towards 1.88 global hectare target over time.
<b>Zero Carbon Analysis</b>
Developments are expected to achieve zero carbon status in terms of the construction and use of the development.
<b>Biodiversity and Landscape Assessment</b>
A baseline assessment of biodiversity and landscape character should be undertaken to quantify environmental impact.
<b>Community Impact Assessment</b>
Undertaken to assess any potential impacts (positive and negative) on the host community and provide a basis to identify and implement any mitigation measures that may be necessary.
<b>Transport Assessment and Travel Plans</b>
Planning applications should be accompanied by an assessment of the traffic generated from the use of the site by its residents and visitors. The travel plan accompanying the planning application should clearly identify a preference for low or zero carbon modes of transport including walking, cycling and car sharing schemes. Where proposals are distant from larger towns and villages they should be located near public transport routes to minimise use of the private car.

6.13.13 The One Planet Development Policy recommends tying the Management Plan directly to a planning condition or S106 agreement, thereby providing control over agreed activities. An annual monitoring report is required to be submitted to the Planning Authority evidencing compliance with the Management Plan. Any dwellings would also be tied to the enterprise by condition or S106 and any change in ownership would require a new management plan to be agreed.

### *Recommendations for policy*

6.13.14 Policy DMD30 is a criteria based policy which sets out the Authority's approach to low impact development. Whilst clearly setting out criteria successful applications will be expected to meet, the policy does not offer a quantitative definition of low impact development.

6.13.15 The benefit of the One Planet Development policy is it sets out a clear and unambiguous methodology against which development proposals can be assessed. In adopting this approach, however, there is a risk of drawing attention to a development practice which competes and will often conflict with National Park purposes. Yet removing the policy entirely may well make the National Park's valued assets more vulnerable to this style of development given its positive consideration by the Planning Inspectorate in the past.

6.13.16 For the benefit of those wishing to genuinely pursue a low impact lifestyle, officers assessing applications and the wider communities which these developments may affect, it is recommended a more rigorous and aspirational definition of low-impact is set out based on One Planet Development principles. Recommendations include:

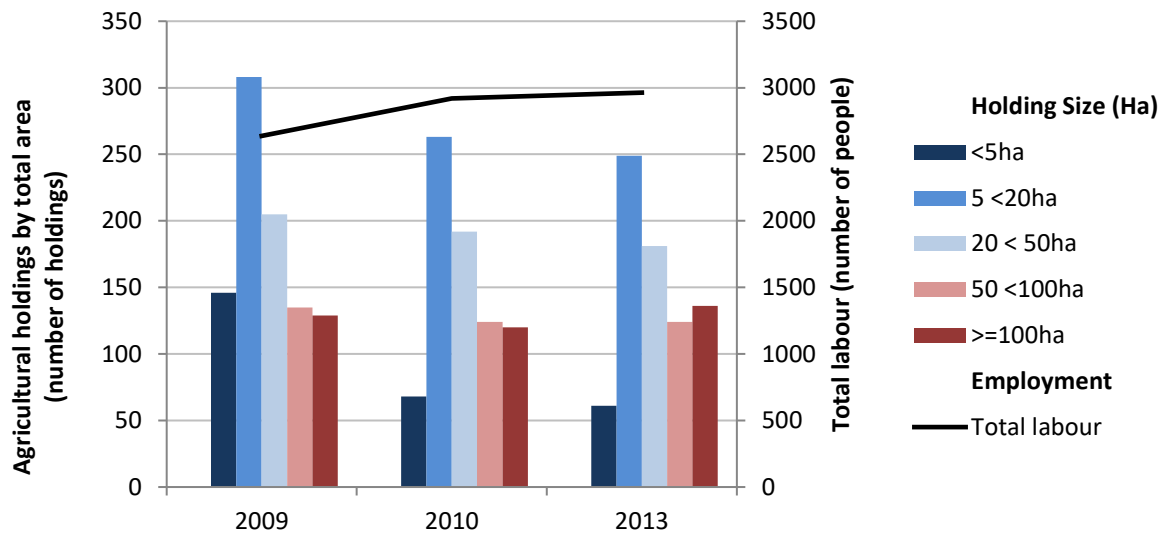
- Using Ecological Footprint Analysis adopt a quantitative definition of low impact which all low impact development will be expected to meet in no less than five years from commencement of development
- Require that all structures are carbon zero in both construction and use and assessed through carbon analysis (not Code for Sustainable Homes)
- Emphasise the difficulty for low impact development in the open countryside to comply with National Park purposes and that the most likely acceptable locations are brownfield sites or areas of degraded landscape which are of no intrinsic historic, cultural or ecological significance
- Require Management Plans be used to provide sufficient information for the development to be clearly understood and set out a programme of monitoring should the development fail to achieve the required criteria set out. The Management Plan should be tied to the development through condition or S106 and Annual Monitoring Reports be submitted to evidence compliance.
- Require that at least 65% of all basic food needs of occupants are met through on-site food production (including up to 35% using the income or surplus produce from other produce grown or reared on-site).
- Require planning applications to include an assessment of traffic generated by residents and visitors and emphasise that zero or low carbon modes of transport should be prioritised
- The basic domestic needs of all households are met from income derived produce grown and reared on-site and other income streams derived from the productive and regenerative capacity of the site
- Emphasise building regulations approval for certain structures is no different to that in any other location

### 6.14 *Rural workers' accommodation*

6.14.1 There is an increasing demand for dwellings in the countryside from all sectors of the community, caused by a shortfall in affordable housing supply and the desirability of the National Park. On Dartmoor this has led to rising house prices and an increase in pressure to sell desirable countryside dwellings, many of which used to accommodate agricultural and other types of rural worker. Rural workers' are workers of land-based enterprises located in the countryside, traditionally they have comprised of agriculture and forestry workers, but more recently including equestrian, horticultural and other rural land-based

enterprises.

6.14.2 The separate sale of farmhouses, divorced from the rest of the farm, has brought about the loss of much needed residential worker accommodation. Although farm numbers are decreasing, see Figure 4, there remains a clear and continuing need for agricultural workers' dwellings. This is evident by the number of planning applications received, see Figure 5.



**Figure 4 - Total agricultural labour force and agricultural holdings by total area within Dartmoor National Park<sup>28</sup>**

6.14.3 Given the continuing demand for rural workers' dwellings in the open countryside and the National Park's status as a protected landscape there is a clear need to ensure rural workers' dwellings are only approved where they:

- conserve and enhance the National Park's Special Qualities;
- demonstrate a real need, and not create need artificially or unnecessarily such as through the severance of land; and
- remain affordable and connected with the land and/or enterprise so the farm unit has the best chance of remaining affordable to future prospective tenants or owners.

6.14.4 The National Park Authority currently seeks to achieve this by:

- requiring evidence to demonstrate there is a clear functional need for a full-time worker to be readily available at most times;
- controlling the size of accommodation so that dwellings remain relatively affordable;
- appending a condition to all approvals requiring the dwelling be occupied by somebody solely or mainly working, or last having worked in agriculture or forestry; and,
- ensuring applications are supported by an Agricultural Appraisal which demonstrates the enterprise has been established for at least three years, is financially sound and has a clear prospect of remaining so.

6.14.5 Policy DMD23 sets out the conditions that new rural workers' accommodation has to meet. Policy DMD28 also allows temporary use of a residential caravan during the establishment

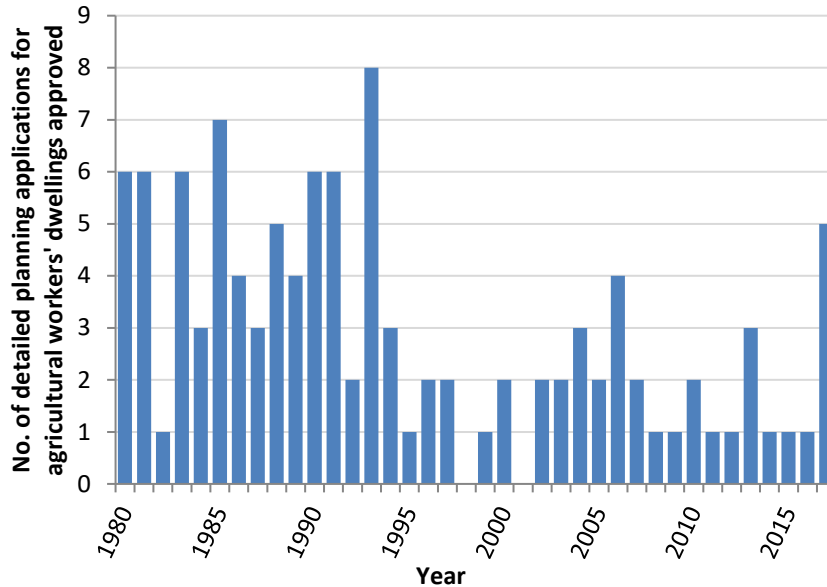
<sup>28</sup> Department for Environment, Food and Rural Affairs (2014) *Farming Statistics*

of a new farming enterprise. Policy DMD26 sets out that removal of agricultural occupancy conditions will only be supported where there is no demand for the property, demonstrated by 12 months marketing and the property is secured as an affordable home.

- 6.14.6 This approach is well established. Although it has been broadly successful at ensuring that the need for a rural workers' dwelling is well justified, it has been less successful at ensuring that rural workers' dwellings remain tied to the land they were originally intended to serve, this is particularly relevant to agricultural dwellings. Reviewing the history of agricultural approvals in the National Park shows clearly that there is very high demand for removing the ties, even on established farmsteads where dwellings are within 'sight and sound' of farm buildings.
- 6.14.7 Since 1980 110 agricultural worker's dwellings have been approved in the National Park, see Figure 5. Of the 94 dwellings approved between 1980 and 2007<sup>29</sup> 15 subsequent applications to remove the agricultural ties were received, representing 16% of all those granted permission. 8 of these applications were successful (8.5%), mostly via certificates of lawfulness, 1 application which was allowed at appeal because of land severance. Of the 15 applications 13 were within sight and sound of agricultural buildings, in some cases immediately adjacent. Land severance was a recurring theme for seeking removal of an occupancy condition. It is also worth noting that these cases only represent the cases which got to application, which would likely have been against Officers' very strong preliminary advice as there is a clear policy position on the matter.
- 6.14.8 This evidence demonstrates that removal of agricultural ties continues to be a desirable route to a market house in the open countryside of the National Park. Likely caused by the National Park being a desirable place to live and the associated high house prices which can be commanded encourage applicants to challenge the condition. However, the practice clearly fundamentally undermines the National Park's strategic aims and is unsustainable over the long term, directly undermining landscape conservation efforts which the NPPF gives great weight to. It is both reasonable and prudent for the Authority to try and minimise this risk.

---

<sup>29</sup> These dates have been chosen on the basis that those permitted after 2007 could not have accrued the minimum 10 years to achieve a certificate of lawfulness.



**Figure 5 – Agricultural workers’ dwellings approved since 1980 (excluding horticultural dwellings)**

*Recommendations for policy*

- 6.14.9 The Authority’s existing policy for controlling the removal of agricultural occupancy conditions relies on marketing evidence to demonstrate there is no demand for the accommodation. The weakness of this approach is that if a dwelling is severed from its holding and marketed with even a modest domestic curtilage in a favoured rural location then it is likely to command a substantial price. With say 2 to 5 acres in a favourable rural setting its value is likely to be at a level, even when discounted to reflect the agricultural occupancy condition, which is far beyond the reach of a qualifying agricultural worker.
- 6.14.10 Numerous appeal decisions exist which support the position that if a dwelling has been marketed without success subject to a discount reflecting an agricultural tie then this demonstrates that the condition is no longer effective or reasonable.
- 6.14.11 A more robust approach to ensuring an agricultural workers’ dwelling remains connected to its holding, and therefore will continue to be needed to farm the land, is an anti-severance obligation. This is effectively a s106 agreement which ties the dwelling to the land holding and prevents fragmentation. Requirement for the obligation would need to be clearly stated in strategic policy to ensure it was a requirement for all applications.
- 6.14.12 To ensure the obligation didn’t unduly constrain the buying and selling of land associated with the holding and therefore unreasonably restrict agricultural businesses it is recommended the s106 include a provision stating that variation requests are unlikely to be refused provided they maintain the required extent of land associated with the holding for it to remain viable and capable of supporting the associated dwelling(s). A provision setting out that consent would be deemed to have been given where the Authority did not respond within a given time period (e.g. 14 days) would also ensure these matters are dealt with in a timely manner.
- 6.14.13 As anti-severance obligations also restrict the ability for owners to lease land it is also recommend to include flexibility in policy to allow for up to 25% of the landholding to be left untied so that it may be leased out or sold to respond to an enterprise’s changing needs,

provided the extent of land tied to the enterprise is sufficient for it to remain viable and capable of supporting the associated dwelling(s).

6.14.14 In view of the recommendation to use national space standards to guide the size of affordable housing, it is also recommended that agricultural dwellings follow these standards. It is recommended that the size of the dwellings reflects the need of the occupier and a maximum size of 106m<sup>2</sup> is introduced. This is equivalent to a 2 storey, 4 bedroom, 6 person house, inclusive of storage, boot and equipment rooms. An excessive curtilage, garage or outbuildings should not be acceptable because of their impact on affordability, a modest car port may be.

**Table 7 Sample of Agricultural workers dwelling 2010-2014**

No. of Bedrooms	Dwelling Size(m <sup>2</sup> ) (exc. Ancillary)			Ancillary Accommodation (m <sup>2</sup> ) (boot room. Office, utility etc.)	TOTAL (m <sup>2</sup> )	Officer Recommendation
	< 95m <sup>2</sup>	96m <sup>2</sup> – 150m <sup>2</sup>	> 151m <sup>2</sup>			
4+			244	26	270	Permission Granted
4+			277	-	277	Recommended for Refusal
3		145		22	167	Permission Granted
3			179	-	179	Permission Granted
4+			228	84	312	Recommended for Refusal
3			158	-	158	Permission Granted
2		112		-	112	Permission Granted
4+			154	22	176	Permission Granted
3		150		20	170	Permission Granted
2	85			-	85	Permission Granted
3	92.5			-	92.5	Permission Granted
4+		145		25	170	Permission Granted
3	85			21	106	Permission Granted
3		140		26	166	Recommended for Refusal

## **7 Delivery: different types of site and development**

### *7.1 Allocated sites*

7.1.1 NPPF para 23 states “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies [than strategic policies] for specific areas, neighbourhoods or types of development. This can include allocating sites.”

7.1.2 The current Local Plan (Development Management DPD 2013) identifies 17 allocated sites across 8 settlements. This totals 24ha of land of which 8.6ha is previously developed land, and 15.7ha is greenfield. At the time of writing 5 allocated sites had been completed with others at various stages of the planning system, including 1 with planning permission and 2 others having had outline planning permission refused.

7.1.3 The Vision and Settlement Strategy Topic Paper discusses in detail the pros and cons of using allocations to guide future development. The topic paper considers the principle and scale of allocation, and how allocations interact with other opportunities in policy to ensure there is sufficient opportunity to meet local needs. The Topic Paper recommends:

“On the basis of the above discussion it is recommended that sites should be allocated in Local Centres, that on balance it would not be appropriate to allocate sites in Rural Settlements, and it would not be recommended to allocate sites in the Villages and Hamlets. It may be considered that site allocations happen at a more limited scale, with longer term and alternative opportunities provided through a more flexible community needs led policy to allow for some smaller scale development to come forward.”

7.1.4 Site allocations remain a key means to ensure that development in the National Park meets identified local housing needs and that the National Park’s housing number is met. Allocating sites in local centres remains an important way of ensuring the majority of the National Park’s housing growth comes forward in planned locations, giving the community certainty.

7.1.5 The relatively small levels of growth planned in Rural Settlements and Villages and Hamlets means that it should not be necessary to allocate sites in these smaller settlements. Providing more flexibility in the policies affecting Rural Settlements together with a more flexible exception site policy is discussed in Section 7.7.

7.1.6 The practice of allocating sites is recommended to continue and the Development Sites Topic Paper has explored potential site allocations based on available land identified in the Housing and Economy Land Availability Assessment (HELAA). The final selection of recommended sites are as follows. Approximate site yields have been determined by analysing the density of approved schemes of 7 or more units over the last plan period and using industry assumptions for site developable areas. The following assumptions have therefore been used:

- an average of 35 dwellings per hectare
- developable area of 100% for sites under 1Ha and 80% for sites of 1Ha or more; and
- in certain circumstances the HELAA recommended that site yields be limited because of site constraints and these recommendations have been used where relevant.

**Table 8 Draft Local Plan site allocations**

<b>DMD Ref</b>	<b>New LP Ref</b>	<b>Address</b>	<b>Settlement</b>	<b>Allocated site area</b>	<b>Indicative yield (units)</b>
<b>ASH1</b>	7.3	Longstone Cross	Ashburton	1.44	40
<b>ASH2</b>	7.4	Chuley Rd	Ashburton	3.54	45
	7.22	Axminster Carpets	Buckfast	4.30	40
<b>BCK1</b>	7.5	Barn Park (land adj Wallaford Road)	Buckfastleigh	0.76	26
	7.6	Holne Road	Buckfastleigh	1.73	28
<b>CHG1</b>	7.7	Lamb Park	Chagford	1.29	36
<b>HOR2</b>	7.9	New Park	Horrabridge	1.26	35
<b>MTV2</b>	7.24	Down's Garage	Mary Tavy	0.51	19
<b>MTN2</b>	7.12	Thompsons (Station Rd)	Moretonhampstead	0.95	26
<b>MTN1</b>	7.11	Forder Farm (Chagford Cross)	Moretonhampstead	0.73	25
	7.10	Betton Way	Moretonhampstead	0.54	18
<b>SBR1</b>	7.16	Adj Fairfield	South Brent	1.03	36
	7.15	Palstone Lane b	South Brent	1.28	34
	7.14	Palstone Lane a	South Brent	0.44	15
	7.20	Binkham Hill	Yelverton	1.48	41
	7.19	Elfordtown	Yelverton	2.00	40

## 7.2 Small sites

- 7.2.1 NPPF paragraph 68 states: "To promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved."
- 7.2.2 This requirement relates to 10% of the overall housing requirement, rather than just that related to allocated sites. One reason for the introduction of this policy is to help ensure sufficient opportunity for small-builders to compete with volume house builders.
- 7.2.3 Development on smaller sites forms a good proportion of housing delivery in the National Park, due to the focus on affordable housing limiting overall development site size, and the appropriateness of smaller sites within Dartmoor's smaller communities and sensitive landscape. The proposed spatial strategy enables opportunities for infill development within a broader range of settlement than in the current Local Plan, as well as an exception site policy within all settlement types, which will almost certainly lead to a good proportion of development on smaller sites.

### *Recommendation for policy*

- 7.2.4 That appropriate opportunities exist for small development sites to come forward, but that it is recognised that the majority of Dartmoor's appropriate development sites (including allocated sites) are still small in the context of national policy, and therefore the principal driver should be the most appropriate sites and schemes, rather than a pursuit of national policy for its own sake.

## 7.3 Infill sites

- 7.3.1 The discussion in 2.5 describes context in respect of smaller sites and setting an appropriate threshold, or not, for affordable housing. It is considered reasonable that in the National Park context a case may be made for a low threshold; justified in principal on the



basis of the high demand for affordable housing, and the important contribution that small sites can, do and reasonably should make in a protected landscape where land resources are limited.

- 7.3.2 The thrust of government policy on affordable housing threshold is the viability and deliverability of sites, and the need to avoid unreasonable burdens upon smaller sites in particular. On this basis the viability appraisal has been undertaken including a range of test studies which includes smaller sites.
- 7.3.3 Issues consultation produced two clear views from community response which do not necessarily sit comfortably with each other, and government policy. Firstly, communities were keen to see a greater level of opportunity in a broader range of settlements. It is proposed in the draft Local Plan that this can be addressed through the additional middle tier in the settlement strategy, and opportunities for infill development within this tier. Second communities wish to sustain a focus upon affordable housing. How these two drivers are reconciled with government policy is therefore challenging
- 7.3.4 The key policies interacting in this area are:
- Government policy
  - Community desire for small sites
  - Need for affordable housing
  - Need to support opportunities for working families and older downsizers
  - Opportunities for off-site contributions where affordable housing is not appropriate
  - Strategic priority of maximising the use of all land
  - Strategic priority to maximise the use of brownfield land
  - Opportunities to increase level of self-build

#### *Recommendation*

- 7.3.5 Given that small sites are demonstrated to be viable, and the above policy interactions it would be reasonable to take forward a flexible approach which –
- Enables small sites to come forward
  - Prioritises brownfield opportunities
  - Provides flexibility for viability, with opportunities for affordable housing, off-site contributions towards affordable housing, and local needs self-build development

#### 7.4 *Off-site contributions*

- 7.4.1 Government advice has previously described off-site contributions in lieu of affordable housing as being only justified in exceptional circumstances. However with the NPPF's affordable housing threshold advocating off-site contributions on certain smaller sites, it is clear that government considers it reasonable to occur in more circumstances. The NPPF (2018) states:

*Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*

*a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*

*b) the agreed approach contributes to the objective of creating mixed and balanced communities (Para 62)*

- 7.4.2 National policy recognises that providing affordable housing on small development sites can

be difficult to achieve. There is therefore an opportunity for the Local Plan to provide some flexibility in how affordable housing can be provided on small sites to ensure policy is not unduly restrictive. This may be achieved by allowing financial contributions (or ‘commuted sums’) in lieu of affordable housing on-site. Particular opportunities for this exist where development of affordable housing may not be achievable, or appropriate in particular circumstances. The Local Plan should therefore be clear where these circumstances exist and therefore when commuted sums may be appropriate.

- 7.4.3 Importantly, off site contributions should be equivalent to on-site provision. The developer should be no better or worse off for having provided an off-site contribution. In respect of viability of development off-site contributions can, though, have both positive and negative effects depending on the circumstances. For example, a scheme seemingly ‘unencumbered’ by affordable housing may achieve open market values at a greater level, given the negative perception which can exist around affordable housing. On the other hand, affordable housing which is being bought on a S106 site by a Registered Provider can improve cash flow and provide guaranteed sale, meaning some developer can see it more favourably.
- 7.4.4 DNPA has previously commissioned a study from Three Dragons to consider the merits of a standardised approach to commuted sums. Whilst the Report identified what reasonable sums would be, the range of scenarios and value areas meant that a standard commuted sum would either be very complex to implement, or would be so general as to be unviable in some areas, whilst significantly undervaluing the potential contribution in other areas. For this reason, and given the relatively limited circumstances in which commuted sums are used, DNPA has undertaken to assess commuted sums on a case by case basis, using a residual value approach as taken through viability appraisal.

#### *Recommendations*

- 7.4.5 In Local Centres and Rural Settlements, where the majority of housing growth is planned, financial contributions in lieu of on-site affordable housing provision on small sites of: up to 5 units in Local Centres; and up to 3 units in Rural Settlements, would be appropriate. This would align with the discussion/recommendations regarding smaller sites at 7.3. Importantly, the presumption in favour of delivery on site remains, and whilst in some cases it may be the best option to provide an off-site contribution, it should be demonstrated that on site affordable housing provision is not achievable.
- 7.4.6 In Villages and Hamlets and in the open countryside, where there is a stronger level of need for affordable housing and the environment is more sensitive, the approach should be more restrictive, with clear criteria required, as described above. Here financial contributions should only be acceptable where the proposal involves the creation of one or more new dwellings which comply with Local Plan policy, but provision of affordable housing is inappropriate because of:
- the anticipated market value (e.g. being too expensive to be an affordable dwelling)
  - the feasibility of converting or adapting the building (e.g. building works are too complex and/or costly)
  - the impact the conversion or adaptation would have on the building (e.g. where the building works would harm a heritage asset).
- 7.4.7 Given the range of land and property values, and potential build costs across the National Park, financial contributions in lieu should be negotiated on a case by case basis. These sums should be calculated on an equivalent basis, i.e. the contribution would be equivalent to the provision of an affordable dwelling on-site. The principle being that the developer of a scheme should be no worse or better off where they provide the affordable housing required

on-site or as a financial contribution. The calculation of a commuted sum would therefore be based upon the difference between the value of a development providing the required amount of affordable housing in line with policy, and the value of that development as 100% market housing.

- 7.4.8 Applications which propose a contribution in lieu must therefore be supported by a viability appraisal and we will seek independent verification of this appraisal, as required, by a suitable professional instructed by the Authority and at the applicant's cost.
- 7.4.9 Given the potential for an increased use of commuted sums under proposed Local Plan policy, DNPA should keep under review the case by case approach, should the level of off-site contributions mean that a standardised/formula approach may become more reasonable.
- 7.4.10 If the level of commuted sums received does increase, DNPA will need to establish a clear process and protocol for the administration and allocation of funding for affordable housing. The most reasonable process would be to achieve this through arrangement with the Housing Authorities.

## 7.5 *Rural Exception Sites*

- 7.5.1 The 2018 NPPF defines rural exception sites as:

“Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.” (Glossary)

- 7.5.2 NPPF paragraph 77 states:

“In rural areas, planning policies and decision should be responsive to Local circumstances and support housing developments that reflect local needs. Local planning Authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”

- 7.5.3 Policy COR15, DMD21 and DMD22 of Dartmoor's current local plan establish that exception sites may be brought forward in locations adjoining classified local centres and rural settlements. There is an expectation of 100% affordable housing provision on these sites. However, to allow flexibility the Authority's Affordable Housing SPD<sup>30</sup> sets out that up to 25% open market cross-subsidy may be permissible where the scheme is not viable at 100% and the land value reflects a development value for affordable housing only.
- 7.5.4 This policy approach has successfully allowed for affordable housing to be brought forward on 5 sites throughout the National Park during the plan period, totalling 39 affordable units. None of these sites required cross-subsidy.

---

<sup>30</sup> DNPA, Affordable Housing SPD  
[http://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0009/896382/2014-06\\_09\\_Affordable\\_Housing\\_SPD\\_ADOPTED-FINAL.pdf](http://www.dartmoor.gov.uk/_data/assets/pdf_file/0009/896382/2014-06_09_Affordable_Housing_SPD_ADOPTED-FINAL.pdf)

7.5.5 Viability testing<sup>31</sup> on sites of 100% affordable shows that it is very marginal in viability terms and in some situations will not be achievable, particularly where there are additional on-site costs. The option for 25% cross subsidy therefore serves as an important element of policy which supports development viability. This should be translated into the revised local plan policy, rather than be relied upon through the SPD, along with associated conditions related to land value.

7.5.6 On this basis it is recommended to retain the local plan's exception sites policy in broadly its existing format and, for clarity, transfer requirements from the affordable housing SPD into strategic policy.

## 7.6 Entry-level Exception Sites and Starter Homes

7.6.1 The 2018 NPPF introduced a new type of exception site, the entry-level exception site. These sites are defined in paragraph 71 of the NPPF where it states:

*“Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area. These sites should be on land which is not already allocated for housing and should:*

*a) comprise of entry-level homes that offer one or more types of affordable housing as defined in Annex 2 of this Framework; and*

*b) be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework, and comply with any local design policies and standards”.*

7.6.2 Footnotes associated with para 71 clarify that entry-level exception sites should be no larger than 1Ha in size or exceed 5% of the size of the existing settlement (footnote 33). Footnote 34 clarifies that areas of 'particular importance' include National Parks, stating “Entry-level exception sites should not be permitted in National Parks (or within the Broads Authority), Areas of Outstanding Natural Beauty or land designated as Green Belt”

7.6.3 The NPPF does not specifically define what a home suitable for first time buyers is. However, it is deduced that it is most likely associated with the government's starter homes model which was introduced in the 2016 Housing and Planning Act<sup>32</sup>. The NPPF includes starter homes as a type of affordable housing and states that starter homes are defined in sections 2 and 3 of this Act and any secondary legislation under these sections available at the time of plan-making. At the time of writing this topic paper there was no such secondary legislation.

7.6.4 Section 2 and 3 of the 2016 Housing and Planning Act state that a starter home means a building or part of a building that:

- is a new dwelling
- is available for purchase by qualifying first-time buyers only,
- is to be sold at a discount of at least 20% of the market value,
- is to be sold for less than the price cap, and
- is subject to any restrictions on sale or letting specified in regulations made by the

---

<sup>31</sup> DNPA, Whole Plan Viability Assessment 2018  
[http://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0007/1416499/DNPA-Whole-Plan-Viability-Assessment-FINAL-REPORT.pdf](http://www.dartmoor.gov.uk/_data/assets/pdf_file/0007/1416499/DNPA-Whole-Plan-Viability-Assessment-FINAL-REPORT.pdf)

<sup>32</sup> <http://www.legislation.gov.uk/ukpga/2016/22/contents/enacted>

Secretary of State.

7.6.5 The definition does not state whether the discount is temporary and it is therefore implied that the 20% discount applies on the first and every subsequent sale. In many ways this makes the housing model similar to the National Park's intermediate affordable housing model, except that it is only eligible to qualifying first-time buyers which are defined in the legislation as meaning an individual who:

- is a first-time buyer,
- is at least 23 years old but has not yet reached the age of 40, and
- meets any other criteria specified in regulations made by the Secretary of State (for example, relating to nationality).

7.6.6 As the Authority have experienced with its own intermediate affordable housing model, this additional age restriction will likely have implications on mortgageability and serve to increase the interest rate lenders are willing to offer mortgages at. Albeit in this circumstance the age restriction would be in place of a restriction requiring future occupiers to be in affordable housing need and, as such, its effects would be comparable. It is also interesting to note that given the National Park's ageing population and falling working age population which is forecast to significantly worsen over the plan period, the market for first-time buyers in the National Park is likely in decline. Whereas as Dartmoor's housing affordability ratio continues to steadily rise the market for affordable properties is likely to increase over the plan period.

#### *Recommendations for policy*

7.6.7 Given that the NPPF now includes starter homes in the definition of affordable housing, and as such will be included in the revised local plan's definition, there should be sufficient support for this product to come forward on an exception site basis in the National Park. Starter homes would form part of the 100% affordable housing expectation that exist on exception sites and would be acceptable provided that they met an identified housing need. To identify need it may be necessary to tailor a Housing Needs Assessment to ensure it asks the right questions to identify need,

#### *7.7 The need for community infrastructure*

7.7.1 Various consultation exercises have identified that there is a need for various small-scale community infrastructure improvements. The Infrastructure Delivery Plan<sup>33</sup> identifies specific needs. There is a recurring issue around car parking which is often in high demand in Dartmoor's historic settlements, this issue is discussed in detail in the Transport Topic Paper<sup>34</sup>.

7.7.2 Funding, developing and maintaining infrastructure can be an enormous task for small communities. Given the amount of community infrastructure identified in the Infrastructure Delivery Plan and the uncertainty in funding much of it, there is a need to ensure that sufficient funding sources exist to support delivery.

7.7.3 One possible source of funding is through development. In exploring funding sources the following options were considered:

- CIL: The community infrastructure levy (CIL) is a planning charge introduced to

<sup>33</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0006/1180572/1909\\_Infrastructure-Delivery-Plan.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0006/1180572/1909_Infrastructure-Delivery-Plan.pdf)

<sup>34</sup> [https://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0006/1416525/2019-09-09\\_Transport\\_Topic\\_Paper\\_V3.pdf](https://www.dartmoor.gov.uk/_data/assets/pdf_file/0006/1416525/2019-09-09_Transport_Topic_Paper_V3.pdf)

support authorities to deliver infrastructure. New development creating 100m<sup>2</sup> floorspace may be liable for a charge where the local planning authority has adopted a charging schedule. However, as discussed in the Infrastructure Delivery Plan, the scale of development in the National Park means that CIL is not cost-effective and it is therefore not intended to pursue a CIL in the next plan period.

- s106 obligations: It is possible to seek contributions for infrastructure provision through s106 obligations, However, to meet the legal tests for planning obligations, the obligation must be for works which are related to the development in scale and kind. This is unlikely to be the case for community infrastructure.
- Flexible policies: it is possible to incentivise provision of community infrastructure by introducing flexibility into policy. In particular by allowing a less affordable housing provision where community infrastructure is provided.

#### *Recommendations for policy*

7.7.4 Securing funding for the provision of community infrastructure through the planning system is difficult, especially where it is not viable for a local planning authority to adopt a CIL. In recent years government has made securing contributions through planning obligations more restrictive and it is not possible to secure contributions for works which are not directly related to the development. As such, it is only possible for the National Park Authority to encourage community infrastructure provision through flexibility in policy and the requirement to provide affordable housing.

7.7.5 To ensure the plan is able to meet forecasted housing needs, it is not possible to introduce flexibility into affordable housing requirements on allocated sites. Doing so would not be sound. However, it is possible to introduce flexibility to the Authority's exception site policy. The NPPF definition of rural exception sites allows flexibility, it states 'a proportion of market homes may be allowed on the site at the local planning authority's discretion'.

7.7.6 DNPA's existing policies DMD 21 and 22 set out the Authority's approach to exception sites, they do not allow flexibility for provision of community infrastructure. Flexibility to deliver a lower proportion of affordable housing would create opportunities for funding of community infrastructure, which could provide important support for local communities. It is therefore recommended that this option be pursued, subject to the following:

- the reduction in affordable housing be proportionate to the infrastructure delivered; and
- affordable housing provision, as a minimum, be no less than that sought on an allocated site. This avoids exception sites becoming a more preferable development route than allocated sites and avoids the potential for undermining housing delivery to meet local needs.

#### *7.8 Sub-division of housing in the countryside*

7.8.1 Paragraph 79 of the 2018 NPPF sets out that planning policies and decisions should avoid the development of isolated homes in the countryside, except in a series of circumstances. The paragraph is generally consistent with paragraph 55 of the 2012 NPPF, allowing for rural workers' dwellings, homes of exceptional design quality and others, except for an addition which allows for subdivision of an existing residential dwelling.

7.8.2 Creation of new dwellings in the countryside has previously only been permitted in the National Park where there is specific justification related to the needs of a rural worker who has an essential need to live at their place of work, or other circumstances aligned with

paragraph 55 of the 2012 NPPF. The countryside has otherwise not been seen as an appropriate place for housing growth due to its isolated and unsustainable nature.

7.8.3 There are a number of positive and negative factors to take into consideration when considering pursuing subdivision of housing in Dartmoor's countryside, these are summarised below:

- there is high demand for housing in the open countryside, but its cost is often out of reach of local people
- subdivided houses will result in some smaller house sizes and likely lower house values, however the relative high cost and desirability of countryside homes are still likely to put them out of reach of many working on Dartmoor
- subdivision of larger homes could make more efficient use of Dartmoor's existing housing stock
- growth in isolated housing will lead to increased demand for car-based transport in isolated locations, impacting on transport infrastructure and worsening our impact on climate change
- many new countryside homes will have poor access to services
- many larger homes are heritage assets and pressure for subdivision will likely put pressure on significance
- Development may take place in locations where an intensification of use is not appropriate

7.8.4 Notwithstanding the above concerns the strength of NPPF wording means it is not feasible for Local Plan policy to avoid opportunities for subdivision in the countryside altogether. As such, a policy approach should be pursued which ensures that new housing coming forward via this route makes a proportionate contribution to affordable housing for local people. This can be achieved in much the same way as the Authority's recommended approach to residential barn conversions.

#### *Recommendations for policy*

7.8.5 It is recommended to allow subdivision in accordance with NPPF paragraph 79. To ensure new housing coming forward via this route makes a proportionate contribution to Dartmoor's high affordable housing needs it is recommended that new dwellings are restricted to affordable housing or rural workers' housing. In countryside locations flexibility for contributions in lieu should be restricted in the same way as barn conversions and in accordance with the Authority's existing approach to contributions in lieu set out in the Affordable Housing Supplementary Planning Document paragraph 4.7<sup>35</sup>. It should be restricted to circumstances where the provision of affordable housing is inappropriate because:

- the anticipated value of the property means it would not be affordable;
- it is not feasible to convert the building for an affordable dwelling or building works are too complex or costly; or
- the impact the conversion or adaptation would have on a building's special character would be unacceptable.

7.8.6 Any future policy should be carefully composed to ensure that any rights for extension transferred to the newly created dwelling are no more preferable than those relevant to the original dwelling.

---

<sup>35</sup> <http://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/supplementary-planning-documents/affordable-housing-spd>

## 7.9 *Amalgamation of homes*

- 7.9.1 Traditionally the amalgamation of two or more dwellings was not considered a material change of use and therefore did not require planning permission. However, in 2000 a legal case in Richmond upon Thames<sup>36</sup> successfully challenged an Inspector's decision and established that the loss of a particular type of accommodation is a material planning consideration when relevant to the context of the local development plan. It was therefore held that it should be taken into account when determining a planning application. A later case in Kensington and Chelsea<sup>37</sup> established that it was lawful to take the loss of residential units into account regardless of whether there is a policy in place.
- 7.9.2 Over the last local plan the Authority has not considered the amalgamation of dwellings to require planning permission. However, evidence emerging through the preparation of this local plan clearly indicates that the availability of smaller more affordable accommodation is an important consideration in ensuring local housing needs can be met. As discussed in various sections of this topic paper (see section 3), the availability of smaller accommodation is vital to ensuring Dartmoor retains a mix of housing sizes which can meet the needs of local people, workers, elderly downsizers, first time buyers and rural workers. The desirability of the National Park as a place to live has led house values rising far beyond what is considered affordable locally, and this trend would be worsened by the loss of smaller dwellings through development practices such as amalgamation.

### *Recommendations for policy*

- 7.9.3 Consistent with the above and this Topic Paper's evidence it is recommended that Local Plan policy clearly state that loss of dwellings through amalgamation will be resisted. To ensure this approach is applied reasonably some exceptions to this approach should also be considered in certain situations, such as:
- where amalgamation would lead to enhanced conservation of a heritage asset; and
  - where the restriction would prevent the re-amalgamation of a house following sub-division (see section 7.8)

## 7.10 *Empty homes*

- 7.10.1 When properties stay empty longer than six months without any obvious signs of renovation or rental they may be classed as 'empty homes'. The most common reasons for homes becoming empty are due to the previous occupant:
- passing away
  - moving to a hospital or institution
  - being evicted or the property repossessed; or
  - being unable to let the property due to maintenance or value issues.
- 7.10.2 Housing in the National Park is in high demand and it is a key objective of the planning system to ensure that the existing housing stock is used as efficiently as possible, including by bringing empty homes back into use.
- 7.10.3 The National Park Authority is not the Housing Authority for the National Park, this responsibility remains with the respective District Council. Each housing authority has a strategy for reducing empty homes in their area by strategies such as:

---

<sup>36</sup> Richmond Upon Thames London Borough Council v Secretary of State for the Environment, 2000

<sup>37</sup> Royal Borough of Kensington and Chelsea v Secretary of State for Communities and Local Government 2016



- Providing financial help, such as loans and grants, to facilitate works which can bring an empty home back into use
- Charities may offer lease and repair schemes under which homes are repaired for free and leased out by the charity
- In some cases enforcement action under the Housing Act 2004 may also be necessary to resolve a problem property

7.10.4 There are no powers the National Park Authority, as a local planning authority, has to directly influence empty homes and, as such it is not possible to adopt a policy which can directly intervene. Nevertheless the Local Plan's policy framework can ensure that any scope for empty homes arising while its policies are being pursued is reduced.

7.10.5 In particular, intermediate affordable dwellings have the scope to be left empty whilst an eligible local person is found. To ensure their marketing period is as brief as possible s106 legal agreements include a cascade which allows the property over time to be marketed to local persons within an increasingly large area until it reaches the entire National Park. This mechanism is discussed in further detail in section 7.16.

## 7.11 *Homes for meeting local need*

7.11.1 The 2016 Issues Paper invited views on the what constitutes a 'local person'. The definition of 'local' in the adopted Local Plan is:

(i) those people currently living in the parish of provision, or a rural parish adjacent to the parish of provision, and having done so for a period of at least five years; or

(ii) those people who have lived in the parish of provision or a rural parish adjacent to the parish of provision for a period of five years but have moved away in the past three years; or

(iii) those people who have a strong local connection with the parish of provision or a rural parish adjacent to the parish of provision by virtue of, for example, upbringing or current employment.

7.11.2 The responses to the Issues Paper were broad ranging, including as follows:

- Employed in the national park
- Ability to cater for those who have gone away and want to come back
- Consider a points system
- Living in the national park for a period of time (3/5/10/20/25 yrs)
- Someone who contributes to the community
- Current definition is appropriate

7.11.3 Largely the definition was considered to be fit for purpose. However there is potential that two dimensions of the definition could be refined. Firstly given the lack of affordable housing and the extensive anecdotal evidence of those who have been unable to find suitable housing within their community have left, the period of time over which those people may be able to return could be extended.

7.11.4 Secondly, the first point raised above regarding employment links with the evidence around the ageing population and the need to support a working age population in the National Park. What is evidence in essence, is that whilst communities wish to support housing for local people, what they are also keen to see (or perhaps at the very least) is that those homes are occupied by people who live permanently in and actively contribute to the community. On this basis it is considered that whether a person is employed locally could form a clear component of the definition. Currently the Affordable Housing SPD expands on

point (iii) above, describing in more detail what constitutes a strong local connection. It sets out that a strong local connection could include:

*“a person who is employed (for not less than 16 hours per week) in the parish of provision or whose work is primarily carried out within the parish, having done so for a continuous period of at least 2 years”*

- 7.11.5 Given the clear affordability difficulties workers experience trying to live within the National Park, lowering the total amount of time an eligible person has to have been working should also be considered. Attraction of younger workers could also help tackle the National Park’s ageing and falling working-age population.

*Recommendations for policy*

- 7.11.6 The definition of a local person is considered to be largely fit for purpose, however it is considered that there is opportunity for the draft Local Plan to test an expansion upon the period of time which a local person may have to return and still meet the definition (recognising that person may, in a longer absence still have a ‘strong local connection’). Also that employment should be identified separately as a criterion, rather than simply within the ‘strong local connection’ identified in supplementary guidance. It is also recommended to reduce the period someone has to be working within the National Park to attain eligibility from 2 years to 26 weeks. This strikes a balance between allowing flexibility, but also requiring some commitment.

*7.12 Restrictions in perpetuity*

- 7.12.1 The principles set out above have established clear reasoned justification for affordable housing to be retained in perpetuity. This relates, in short, to the need to make the best use of available land in the National Park where a ‘lose and replace’ approach is not appropriate. Linked with this community and landowner support for affordable housing is strongly predicated on its value as a ‘community asset’ which will form part of the mix of stock in a settlement and be available to meet future affordable housing needs. S106 Agreements will therefore include the requirement that the homes remain affordable in perpetuity.

In respect of housing, S106 Agreements will be used to:

- i) Identify appropriate rent or sale price arrangements
  - ii) Set out the restrictions/eligibility for the occupation of affordable housing
  - iii) Set the arrangements, including cascades, for the occupancy of housing
  - iv) Identify any commuted sum payable, and the trigger point in the development at which it should be paid, to whom, and what it will be used for and by when.
- 7.12.2 To support the mortgageability of a property, S106 agreements will include appropriate Mortgagee in Possession Clauses. This should retain the local occupancy restriction but recognise that after a reasonable period of time a mortgagee may repossess a property.
- 7.12.3 S106 Agreement will also set the initial and subsequent selling prices of discount market/custom and self-build housing for sale as described in section 6.5. The viability appraisal will be used to ensure that this is set at the maximum discount value which is reasonable and viable in order to provide the greatest level of affordability. This will be a minimum discount sales value of 25% of open market value having already taken into account the occupancy restriction which applies to the property.

### 7.13 *Use of covenants to safeguard future sales*

7.13.1 From time to time Governments have considered extending the Right to Buy to all tenants of affordable rented housing. Whilst the National Park Authority recognises that in some cases tenants may wish to own their home we also know that the supply of affordable homes in the National Park is very limited. Once these homes are sold it is extremely difficult to replace them within the community and the National Park, as a nationally protected landscape, has limited capacity to do so. We would, therefore, support landowners who seek a covenant within the sales documentation that prevents future sale of any rented houses built on the land.

### 7.14 *Staircasing restrictions on shared ownership properties*

7.14.1 The shared ownership housing model allows buyers to purchase a portion or share of property, the initial minimum share is 25%, and the average initial purchase is usually 40%. Ownership of the remainder remains with the developer or other intermediary against which the occupier pays a proportionate rent. This allows people to build up equity in a home without having to save for a full deposit or acquire a full mortgage.

7.14.2 In some areas it is possible to buy additional shares in a shared ownership property until the occupier owns the property outright. The process of increasing ownership is called 'staircasing'. The act of buying a property in full, or 'staircasing out', means the property becomes an open market property. The only way to restart the process is to buy back the property off the occupier and start the process again.

7.14.3 In designated protected areas, such as National Parks, there is the potential for staircasing out to significantly undermine the stock of affordable housing in an area where there is limited scope to replace because of its highly constrained nature. As a result the government introduced regulations that specify a requirement for landlords to include the following condition in the lease of shared ownership houses in protected areas:

- The leaseholder's equity share is restricted to a maximum of 80% of the property's value; or
- once the leaseholder has acquired a 100% share of the house and it becomes available for resale that it is sold back to the landlord, this is also known as a pre-emption.

7.14.4 Within protected areas providers must insert one of the clauses in their leases. If the provider wishes the leaseholder to gain 100% equity there should be a covenant which states that the leaseholder agrees to sell the property back to the provider or provider's nominee at market value. If the provider is unable to buy back the property an alternative registered provider may be nominated, otherwise the owner will be able to sell on the open market after a specified timescale (usually 6 months)<sup>38</sup>.

7.14.5 The National Park Authority have always included 80% staircasing restrictions on our s106 agreements, with the intention that this effectively ensures that affordable properties are retained in perpetuity and are not lost. However, over the last local plan this approach has had some unintended consequences. Where occupants have decided to staircase out to 80% ownership they have found that the property is incredibly difficult or impossible to sell. This is because the prospect of owning 80% of a property without ever having the ability of owning all of it is not very attractive. As a result some occupiers have found themselves 'stuck' in their homes, unable to sell and unable to move. This situation fundamentally

---

<sup>38</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582207/DPA\\_explanatory\\_note.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582207/DPA_explanatory_note.pdf)

undermines the purpose of shared ownership homes, which is to help owners build up equity and move out onto the open market.

- 7.14.6 As a result of this situation many registered providers of shared ownership housing are now refusing to take them on, as confirmed in our consultation workshops on 7<sup>th</sup> December 2018 and 15<sup>th</sup> January 2018. This clearly threatens the Authority's ability to deliver this model of affordable housing. The alternative approach is to allow staircasing to 100% to occur in accordance with the process described above. This approach could lead to affordable homes being lost and should be weighed up against the local plan's priority to deliver affordable housing in perpetuity and make best use of the National Park's limited land resource.
- 7.14.7 Anecdotal evidence from registered housing providers suggests that the proportion of shared ownership properties staircasing out is very low, approximately 2-3% overall. This suggests that the risk of significant loss of affordable housing is quite low. Were the Authority to allow staircasing to 100% there would also be the opportunity to buy-back at market rates and this could be another means to spend the affordable housing fund maintained by the contribution in lieu of on-site affordable provision option proposed elsewhere in this document. Thereby ensuring the fund did not go unspent.

#### *Recommendations for policy*

- 7.14.8 Shared ownership housing is an important model for the local plan to continue to deliver and there is demand for it in Dartmoor's communities. As a result it appears that a relaxation in the staircasing restrictions is the only way that these needs will be able to be met. As a cautious approach it is recommended that staircasing restrictions are lifted for developments in Local Centres and Rural Settlements, but not in Villages and Hamlets which are most sensitive and have the lowest level of housing delivery. This position should be monitored over time in partnership with providers.

#### *7.15 Mortgage in possession clauses*

- 7.15.1 The affordability of Dartmoor's housing stock is not just limited to its purchase value. It is also important to ensure that eligible occupiers of affordable housing are able to access mortgages which enable them to benefit from a depressed market value.
- 7.15.2 Affordable properties which are restricted so that they can only be purchased or occupied by local people at a reduced market rate are less attractive to mortgage providers because a property's potential market is effectively limited. This means that providing a mortgage for these properties involves additional risk and complications which unfettered open market properties do not suffer from. If an occupier defaulted on their mortgage and the house was repossessed, there is a risk that the property could not be sold or would take additional time to sell. Due to this the number of mortgage providers who are willing to fund affordable properties is fewer than for open market properties. As there are fewer providers and less competition between them it is common for mortgage providers to charge higher interest rates on affordable properties than they would do funding a typical open market property. This trend can reduce the affordability of an affordable house and serve to cancel out the benefits of providing affordable housing in the first place. It is therefore important for the Local Planning Authority to ensure it does all it is able to improve the mortgageability of affordable housing. It can do this in two ways:
- Including a mortgagee in possession clause in the s106 agreement which allows mortgage providers to sell a property unfettered on the open market in the event a home is repossessed; and
  - including a cascade whereupon the local occupancy eligibility criteria area gradually

broaden their catchment over time if there is no interest in the property.

7.15.3 Cascades can effectively increase a property's market over time and helps to ensure they remain saleable in the event there is no local interest. Cascades are discussed in detail in Section 7.16.

7.15.4 Whilst cascades can help they still mean that in the event a mortgage provider repossesses a property it will take longer to market and sell. In the past this has been reflected in a mortgage's interest and has served to reduce the affordability of properties.

7.15.5 As a result the Authority has included mortgagee in possession clauses in its s106 agreements which allow affordable properties to be sold unfettered in the event of repossession. Although this approach has the potential to erode the affordable housing stock within the National Park it does effectively improve the affordability of properties for occupants, which is the principal purpose of providing affordable housing. It is also worth noting that the Authority are unaware of any cases where an affordable property has been lost via this route, it is therefore believed that the risk of significant loss is very low.

#### *Recommendations for policy*

7.15.6 In view of the above it is recommended the Authority continue including a mortgagee in possession clause within its s106 agreements.

### 7.16 *Cascades*

7.16.1 The National Park Authority uses Section 106 agreements to control the letting and sale of affordable dwellings within the National Park. S106 agreements are agreed by the National Park Authority and developer and signed prior to planning permission being granted. These ensure that residential development meets the requirements set out in affordable housing policies.

7.16.2 The legal agreement will contain occupancy restrictions which ensures homes are occupied by an 'eligible household' (as defined in Section 6.5 above). In some cases an eligible household cannot be found within a reasonable period of time. This may leave a property empty, which has financial implications for the owner, housing association, developer or mortgagee in possession. It may also affect the willingness of mortgage lenders to offer loans as they will require certainty that they can dispose of a repossessed property, within a reasonable period of time. For these reasons DNPA will include a 'cascade' whereby the search for residents of affordable housing is gradually widened from a starting point of those households with the strongest need and local connection.

### 7.17 *Cascade Advertising Timescales*

7.17.1 DNPA will negotiate appropriate timescales for advertising properties to strike an appropriate balance between identifying a local person in housing need to occupy a property, and minimising void periods.

7.17.2 Properties advertised through Devon Home Choice or Help to Buy South West are done so in accordance with partnership and nomination arrangements. These provide greater accountability and so the timescales for cascades may be less than the timescales for other providers. These are as follows:

- Homes must be advertised for rent or sale (in accordance with an agreed advertising scheme) for those with a local connection to the parish of provision and adjoining parishes
- If, after 8 weeks no qualifying person can be found, homes can be let to eligible

households with a local connection to Dartmoor National Park

7.17.3 The advertising requirements for privately provided intermediate homes for rent or sale are longer and are as follows:

- The owner must obtain a valuation of the property and advertise the property at or below the price calculated in accordance with the Section 106 agreement ;
- Properties must be advertised for rent or sale (in accordance with an agreed advertising scheme) for those with a local connection to the parish of provision and adjoining rural parishes;
- If, after 13 weeks no qualifying person can be found, homes can be offered to eligible households with a local connection to Dartmoor National Park;
- Section 106 agreements contain mortgagee in possession provisions which include specific arrangements should a property be re-possessed by the lender. In such cases, the lender will be required to advertise the property for sale to eligible households. If, after 13 weeks, no offer has been received, the lender is free to dispose of the property to any willing purchaser.

#### 7.18 *Local Authority Allocation Schemes*

7.18.1 The local housing authorities publish their own Allocation Scheme that sets out how they will allocate properties within the National Park. These will include reference to the eligibility and local connection criteria set out in the Local Plan.

#### 7.19 *Working with local communities and parishes on Local Lettings Plans*

7.19.1 DNPA is committed to working with parishes and local communities to deliver local needs housing and aims to respond positively to local circumstances. Local lettings plans and/or allocations policies may be prepared in collaboration with a community, to ensure that new homes safeguard the sustainability of the parish, or a cluster of parishes by reserving initial sales and lettings for the local community. Such plans should, however, remain consistent with the overarching principles set out in the Local Plan.

#### 7.20 *Minimising vacancy of affordable homes ('voids')*

7.20.1 We will seek to minimise the impact of empty properties in the following ways:

- Having shorter advertising periods where properties are let through Devon Home Choice or Help to Buy South West;
- Applying an appropriate cascade which ensures homes can be occupied within a reasonable period of time where no Eligible Household is found locally
- Ensuring new homes are advertised early;
- Working closely with Parish and Town Councils, Devon Home Choice and Local Housing Authorities to agree comprehensive marketing and advertising arrangements and promoting awareness by encouraging people to register with Devon Home Choice or Help to Buy South West; Monitoring letting requirements and responding to any new requirements.

#### 7.21 *How we will ensure the homes are occupied by eligible households*

7.21.1 The National Park prefers to use a proactive approach rather than enforcement action to ensure that homes are let or sold to eligible households. We would always encourage Local Housing Authorities, Registered Providers (normally Housing Associations) and individuals to seek our advice on whether an individual meets the qualification criteria for that property.

7.21.2 In rented properties the onus is on the Registered Provider to ensure new tenants at first and subsequent lettings comply with the relevant occupancy conditions set out in the S106

Agreement and Local Lettings Plan.

7.21.3 Currently DNPA has an Affordable Housing Eligible Household Information Form<sup>39</sup> which can be completed to establish whether someone satisfies the Affordable Housing Criteria set out in the s106. We have a service level agreement with Help to Buy South West to assess these requests on their behalf.

## 7.22 *The Right to Mutual Exchange*

7.22.1 Mutual exchange is the process whereby two or more tenants of social housing move house by swapping their homes. Tenants of public housing have a 'right' to mutual exchange which is given under the Housing Act 1985 and s158 of the Localism Act 2011 and applies to secure and assured tenancies (with the condition that at least one tenancy is not a secure flexible or an assured shorthold tenancy).

7.22.2 As the right to mutual exchange is a right born out of national legislation it is not possible for local restrictions to overrule it. As such there is scope for someone without a local connection to swap into an affordable property and effectively 'bypass' the s106 local eligibility requirements for the time the property is let to them. However, when the property becomes available again, it should be marketed in accordance with the s106 unless a further mutual exchange is pursued. The NPA are monitoring the impact of this legislation over time, where specific cases are raised. So far although there have been a handful of cases throughout the National Park its impact is understood to be limited. It is not felt that the right to mutual exchange poses a significant threat to the long-term availability of affordable housing in the National Park. However, were this route to become increasingly popular in the future, it could threaten availability.

## 7.23 *Vacant Building Credit*

7.23.1 The NPPF (2018) provides for a 'Vacant Building Credit' designed to promote the use of previously developed ('brownfield') land. It sets out that, where vacant buildings are being reused or redeveloped, any affordable housing contribution should be reduced by a proportionate amount. Given this is a new area of policy in respect of the Local Plan, it would be appropriate and assist the application of this policy if the Local Plan were to set out criteria which DNPA would apply to the Vacant Building Credit. This could include the following factors, which may be used to apply to the Credit:

- The provision applies to previously developed land only
- All floorspace will be calculated using gross internal floor area (GIFA)
- The whole building needs to be vacant, not just a single planning unit or part of the building and the provision does not apply to buildings which have been abandoned
- The applicant must demonstrate that the building has been vacant for a continuous period of 3 years preceding the day the planning application is valid
- Credit will not be applied to building(s) which have been made vacant for the purpose of redevelopment or where a building is covered by an extant or recently expired planning permission for the same or substantially the same development
- Where vacant building credit is applied, the full affordable housing obligations will be sought as a percentage of the remaining floor space viability

---

<sup>39</sup> [http://www.dartmoor.gov.uk/\\_data/assets/pdf\\_file/0008/972269/2014-05-30\\_Affordable\\_Housing\\_SPD\\_App2.pdf](http://www.dartmoor.gov.uk/_data/assets/pdf_file/0008/972269/2014-05-30_Affordable_Housing_SPD_App2.pdf)

- Where a vacant building credit calculation results in a part dwelling requirement this will be rounded up to the next whole affordable dwelling
- Vacant building credit provisions do not apply to rural exceptions sites

## 8 Ensuring sufficient housing delivery

### 8.1 Ensuring enough homes in the right place

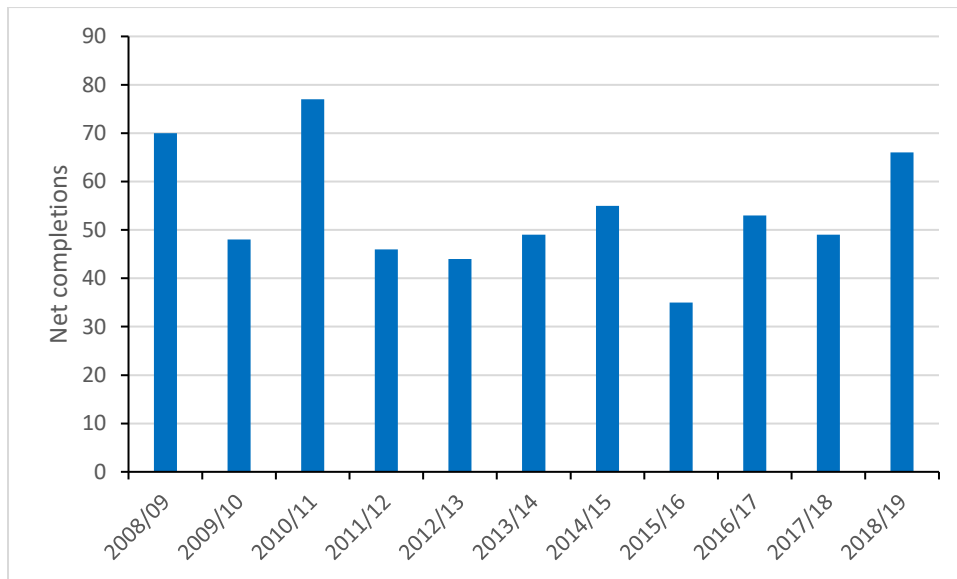
- 8.1.1 The recommendations in this topic paper propose changes to the Local Plan housing strategy which will change how much housing is delivered in the National Park and where. The emerging local plan seeks to increase housing delivery slightly to address a number of socio-economic issues the National Park is facing which are discussed in detail in section 3 of this topic paper. This section provides evidence which demonstrates the proposed strategy is deliverable and the proposed housing delivery figure will be met.
- 8.1.2 The proposed indicative housing delivery figure of 65 homes per year (see section for more information) will result in a total dwelling delivery of 1,125 homes over the plan period 2018 to 2036. This takes into consideration that prior to the emerging local plan being adopted the existing local plan, with a delivery rate of 50 per year, will continue to be used. It is expected that the emerging Local Plan will be adopted in 2021.
- 8.1.3 It is important to note that housing delivery in the National Park is very small-scale, particularly when analysed annually. Annual fluctuations in housing delivery will mean that the annual indicative housing delivery number is often significantly exceeded or not met, but will be met when considered as an average over the longer term. Given the small-scale nature of development it is also difficult to accurately predict the impact of policy shifts on housing delivery.
- 8.1.4 Throughout the lifetime of the current Core Strategy (April 2008 – March 2019), a total of 592 houses have been delivered in Dartmoor National Park (Table 9). This gives an average delivery rate of 54 net homes per year, which fits well with our guideline provision of 50 houses per year (Figure 6). This also means DNPA is not required to provide a buffer in the 5 year housing land supply for the new Local Plan.

**Table 9 - Net houses completed April 2008 - March 2019**

Year	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Total
<b>Net completions</b>	70	48	77	46	44	49	55	35	53	49	66	592

#### 8.1.5





8.1.6

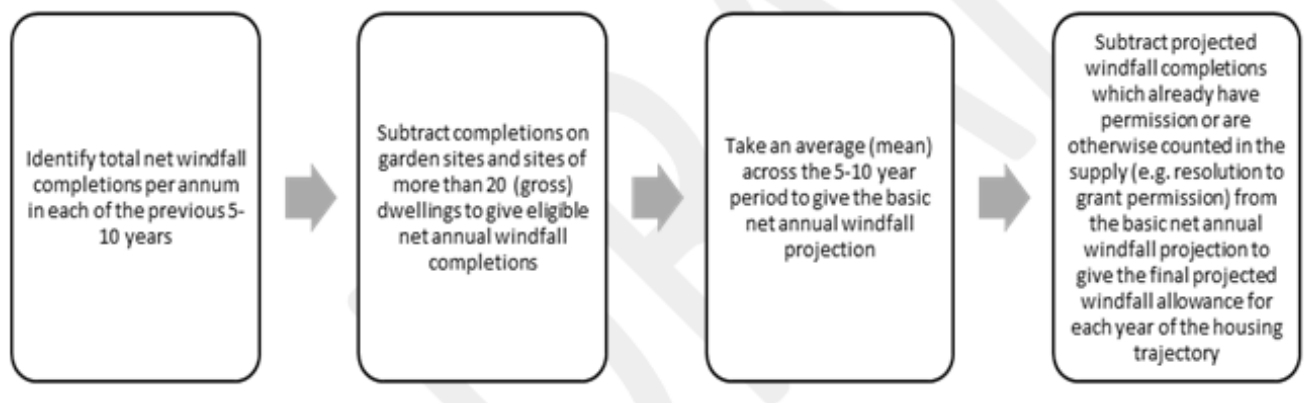
Figure 6 - Net houses completed April 2008 - March 2019

- 8.1.7 To forecast housing delivery Table 10 analyses recent windfall housing delivery together with the approximate yields from emerging allocated sites and the windfall completions from the plan period that has already passed (2018/19). This exercise therefore projects forwards the delivery rate of the current local plan policy framework and that which will come forward through the allocated development sites. Required delivery is apportioned to each settlement-tier as recommended in section 5.5.
- 8.1.8 The forecast allocated site yield is calculated from the total estimated site yields presented in Table 8 (504) and any units yet to be completed on allocated sites under construction. Only one allocated site from the existing Local Plan is currently under construction, Bretteville Close, Chagford which in September 2019 had 88 homes yet to be delivered of 93 homes granted permission. The total forecast allocated site yield in Dartmoor National Park is therefore 592.
- 8.1.9 Windfall supply has been calculated using the Housing and Economy Land Availability Assessment (HELAA) methodology for determining the housing potential of windfall sites. This methodology is provided below for reference:

*“The approach assesses net windfall completions per annum over the previous 5-10 years depending on availability of data (DNPA used 7 years), takes an average (mean) over that timeframe to identify a basic net annual windfall projection going forwards, then subtracts windfall supply already in the system.*

*Windfall completions and projections are required to exclude “garden sites” as directed by the NPPF. However, this approach also recommends excluding windfall completions on sites of 20 or more gross dwellings. This reflects the fact that overall historical windfall completions are likely to have been uplifted by larger sites permitted prior to current Local Plan periods and/or not being able to demonstrate five year land supply which are perhaps less likely to be realised going forwards. This sets out a conservative approach to windfall projections that accords with the NPPF requirement.”*

Process:



**Table 10 – Forecast housing delivery for the emerging Local Plan 2018 - 2036**

	A: Homes required under existing plan 2018 - 2020 (50 / year)	B: Homes required once emerging plan adopted 2021 - 2036 (65 / year)	C: Total homes needed (= A + B)	E: Forecast allocated site yield	F: Forecast windfall yield 2019-36	G: Windfall homes completed in 2018/19	H: Over/under supply of homes 2018 - 2036 (=C-(E+F+G))
Local Centres	-	585 (60%)	675 (60%)	533	325	53	+236
Rural Settlements	-	244 (25%)	282 (25%)	59	147	6	-182
Villages and Hamlets	-	97 (10%)	112 (10%)	0			
<b>Settlement Total</b>	-	<b>926 (95%)</b>	<b>1,069 (95%)</b>	<b>592</b>	<b>472</b>	<b>59</b>	<b>+54</b>
Open Countryside	-	49 (5%)	56 (5%)	0	125	8	+77
<b>Total</b>	<b>150</b>	<b>975 (100%)</b>	<b>1,125 (100%)</b>	<b>592</b>	<b>597</b>	<b>67</b>	<b>+131</b>

8.1.1 The exercise shows that current local plan policy together with the proposed allocated sites should be sufficient to meet the 65 homes per year indicative housing number with a buffer of 131 homes (12%). There is however a trend of under-delivery in the Rural Settlements and Villages and Hamlets, and over-delivery in the Local Centres and Open Countryside. This trend has been a key issue for the Local Plan to address and was identified at the Local Plan issues consultation in 2016.

8.1.2 The following is a brief summary of changes proposed to the housing strategy and how they seek to address the trends identified above. These will work to change the housing delivery forecast outlined in Table 10.

- A change from a two-tier settlement strategy to three-tier, the new middle-tier has a lower affordable housing requirement which will likely increase delivery in the Rural Settlements, but not the Villages and Hamlets.
- Sites are allocated for development in the Local Centres and Rural Settlements, the forecast yields are approximate (see Table 8) based on a standard methodology and actual yields may change after further site investigation
- A new local needs self- and custom-build policy allows single units to come forward without the need to provide affordable housing which may increase delivery of small infill sites across all settlements
- An option to deliver the affordable housing requirement on small sites as a financial contribution-in-lieu rather than on-site will provide a flexible approach that may increase delivery in Local Centres and Rural Settlements

## 8.2 Ensuring housing delivery throughout the plan period (the housing trajectory)

- 8.2.1 NPPF para 47 requires that local planning authorities should set out the expected rate of housing delivery through a housing trajectory for the plan period. This housing trajectory provides evidence about ac
- 8.2.2 Balancing housing supply throughout the plan period is important to ensure there is a continual stock of available sites that can be used to meet housing needs.
- 8.2.3 The Local Plan's strongest safeguard against oversupply at any point in the plan period is the requirement that larger developments are justified by demonstrating there is a need for affordable housing using an affordable housing needs assessment. This ensures that development in the National Park only occurs where it is meeting an identified affordable housing need and prevents the oversupply of homes which will not meet a local need.
- 8.2.4 Figure 8 shows the forecast housing trajectory, an approximate forecast of when housing delivery will come forward throughout the Local Plan period. This has first been calculated using the Housing and Economy Land Availability Assessment (HELAA) methodology for calculating housing delivery (see Figure 7). Then a range of site specific circumstances were considered and it decided if these would likely lead to a delay in delivery. These circumstances included whether:
- sufficient housing need exists currently or following development of another site, or if time will be needed to allow the need to establish;
  - the site is brownfield or greenfield, and there is a need for substantial demolition, refurbishment or survey;
  - a delay is needed to avoid multiple sites saturating the housing market in a settlement;
  - the site has a need for significant infrastructure prior to delivery;
  - there are significant natural environment, historic environment or other constraints to address; and
  - the site will be newly adopted.

Size of site (no. of dwellings)	Commencement of sites			Build out rate
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 <sup>st</sup> year - 25 dwellings maximum 2 <sup>nd</sup> year onward - 150 dwellings per year

**NB.** These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the HELAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

**Figure 7 - HELAA standard method for calculating housing delivery rates**

- 8.2.5 The housing trajectory is an approximation, based on assumption and is unlikely to be entirely accurate, but it provides a useful indication of how housing supply may come forward and can help identify potential unmanageable over-supply. Significant peaks and troughs in supply are identified, particularly in 2021 and 2022, to a large extent these are caused by the methodology.
- 8.2.6 Site briefs are being developed to help summarise and translate the Local Plan's policy requirements and expectations for allocated sites to developers, landowners and site promoters. These will be published alongside the Regulation 19 Local Plan consultation. Included as part of these site briefs will be a questionnaire and discussion with site stakeholders which will seek to establish and agree delivery rates on allocated sites. The trajectory will then be amended and refined in response to this evidence.

**Table 11 – Forecast Local Plan Housing Trajectory 2019 - 2036**

Site	Allocation or Windfall	Policy	Status as of September 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	Notes
Outdoor Experience, Chuley Rd, Ashburton	Allocation	ASH2 7.4	No permission. Application submitted (0332/19)				12	10														Delayed 1 year due to need for affordable housing
Tuckers, Chuley Rd, Ashburton	Allocation	ASH2 7.4	Permission granted, under construction (0035/18)	12	11																	
Longstone Cross, Ashburton	Allocation	ASH1 7.3	No permission. Application submitted (0312/19)			12	16					12										Site phased between land ownership parcels. 28 in parcel 1 to meet identified housing need. Phase 2 delayed to allow housing need to establish.
Kenwyn, Ashburton	Windfall	-	No permission. Application withdrawn (0120/18)						12	5												Delayed 3 years. Complicated brownfield site with significant demolition and/or refurbishment.
Axminster Carpets, Buckfast	Allocation	-	No permission. Application submitted (0300/19)						12	20	8											Delayed 3 years. Large complicated site, housing need issues, extensive demolition, archaeological and biodiversity constraints. Delivery balanced across three years.
Barn Park, Buckfastleigh	Allocation	BCK1 7.5	No permission. Application submitted (0615/18)			12	14															
Holne Rd, Buckfastleigh	Allocation	BCK2 7.6	No permission. Outline application submitted (0452/18)				12	16														Delayed 1 year. Complicated topography, infrastructure and biodiversity mitigation.
Glebelands, Buckfastleigh	Windfall	-	Permission granted (0253/18)	3																		
Bretteville Close, Chagford	Allocation	CHG2	Permission granted, under construction (0360/15)	25	25	25	13															
Lamb Park, Chagford	Allocation	CHG1 7.7	No permission.				12						12	12								Site phased on the basis of need. First phase 12 units of self/custom-build. Remainder delayed to

Site	Allocation or Windfall	Policy	Status as of September 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	Notes
																						allow housing need to establish.
Church Park, Cornwood	Windfall	-	No permission.			10																
New Park, Horrabridge	Allocation	HOR2 7.23	No permission.								12	23										Delayed 5 years. Flooding issues, mining investigation required, and housing need not established.
Down's Garage, Mary Tavy	Allocation	MTV2 7.23	No permission. Application withdrawn (0038/15)					12	7													Delayed 2 years. Site split by road, demolition and infrastructure requirements.
Forder Farm, Moretonhampstead	Allocation	MTN1	No permission. Outline approved (0228/18)							12	13											Delayed 4 years to avoid competition in limited market.
Thompson's Haulage Depot, Moretonhampstead	Allocation	MTN2 7.12	No permission. Application submitted (0139/19)			12	14															
Betton Way, Moretonhampstead	Allocation	7.10	No permission.													12	6					Delayed 10 years. Same land owner as Forder Farm, delayed to avoid competition in limited market.
Fairfield, South Brent	Allocation	SBR1 7.16	Permission granted subject to s106 (0346/18)		12	24																Delayed 1 year. Recent permission and unable to complete units within remaining year.
Palstone Lane (a), South Brent	Allocation	7.14	No permission. Application submitted (0147/19)			7	8															Custom-build with two contracts. Balanced delivery between two years
Palstone Lane (b), South Brent	Allocation	7.15	No permission										12	22								Delayed 7 years. New site, limited market and housing need not established.
Binkham Hill, Yelverton	Allocation	7.19	No permission								12	25	4									Delayed 5 years. New site. Vulnerable to Plymouth market and Woolwell site. Topographic and infrastructure constraints.
Elfordtown, Yelverton	Allocation	7.18	No permission													12	25	3				Delayed 10 years. New site. Vulnerable to Plymouth market and

Site	Allocation or Windfall	Policy	Status as of September 2019	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	Notes
																						Woolwell site. Housing need not established.
Adj Brookland Cottages, Widecombe-in-the-Moor	Windfall	-	No permission			6																
Local Centres HELAA Windfall	Windfall			0.4	11.4	19.4	19.4	19.4	7.4	14.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	19.4	Using LAA methodology to establish windfall and subtracting any windfall sites identified in the trajectory.
Rural Settlements and Villages and Hamlets HELAA Windfall	Windfall			0.86	4.86	0.86	0.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	8.86	
Open Countryside HELAA windfall	Windfall			6	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	
<b>Total</b>				<b>47.3</b>	<b>71.3</b>	<b>135</b>	<b>128</b>	<b>73.3</b>	<b>54.3</b>	<b>67.3</b>	<b>80.3</b>	<b>95.3</b>	<b>63.3</b>	<b>69.3</b>	<b>35.3</b>	<b>59.3</b>	<b>66.3</b>	<b>38.3</b>	<b>35.3</b>	<b>35.3</b>	<b>35.3</b>	

### Local Plan Housing Trajectory 2019 - 2036

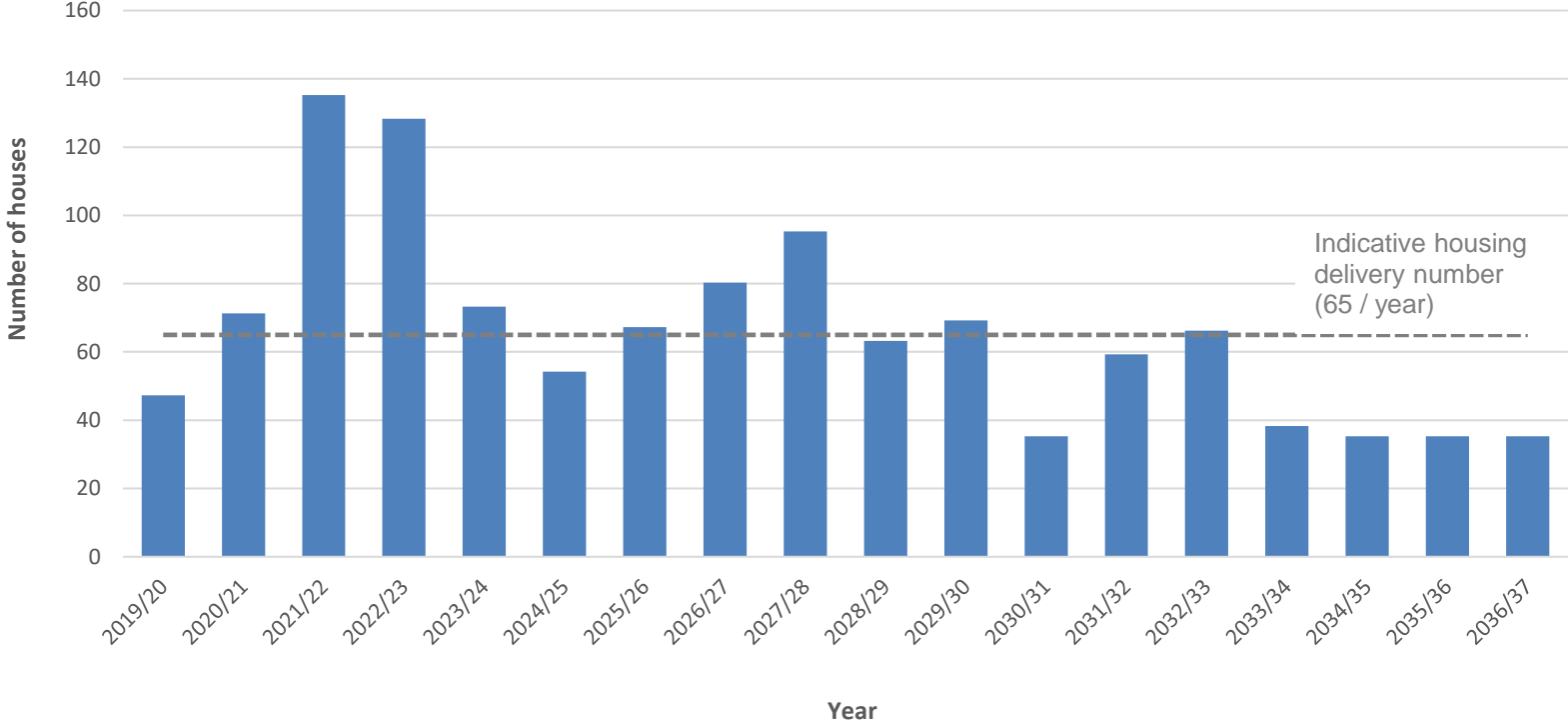


Figure 8 – Forecast Local Plan Housing Trajectory



## 9 Other measures to achieve housing objectives

### 9.1 Space standards

- 9.1.1 It is important to recognise that artificial discounts applied through policy/legal agreements are only one way in which housing may be ensured to be more affordable. The size of a property is a key factor in its value; smaller homes are more affordable. Government has set out Technical Housing Standards which help to ensure that the homes built in England are of a suitable size.
- 9.1.2 Historically, DNPA has applied a size restriction of 80m<sup>2</sup> to privately built affordable housing as described in section 6.8. This restriction ensures that the discount of 20-25% applied then achieves a home which is within reach of those in affordable housing need. This restriction has proven unpopular with some who may consider this too small for a family home.

#### *Recommendations for policy*

- 9.1.3 In response to the Technical Housing Standards and the application of this policy area to date, it is recommended that a size restriction be retained for affordability reasons, but that this may be increased. To ensure that affordability is not compromised by building large properties DNPA should seek a maximum space standard for affordable housing of 93m<sup>2</sup> Gross Internal Area. This area is equivalent to a 2 storey, 3 bedroom property for 4 people in the national Technical Housing Standards<sup>40</sup>.
- 9.1.4 Permitted Development Rights will be removed from intermediate rent, discounted market housing, Starter Homes and affordable custom and self-build dwellings to ensure the future size of properties can be controlled.
- 9.1.5 As part of the review of the local plan DNPA will explore further appropriate space standards for other housing types, such as rural workers' housing see Section 6.14. In addition, over time the government will review the national space standards and the National Park will respond to these changes in a way that is appropriate to meeting our Local Plan and Development Management Plan policies.

### 9.2 Reducing second home ownership

- 9.2.1 Second home ownership has recently become a controversial issue in some areas of the UK where it has led to increased house prices and served to compound the unaffordability of housing for local residents and workers.
- 9.2.2 When considering whether there is a need to manage the impact of second home ownership in the National Park the Authority needs to take into consideration:
- if there are second home ownership issues across the whole National Park or in certain locations; and
  - that any future policy can only control the occupation of future housing, it cannot control occupation of the existing housing stock, and therefore cannot solve second home ownership issues entirely.
- 9.2.3 There are two sources of second home ownership data: council tax records and the 2011 Census. Council Tax records are no longer a reliable source of second home ownership

---

<sup>40</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

data as there are no longer council tax discounts available for vacant homes. As a result many second homes are not reported to the Local Authority and cannot be traced. The 2011 Census therefore remains the most accurate measure of second home ownership across the National Park. Census Data shows the number of homes which are without a usual resident, the data therefore includes vacant homes, holiday lets and second homes, and it is not possible to differentiate between each type. It should also be acknowledged that the 2011 Census is dated, second home ownership may have increased in the last 7 years and could be partly responsible house prices increasing generally within the National Park, however it is not possible to demonstrate this is the case.

- 9.2.4 Overall the data shows that the National Park has 8.4% of household spaces without a usual resident, this increased significantly from 3% in the 2001 Census. Strategically this indicates that the level of second home ownership across the National Park is not at levels which significantly affect the housing market and ability of local people to access housing. The level of second home ownership is not as high as other areas where restrictive policies have been adopted to manage the impact, e.g. St Ives and Exmoor National Park.
- 9.2.5 Notwithstanding the strategic data, a more detailed study was conducted to assess levels of second home ownership spatially within the National Park, see Figure 9. Census data was broken down into output areas, the smallest possible geography to show Census Data. This allowed the Authority to assess whether second home ownership was more of an issue in some places, and whether there are any opportunities to respond to this in Local Plan policy.
- 9.2.6 Figure 9 shows that there are considerably high levels of vacant or second homes in certain locations within the National Park. High levels of dwellings without a usual resident are generally located in the open countryside, in low density upland areas with little settlement. The analysis gives an indication of second home ownership within settlements and suggests that it is considerably lower than the surrounding countryside. Although Moretonhampstead, Chagford and their hinterlands are likely to have higher levels of second home ownership, with areas where 12-15% of homes are without a usual resident.
- 9.2.7 The above trends also suggest that attractive properties for second home ownership are likely to be older traditional properties and not new build properties.

#### *Recommendations for policy*

- 9.2.8 There is limited evidence that second home ownership is a significant issue within settlements, where the local plan is focusing future growth and is able to influence occupancy. There is therefore insufficient evidence to justify pursuing a restrictive policy which limited occupation of new housing.
- 9.2.9 Notwithstanding this position it is clear that second home ownership has increased, may be an issue in some areas of the National Park and could present more of an issue in the future. High second home ownership has the potential to significantly undermine the local plan's spatial strategy by:
- artificially increasing house prices;
  - worsening affordability and the ability of local people and workers to remain living in their communities; and
  - worsening the availability of labour and skills and the integrity of communities throughout the National Park.
- 9.2.10 Given the considerable impact very high second home ownership could have on the Local Plan's ability to meet communities' needs, this policy position should be reviewed as and

when more up to date data is available, most likely at the next Census.

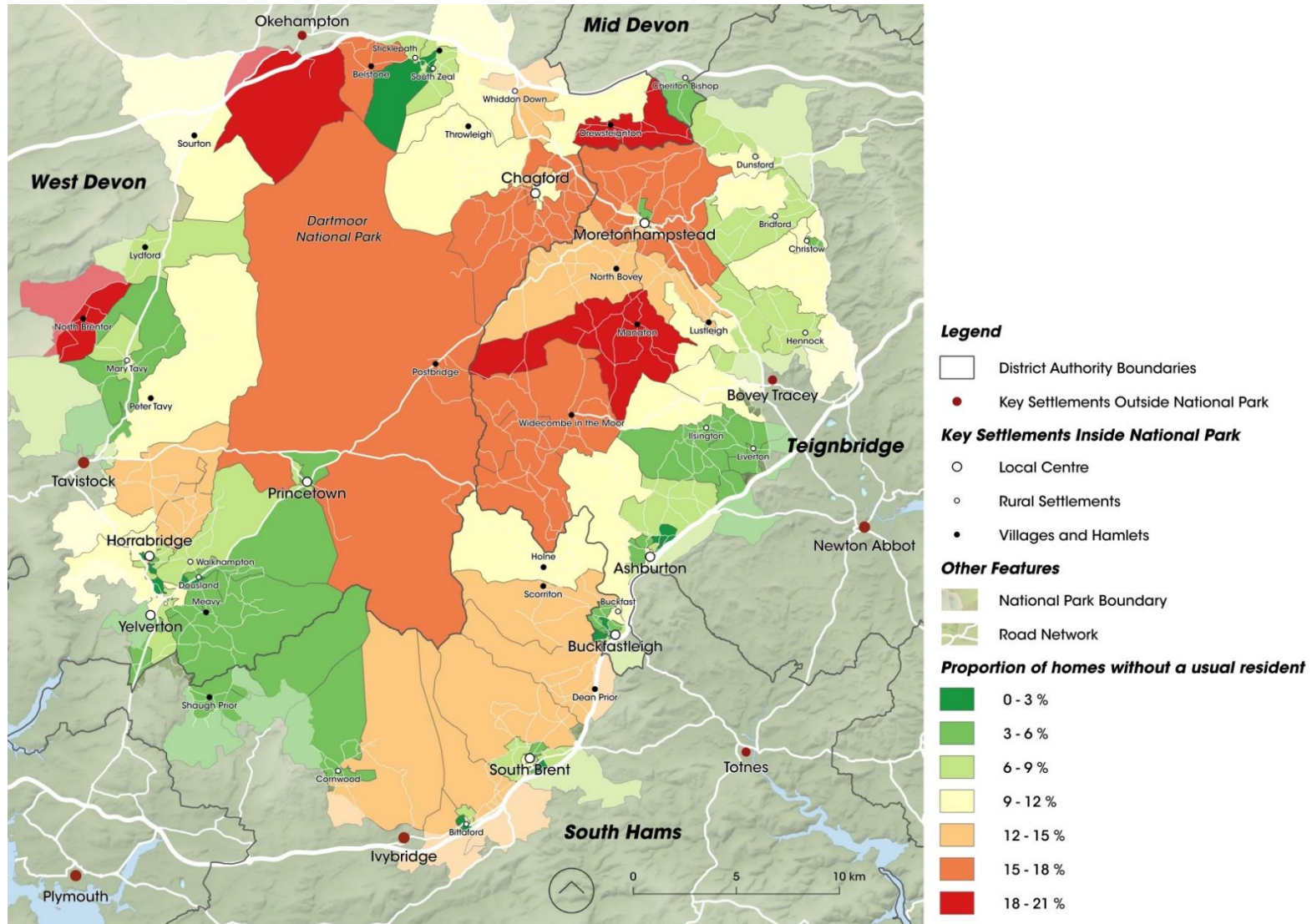


Figure 9 - Household Spaces without a usual resident shown across Output Areas (Census 2011)

### 9.3 *Householder Development - replacement dwellings, extensions and ancillary buildings*

- 9.3.1 Planning policies which control the size of replacement dwellings, residential extensions and ancillary buildings are one of the only ways the size and design of the National Park's existing housing stock of 15,537 dwellings can be influenced.
- 9.3.2 There are two principal reasons why the size of extensions and replacement dwellings are controlled by the planning system:
1. To maintain a mix of dwelling sizes and ensure a stock of more affordable dwellings are preserved for the benefit of future generations.
  2. To conserve the character and scale of existing dwellings and ensure they are not dominated by new development.
- 9.3.3 The impact of this unaffordability is that workers are increasingly pushed into affordable housing need, or eventually outside the National Park if that need cannot be met. The 2011 Census indicates 37% of people working in the National Park commute from outside. In turn this trend raises the average age of residents, which is already significantly older than the general population. This is predicted to significantly worsen, at the current rate of decline in 20 years the number of people of working age who are resident on Dartmoor will have decreased by 2,000 (10%). This decline in working population could come from those commuting-in, but this will entirely depend on the National Park's ability to retain and attract a working population.
- 9.3.4 A declining working age population will have a significant impact on the viability of many businesses, especially those relying on minimum wage employees who struggle to meet commuting and housing costs. There is already clear evidence in the hospitality and tourism sectors (accounting for just under 20% of Dartmoor's total employment) that poor worker availability is impacting on the ability of businesses to operate. All of the Dartmoor based accommodation and food service businesses who were interviewed for the Devon Renaissance 2014 business survey who had tried to recruit staff said that they received insufficient applicants for the number of posts they had available. The survey also highlighted that of those businesses surveyed in Dartmoor "71% of businesses found it hard to meet wage demands" in this industry. 50% of business in both South Hams and Dartmoor identified poor public transport links as a constraint or significant constraint to business growth.
- 9.3.5 Rising house prices have contributed to rising pressures for farmers to sell desirable countryside dwellings, many of which used to accommodate agricultural workers and be attached to land. The separate sale of farmhouses, divorced from the rest of the farm, has brought about the loss of much needed residential worker accommodation. It is likely that rising house prices are creating a continuing need for agricultural workers' dwellings, evident by the number of planning applications received.
- 9.3.6 Local Plan consultation exercises have also exposed that the lack of affordable accommodation is limiting downsizing opportunities for elderly residents. Strategically this could be contributing to the trend of larger family homes being under-occupied which in turn is contributing to a higher overall housing need.
- 9.3.7 The Local Plan is considering ways to support the hospitality and tourism businesses and improve access to labour, such as through supporting on-site worker accommodation and provision of affordable housing. However, to a large extent the fact that there is such an urgent need to do this is a very clear indication that the housing market and the planning system in the National Park have failed to maintain a stock of housing which is affordable to minimum wage workers. This is a situation many rural areas in England are facing, however

the age of Dartmoor's resident population means it is probably a decade in advance of the rest of the country in having to address it urgently.

9.3.8 The National Park's existing policies on residential extensions (DMD24) and replacement dwellings (DMD27) are purely design focused. The extensions policy contains a requirement that extensions represent a design approach that reflect the principles of the Design Guide and will not adversely affect the appearance of the dwelling. It also requires extensions not to increase a dwelling's total habitable floorspace by more than 30%. In applying Policy DMD24 there have been a number of issues:

- Despite affordability evidence, the policy's justification does not include the need to maintain a more affordable mix of dwelling sizes.
- The 30% rule is based on the dwelling at the time of application, not its original built form. This means there is no restriction on applying the 30% rule repeatedly, with the allowable floorspace increasing proportionately on each application.
- It does not take into consideration whether the size of the original dwelling meets national space standards, and can therefore inadvertently encourage sub-standard accommodation
- The policy does not mention permitted development rights which can be built in addition to that allowable under policy
- It is unclear whether gross external, gross internal or net internal floorspace is to be measured

9.3.9 The replacement dwellings in the countryside policy (DMD26) restricts replacement dwellings outside classified settlements only to those which will deliver enhancement of the local environment and significant energy efficiency improvements. It also restricts the overall volume increase to 15% which has proven difficult to justify when significant efficiency improvements, such as thicker insulation, are being made. There is no control over the size of replacement dwellings within classified settlements.

9.3.10 The ancillary accommodation policy (DMD25) relates to all types of ancillary habitable floorspace associated with a dwelling, including living accommodation and granny annexes. The policy includes no size or design restrictions, but does require the use to be tied to the main dwelling and not to be used as an independent dwelling.

9.3.11 Overall the three policies have proven difficult to apply together coherently and in doing so have often resulted in outcomes which are difficult to justify and appear unfair to applicants and decision makers.

#### *Recommendations for policy*

9.3.12 In reviewing the surrounding evidence there are two objectives for a new suite of householder policies that work together and respond to and counter the strategic socio-economic issues affecting the National Park:

- 1 maintain a stock of more affordable accommodation to attract workers; and
- 2 ensure there are sufficient opportunities which allow working people to stay in their communities.

9.3.13 Other National Park Authorities in southern England (including the New Forest and Exmoor), facing similar socio-economic circumstances and seeking to maintain dwelling sizes do so using a broadly consistent approach, by:

- Allowing extensions or replacement dwellings to increase a dwelling's floorspace (Gross Internal Area) by up to 30% against the size of the dwelling at a fixed point in

time, e.g. as it was originally built or as it was at a defined point in the past (e.g. 1974)

- Including any extensions or ancillary accommodation built using permitted development rights as part of the 30% allowance
- Ensuring any ancillary outbuildings with habitable accommodation are subject to the same 30% restriction, and that planning permission for non-habitable floorspace has a condition preventing it from being converted.
- Allowing exceptions to this rule only when:
  - The original accommodation does not meet minimum residential space standards
  - There is an identified need for ancillary accommodation which cannot be met in any other way, e.g. an elderly or disabled relative
  - There are clear design considerations relating to the special character of the building which means a small exception (no more than 5%) is necessary
- Removing permitted development rights for all development as a condition of approval

9.3.14 In changing the emphasis of policy the need to also control the design and appearance of householder development should nevertheless be maintained and it be clearly stated that compliance with any size limitations will not alone suffice to secure planning permission.

9.3.15 For clarity it is recommended the Authority adopt a clear definition of habitable floorspace which is based on the RICS definition of Gross Internal Floor Area<sup>41</sup>, but slightly amended to include only those parts of dwellings which are typically lived in. This would include:

- Areas occupied by internal walls and partitions, columns, piers chimney breasts, stairwells, lift-wells, other internal projections, vertical ducts, and the like
- Atria and entrance halls with clear height above, measured at base level only
- Voids over stairwells and lift shafts on upper floors
- Internal open sided balconies, walkways, and the like
- Structural, raked or stepped floors are treated as a level floor measured horizontally
- Horizontal floors with permanent access below structural, raked or stepped floors
- Corridors of a permanent essential nature
- Areas in the roof space and mezzanine areas converted for use with permanent access and a maximum ceiling height of at least 1.8m
- Mezzanine areas intended for use with permanent access
- Lift rooms, plant rooms, fuel stores, tank rooms which are housed in a covered structure of a permanent nature, whether or not above main roof level
- Service accommodation such as toilets, toilet lobbies, bathrooms, showers, changing rooms, cleaners' rooms and the like
- Conservatories

And excludes:

- Perimeter wall thickness and external projections
- External open-sided balconies, covered ways and fire escapes
- Areas in the roof space not intended for use
- Garages, workshops, greenhouses, garden stores, fuel stores and the like in residential property
- Loading bays
- Canopies, open ground floors and the like

9.3.16 Applying this approach across the National Park would likely decrease the amount of

---

<sup>41</sup> <http://www.rics.org/uk/knowledge/bcis/about-bcis/forms-and-documents/gross-internal-floor-area-gifa-and-ipms-for-offices/>

householder development and impact on the construction sector and associated design services. However, the overall size of dwellings will be better maintained and therefore remain more affordable than if they were allowed to continually extend. The approach could nevertheless lead to greater property churn as it would require people to move more often to meet their needs, potentially improving property availability and boosting the property services industry.

- 9.3.17 The downfall with the approach is that it is inflexible for meeting the needs of a growing family, also a common criticism of existing policy. As house prices and the cost of moving is high and local earnings are low the approach could restrict members of the working population with growing families who cannot afford to move. It is recommended that the policy is monitored with this in mind.
- 9.3.18 The 30% rule itself is a long established principle within planning policy which originates from the general amount a dwelling can be extended for it to be acceptable in design terms. Although often contested the 30% rule has proven a useful and simple guide for applicants to understand and decision makers to communicate, and it has been regularly robustly defended at appeal. The rule is somewhat unfair as it does allow larger extensions for larger houses, however, in the Authority's extensive experience in such matters it does generally result in acceptable design solutions. It is recommended that the 30% rule remains broadly fit for purpose.
- 9.3.19 In applying any policy restriction on householder development there are always going to be a loopholes which are difficult/impossible to guard against. History tells us that these are likely to be found and taken advantage of throughout the plan period and can serve to undermine the policy's intention and result in considerable frustration for applicants and decision makers. In the interests of transparency the Authority should be aware that the above approach will be susceptible to the following workarounds:
- The conversion of existing ancillary residential structures (such as garages) cannot be controlled as these works do not require planning permission where there isn't a material change to the external appearance of the building. Such conversions could result in an extension above the 30% allowable if they take place after permission is granted for an extension. Although this practice is unlikely to have a significant impact on affordability.
  - Similarly the conversion of loft space does not require planning permission and cannot be controlled, roof lights can be installed using permitted development rights. Where these works have not been undertaken at the point of application for an extension, but the loft space is capable of conversion, it would result in less floorspace being allowable under the 30% rule than if the conversion works had been completed. It may therefore be desirable to include this floorspace within a dwelling's existing floorspace where the loft space is capable of conversion and there is intent to undertake a conversion. This could be achieved through a slightly broader definition of habitable floorspace and ensuring permitted development rights required to complete the conversion were not removed.
  - The removal of permitted development rights is triggered by the commencement of development, it would therefore be possible to build an extension using permitted development rights at a point between planning permission being granted and the planning permission being started and result in an extension larger than the 30% allowable. It would be reasonable to explore how best to guard against this through careful conditioning.



**Appendix 1 – Affordable Housing Need estimations**

These tables have been prepared by Three Dragons and cross refer to the affordable housing calculations in Section 4.

**A Overall Need**

		Lowest level of need: those living in the DNPA for at least 3 years					maximum local need living and /or working in the DNPA for 3 years					Notes
		NPA EA1a 80 DPA	NPA EA1a 65 DPA	NPA EA2c 30 DPA	NPA 50 dwellings	NPA CLG2	NPA EA1a	NPA EA1a 65 DPA	NPA EA2c	NPA 50 dwellings	NPA CLG2	
	Overall Annual Affordable Housing Need											
A=C-D	Newly arising affordable housing need (annual)	-46	-16	-30	-23	35	6	3	-12	-5	53	new need only per year (net of known supply)
B(5)	Backlog affordable housing need per annum (met over 5 years)	45	45	45	45	45	81	81	81	81	81	Existing need per year met over 5 years
A=B(5)+C-D	Total affordable housing need (annualised) met over 5 years	-1	30	15	22	80	87	84	69	76	134	new need plus existing need for first 5 years
B (10)	Backlog affordable housing need per annum (met over 10 years)	23	23	23	23	23	41	41	41	41	41	Existing need per year met over 10 years
A=B(10)+C-D	Total affordable housing need (annualised) met over 10 years	-24	7	-8	0	58	46	43	28	35	93	new need plus existing need met over 10 years
B (20)	Backlog affordable housing need per annum (met over 20 years)	11	11	11	11	11	20	20	20	20	20	Existing need per year met over 20 years
A=B(20)+C-D	Total affordable housing need (annualised) met over 20 years	-35	-4	-19	-12	46	26	23	8	15	73	new need plus existing need met over 20 years
	<b>AH required as a % of all homes</b>	<b>-1%</b>	<b>46%</b>	<b>50%</b>	<b>44%</b>	<b>42%</b>	<b>108%</b>	<b>128%</b>	<b>229%</b>	<b>152%</b>	<b>70%</b>	<b>assuming you meet new need and existing need over 5 years (line</b>

### B Existing Need

Factor											Notes
B1 homeless households	2	2	2	2	2	2	2	2	2	2	All homeless (rows 1, 2, 3) in P1E – annual total 2015/16
B2 households in temporary/insecure accommodation	5	5	5	5	5	5	5	5	5	5	Devon Homechoice Bands A – D in temporary accommodation or hostel
B3 overcrowded households	135	135	135	135	135	184	184	184	184	184	Devon Homechoice Bands A - D lacking 1 or more bedrooms
B4 concealed households	0	0	0	0	0	0	0	0	0	0	All concealed families from 2011 census no allowance as likely to be double counted with C4
B5 unsuitable housing	232	232	232	232	232	374	374	374	374	374	Devon Homechoice bands A-D excluding downsizers, overcrowded and moves for work
B7 households in B2,3,5 already in affordable housing	148	148	148	148	148	160	160	160	160	160	Social housing tenants in bands A-D
B8 number of years to meet current need											varies under different scenarios
$B(5)=(B1+B2+B3+B4+B5-B6-B7)/5$	45	45	45	45	45	81	81	81	81	81	Meeting need over first 5 years
$B(10)=(B1+B2+B3+B4+B5-B6-B7)/10$	23	23	23	23	23	41	41	41	41	41	Meeting need over first 10 years
$B(20)=(B1+B2+B3+B4+B5-B6-B7)/20$	11	11	11	11	11	20	20	20	20	20	Meeting need over 20 years

### C Newly emerging need

Factor											Notes
C1 annual newly forming households	73	65	28	46	191	73	65	28	46	191	This is the average annual housing need in the demographic projection.
C2 proportion of new hh unable to afford	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	The proportion who cannot rent a lower quartile rent 2 bedroom property across the Greater Exeter area.
C3 existing hh falling into need each year	47	47	47	47	47	65	65	65	65	65	New applications in 2015-16, excluding existing social housing tenants.
C4 Concealed hh	0	34	34	34	34	34	34	34	34	34	Numbers in Bands A-D who are single and under 25, therefore probably newly forming households.
$C=C1*C2+C3-C4$	76	107	92	99	157	128	125	110	117	175	

### D Existing Supply

Factor											Notes
D1 vacant/surplus affordable stock	0	0	0	0	0	0	0	0	0	0	Below 3% therefore count as 0.
D2 already committed affordable housing	70	70	70	70	70	70	70	70	70	70	Planning permissions and resolutions to grant for affordable housing dwellings. Annual supply calculated by dividing over 20 years. MDDC 2016 comms, remainder 2017.
D3 annual supply of affordable relets	119	119	119	119	119	119	119	119	119	119	Average re-lets for last 5 years, excluding to existing social tenants
D4 annual supply of shared ownership sales	0	0	0	0	0	0	0	0	0	0	Average of 2010 - 2016 for s/o properties sold to shared owners
D5 annual right to buy and demolition of AH.	0	0	0	0	0	0	0	0	0	0	Council owned and RP including staircasing of shared ownership
$D=(D1+D2)/20+D3+D4-D5$	123	123	123	123	123	123	123	123	123	123	

<b>NOTES</b>								
<b>MODEL</b>	This model is based on the one developed for the GESP							
<b>row 2</b>	This includes a range based on defensible local need with 3 years at the same address (cols C-F) and maximum with households living and / or working in the NPA (G-J)							
<b>row 3</b>	The figures included here are annual dwelling requirements taken from the modelled scenarios. Potentially, this is an overestimate, given that some scenarios include a vacancy allowance							
<b>row 4</b>	If only newly arising annual need is considered, only in the CLG2 scenario is there a positive figure. This is mainly because a high proportion of re-lets go to non-transfer households							
<b>row 5-6</b>	It is a good practice (and reasonable assumption) to meet newly arising need and backlog need over a 5 year period. Some adjoining authorities have allowed longer.							
<b>rows 7-10</b>	These are scenarios for meeting backlog need over a longer period as in the GESP							
<b>rows 11</b>	The percentage of homes required to be affordable under each scenario assuming backlog need is met over 5 years							
<b>row 32</b>	Excluded from this calculation. It is not something typically seen in AH calculations							
<b>row 38</b>	Taken from live permissions. Worth noting that a high proportion of these are on 1 large site.							
<b>row 39</b>	One of the reasons net newly arising need is lower is that newly forming households receive a significant proportion of relets. Given that a high proportion of overcrowding in social housing, it could be that underproviding the right type of new housing exacerbates this.							
<b>rows 40/41</b>	Data unavailable (40 is from HTBSW). This will reduce annual need requirement if higher than zero. But see row 38							

## Appendix 2 –Overview of alternative models approaches

REF	MODEL	2015-35 dwelling growth	Annual dwelling growth	strengths	weaknesses
CLG1	CLG: housing as a share of national growth at 1.12% pa	4,220	211	In line with CLG standard methodology Would halt population decline	Unsuitable for a national park to share national growth rate May not be possible to accommodate without harm to environmental assets
CLG2	CLG: housing growth as a share of West Devon, Teignbridge and South Hams figures	3,818	191	In line with CLG standard methodology Would halt population decline	National park would be meeting the needs of a wider area, not local need May not be possible to accommodate without harm to environmental assets The Greater Exeter Strategic Plan is not seeking to meet its housing need in the NP
CLG3	CLG: housing growth as a share as a percentage of the CLG figure at HMA level	2,993	149	In line with proposed CLG approach Would halt population decline Would result in the lowest figure derived from CLG due to the dilution of the high South Hams figure with high affordability ratios	National park would be meeting the needs of a wider area, not local need May not be possible to accommodate without environmental harm The Greater Exeter Strategic Plan is not seeking to meet its housing need in the NP so this is unnecessarily high.
EA1a	Edge analytics SNPP 2014 at 73 dwellings pa with 10% market signals uplift	1,606	80	Makes the Edge forecast policy compliant with lowest level of market signal uplift Would halt population decline	Neither the Plymouth nor Exeter SHMAs use SNPP in their OAN calculations. Using Dartmoor's share of SNPP wouldn't be consistent. Using this forecast is not consistent with local population characteristics.

<b>EA1b</b>	<b>Edge analytics</b> SNPP 2014 at 73 dwellings pa with 20% market signals uplift	1,752	88	Makes the Edge forecast policy compliant with level of market signal uplift consistent with rest of Plymouth HMA area.  Would halt population decline	Neither the Plymouth nor Exeter SHMAs use SNPP in their OAN calculations. Using Dartmoor's share of SNPP wouldn't be consistent. Using this forecast is not consistent with local population characteristics.
<b>EA1c</b>	<b>Edge analytics</b> SNPP 2014 at 73 dwellings pa with 30% market signals uplift	1,898	95	Makes the Edge forecast policy compliant with a market signals uplift  Would halt population decline	Neither the Plymouth nor Exeter SHMAs use SNPP in their OAN calculations. Using Dartmoor's share of SNPP wouldn't be consistent. Using this forecast is not consistent with local population characteristics.
<b>EA2a</b>	<b>Edge analytics</b> long term migration trend at 23 dwellings pa at 10% market signals  (13 years)	506	25	Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.  Makes the Edge scenario policy compliant with a market signals uplift	Results in continuing declining and ageing population based on current trends but this could/should be addressed through converting the OAN into a policy-on Local Plan figure.  At levels this low, difficult to address specific types of need or uplift for market signals.
<b>EA2b</b>	<b>Edge analytics</b> long term migration trend at 23 dwellings pa at 20% market signals  (13 years)	552	28	Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.  Makes the Edge scenario policy compliant with a market signals uplift	Results in continuing declining and ageing population based on current trends but this could be addressed through converting the OAN into a policy-on Local Plan figure .  At levels this low, difficult to address specific types of need or uplift for market signals
<b>EA2c</b>	<b>Edge analytics</b> long term migration trend at 23 dwellings pa at 30% market signals  (13 years)	598	30	Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.  Makes the Edge scenario policy compliant with a market signals uplift	Results in continuing declining and ageing population based on current trends but this could be addressed through converting the OAN into a policy-on Local Plan figure.  At levels this low, difficult to address specific types of need or uplift for market signals.
<b>EA3a</b>	<b>Edge analytics</b> 10 year migration trend at 22 dwellings pa at 10% market signals	484	24	Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.  Makes the Edge scenario policy compliant with a market signals uplift	Results in continuing declining and ageing population based on current trends but this could/should be addressed through converting the OAN into a policy-on Local Plan figure.  At levels this low, difficult to address specific types of need or uplift for market signals.

				Is consistent with HMAs' OAN calculations	
<b>EA3b</b>	<b>Edge analytics</b> 10 year migration trend at 22 dwellings pa at 20% market signals	528	26	<p>Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.</p> <p>Makes the Edge scenario policy compliant with a market signals uplift</p> <p>Is consistent with HMAs' OAN calculations</p>	<p>Results in continuing declining and ageing population based on current trends but this could/should be addressed through converting the OAN into a policy-on Local Plan figure.</p> <p>At levels this low, difficult to address specific types of need or uplift for market signals.</p>
<b>EA3c</b>	<b>Edge analytics</b> 10 year migration trend at 22 dwellings pa at 30% market signals	572	29	<p>Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.</p> <p>Makes the Edge scenario policy compliant with a market signals uplift</p> <p>Is consistent with HMAs' OAN calculations</p>	<p>Results in continuing declining and ageing population based on current trends but this could/should be addressed through converting the OAN into a policy-on Local Plan figure.</p> <p>At levels this low, difficult to address specific types of need or uplift for market signals</p>
<b>EA4a</b>	<b>Edge analytics</b> short term migration trend at -1 dwelling pa at 10% market signals (6 years)	0	0	<p>Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.</p> <p>Makes the Edge scenario policy compliant with a market signals uplift</p>	<p>Results in continuing declining and ageing population based on current trends - results in a negative forecast of minus 1 dwelling uplifted with market signals. But this could/should be addressed through converting the OAN into a policy-on Local Plan figure.</p> <p>At levels this low, difficult to address specific types of need or uplift for market signals.</p>
<b>EA4b</b>	<b>Edge analytics</b> short term migration trend at -1 dwelling pa at 20% market signals (6 years)	0	0	<p>Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.</p> <p>Makes the Edge scenario policy compliant with a market signals uplift</p>	<p>Results in continuing declining and ageing population based on current trends - results in a negative forecast of minus 1 dwelling uplifted with market signals. But this could/should be addressed through converting the OAN into a policy-on Local Plan figure.</p> <p>At levels this low, difficult to address specific types of need or uplift for market signals.</p>
<b>EA4c</b>	<b>Edge analytics</b> short term migration trend at -1 dwelling pa at 30% market signals	0	0	<p>Uses localised migration flows and treats the needs of the NPA as distinct from the wider area.</p>	<p>Results in continuing declining and ageing population based on current trends - results in a negative forecast of minus 1 dwelling uplifted with market signals. But</p>

	(6 years)			Makes the Edge scenario policy compliant with a market signals uplift	<p>this could/should be addressed through converting the OAN into a policy-on Local Plan figure.</p> <p>At levels this low, difficult to address specific types of need or uplift for market signals.</p> <p>Won't comply with Plymouth joint local plan distribution strategy to accommodate 600 dwellings</p>
<b>HMA1</b>	<p><b>Plymouth and South Hams SHMA</b></p> <p>Dwelling growth as a share of the Plymouth and SW Devon HMA overall</p>	1,351	66	<p>Is consistent with the Plymouth SHMA</p> <p>Meets the Plymouth JLP distribution strategy</p> <p>Will marginally halt population decline</p>	<p>The NPA would be accommodating a greater proportion of growth from across SW Devon</p> <p>Level of growth is not consistent with local population characteristics.</p> <p>Would continue to result in aging population</p> <p>Doesn't reflect Greater Exeter SHMA</p>
<b>HMA2</b>	<p><b>Plymouth and South Hams SHMA</b></p> <p>Dwelling growth as a share of the Plymouth and SW Devon need for West Devon and South Hams</p>	1,994	100	<p>Is consistent with the Plymouth SHMA</p> <p>Meets the Plymouth JLP distribution strategy</p> <p>Will halt population decline and re-balance population with in-migration</p>	<p>Limiting the share to West Devon and South Hams would mean accommodating a greater proportion of growth.</p> <p>Level of growth is not consistent with local population characteristics.</p> <p>Doesn't reflect Greater Exeter SHMA</p> <p>May not be possible to accommodate without environmental harm</p>
<b>HMA3</b>	<p><b>Plymouth and South Hams SHMA</b></p> <p>Dwelling growth as a share of the Plymouth and SW Devon HMA overall extrapolated for the rest of the Dartmoor NPA</p>	2,364	118	<p>Is consistent with the Plymouth SHMA</p> <p>Meets the Plymouth JLP distribution strategy</p> <p>Will halt population decline and re-balance population with in-migration</p>	<p>Would mean accommodating a greater proportion of growth from a wider area.</p> <p>Level of growth is not consistent with local population characteristics.</p> <p>Doesn't reflect Greater Exeter OAN proposal not to meet housing need within the NPA.</p> <p>May not be possible to accommodate without harm to environmental assets</p>

<b>HMA4</b>	<b>Plymouth and South Hams SHMA</b>  Dwelling growth as a share of the Plymouth and SW Devon HMA need for West Devon and South Hams extrapolated for the rest of the Dartmoor NPA	3,490	174	Is consistent with the Plymouth SHMA  Meets the Plymouth JLP distribution strategy  Will halt population decline and re-balance population with in-migration	Would mean accommodating a greater proportion of growth from a wider area.  Level of growth is not consistent with local population characteristics.  Doesn't reflect Greater Exeter OAN proposal not to meet housing need within the NPA.  May not be possible to accommodate without environmental harm
Dwelling led scenarios not reviewed by ORS 2015-2035 - deemed Policy-On					
<b>POn1</b>	<b>Edge analytics</b> dwelling led approach at 80 dwellings pa	Exeter	Plymouth	Meets the Plymouth JLP distribution strategy and any windfall allowance from Exeter HMA  Will halt population decline and re-balance population with in-migration	Not compliant with the OAN methodology as it takes supply into account  Doesn't reflect Greater Exeter OAN proposal not to meet housing need within the NPA.  May be difficult to deliver based upon historic levels
		35pa 700	45pa 900		
<b>POn2</b>	<b>Edge analytics</b> dwelling led approach at 50 dwellings pa	Exeter	Plymouth	Broadly meets the Plymouth JLP distribution strategy and Exeter HMA  Will prevent population decline, maintained at current levels  Deliverable and consistent with current housing target	Not compliant with the OAN methodology as it takes supply into account  Doesn't reflect Greater Exeter OAN proposal not to meet housing need within the NPA.  Would not address any need to rebalance an aging population.
		22pa 440	28pa 560		
<b>POn3</b>	<b>Edge analytics</b> dwelling led approach at 30 dwellings pa	Exeter	Plymouth	Would meet any windfall allowance from Exeter HMA	Doesn't meet JLP distribution strategy  Not compliant with the OAN methodology



				Provides a level of growth consistent with local population characteristics.	Doesn't reflect Greater Exeter OAN proposal not to meet housing need within the NPA.  Would result in population decline and an aging population
--	--	--	--	--	--

### Appendix 3 - Summary of recent affordable housing need models/approaches in Dartmoor National Park

This table summarises the comparative models/approaches taken through constituent SHMNA data, alongside the modelled DNPA estimates by Three Dragons

Existing / backlog need	DNPA (South Hams and West Devon) 2013 PARK	EXETER SHMA Teignbridge and Mid Devon DCA 2014-15 PARK	(South Hams) HDH 2017	West Devon) HDH 2017	(Teignbridge) DCC 2017	Combined affordable housing needs assessment
Homeless households	1	0			67	1
Over-crowded and concealed households					1971	
Housing register A-D	185	171				396
Transfers	36	61			645	156
<b>TOTAL NEED</b>	<b>150</b>	<b>110</b>	<b>687</b>	<b>295</b>	<b>1,393</b>	<b>241</b>
Surplus stock (long term vacant)	0	0	n/a	n/a	0	0
Committed AH supply	7	40	n/a	n/a	Calculated as part of total supply, later in the model	70
Units to be taken out of management	4	0	n/a	n/a		0
<b>TOTAL STOCK AVAILABLE</b>	<b>3</b>	<b>101</b>	<b>451</b>	<b>271</b>		<b>70</b>
Shortfall to meet current need (annual) (5 years,10 years,20 years)	29 (147)	14 (70)	13* (236)	1* (24)	69* (278,139)	34 (171,13,8)

\* 2017 calculations assume backlog need is met over 20 years

1. all band E applicants have been excluded from the calculations
2. The level of transfers in the calculation has increased. This appears to be caused by a backlog of need for larger houses suggesting longer term overcrowding. Transfers are deducted from the need figures because they both create need and a vacancy as households move.
3. There is a higher number of recent planning permissions for affordable housing creating a higher level of commitments. Important to note that 40% of these commitments are on a single large development site with delivery over a number of years.
4. The DNPA calculation is estimated to meet the backlog over a 5 year period. Thus is in contract to the current SHMA proposals for Plymouth and Exeter.