



Dartmoor Local Plan (2018 - 2036) Examination

ED24 DNPA Hearing Statement 9 Site Allocations

(PART 2 – Issue 2)

Whether the proposed housing, employment and mixed-use site allocations are justified, effective and consistent with national policy.

The answers to the Inspector's questions regarding allocations are organised below by settlement and allocation policy. In each section, the 6 summary questions (Site allocations (all)) questions 1 to 6 are answered first followed by site specific queries. It is hoped this approach aids consideration of these questions on a site by site basis.

The *Issue 2 Site allocations (all)* questions are not repeated in full in each section, but the following question heading are used:

All Q1 Justified policy? Viable/ deliverable? Justified policy? Viable/ deliverable?	Q1. Are they appropriate and justified in light of potential constraints, infrastructure requirements and adverse impacts? Are the sites viable and deliverable?
All Q2 Timescale? Realistic?	Q2. What is the expected timescale for development? Is it realistic?
All Q3 AH Justification/Viability/A H obligations policy compliant? AH Justification/Viability/A H obligations policy compliant?	Q3. What is the justification for the affordable housing requirements? How has viability been taken into account? Would this accord with national policy set out in NPPF paragraph 56 in relation to planning obligations?

All Q4 Justification for Policy Requirements?	Q4. What is the justification for specific policy requirements in relation to matters such as flood risk assessments and mitigation, appropriate assessment under the Habitats Regulations or other assessments? What is the justification for other policy requirements?
All Q5 Allocation wording clear and effective?	Q5. Would the detailed wording of each allocation be clear and effective?
All Q6 Overall soundness	Q6. Overall, are the allocations justified, effective and consistent with national policy?

A general response to Question 1 is also provided in respect of viability, to provide context for any detailed comments on viability whilst avoiding duplication for each site.

Question 1. What is the justification for the affordable housing requirements? How has viability been taken into account? Would this accord with national policy set out in NPPF paragraph 56 in relation to planning obligations?

1.1 PPG (003 Reference ID: 10-003-20180724) sets out that

“Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies”.

1.2 The Whole Plan Viability Assessment and Addendum [SD91 and SD90] examined a set of residential typologies, following the process outlined at PPG paragraph 4. *“The characteristics used to group sites ... reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan”* and *“Average costs and values ... (were) used to make assumptions about how the viability of each type of site would be affected by all relevant policies”* 004 Reference ID: 10-004-20190509. The assumptions were consulted upon with developer stakeholders (see SD91 Annex II and paragraphs 2.19 and 2.9).

1.3 The typologies tested were of 25, 40 and 80 dwellings (in each value area) and cover the breadth of sites allocated in the Plan and are of

similar size. (The selection of case studies is discussed at 2.17 and 2.18 in SD91.)

- 1.4 It is worth noting here that additional land costs such as “*abnormal costs; site-specific infrastructure costs; and professional site fees*” should be reflected in the land value. And that

“under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan”.

014 Reference ID: 10-014-20190509

Ashburton

Proposal 7.3 (2) Land at Longstone Cross, Ashburton

All Q1 Justified policy? Viable/ deliverable?

1. There is an evidenced need for housing in Ashburton, particularly affordable housing. There is insufficient brownfield land available, and of potential greenfield sites this one had fewest constraints or potential for adverse impacts. A development of 39 dwellings has been approved (ref 0312/19), and the applicant has robust business case and delivery plan illustrating viability. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD175).

All Q2 Timescale? Realistic?

2. Delivery is planned for years 1 – 5.
After servicing no delays in build out expected as the applicant is an Affordable Housing Provider and is not market driven.

All Q3 AH Justification/Viability/AH obligations policy compliant?

3. The Housing Topic paper [SD106] and the housing market needs assessment and demographic reports clarify that the overriding need in the national park is for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. Discussions with site owners ensured that owner expectations of land values would need to be in consideration of affordable housing-led development. The plan viability [SD90 and SD91] assessment confirmed adequate residual value at high levels of affordable housing (45%), and site assessments concluded that schemes would be financially deliverable.
4. Given the statutory purpose of conserving the special qualities of the national park, residential development is permitted to sustain the needs of the local residents which in this case is for affordable homes. The target of 100% affordable homes is a response to the developers offer based on the availability of funding and the site being partly in public ownership; the requirement is for on-site delivery and is directly related to the development and is reasonable in scale.

All Q4 Justification for Policy Requirements?

5. Policy requirements in relation to evidence to Habitats evidence is a specific requirement of the Habitat Regs Assessment [SD78] because the site is within the GHB connectivity zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

6. The policy is a straightforward allocation and no substantive issues were raised in consultation.

All Q6 Overall soundness

7. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.4(2) Chuley Road, Ashburton

All Q1 Justified policy? Viable/ deliverable?

8. As a brownfield regeneration site, which presents opportunities to deliver multiple social, economic and environmental benefits, this allocation is justified. This site allocation sets out principles and requirements to guide development submitted within the allocation area. This area has been subject to masterplanning work between 2013 and 2015 (<https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/site-specific-plans-and-masterplans/ashburton-masterplan>) which explored constraints and issues albeit not progressing to adoption. The complexity of ownerships within the area prevent comprehensive redevelopment however incremental development is clearly viable and deliverable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD176).

All Q2 Timescale? Realistic?

9. Some delivery is anticipated in years 1 to 5, and later delivery in years 6 to 10 and 11 to 15. There is an application in consideration on the "Outdoor Experience" site (ref 0332/19). A separate 23 dwelling scheme in the allocation area is nearing completion (0035/18).

All Q3 AH Justification/Viability/AH obligations policy compliant?

No specific AH requirements are included in this allocation. The policy simply notes a need to respond to affordable housing need (7.4(a)). Strategic Policy 3.1 will also be a relevant policy in considering individual applications' affordable housing. Potential abnormal costs No specific AH requirements are included in this allocation. The policy simply notes a need to respond to affordable housing need (7.4(a)). Strategic Policy 3.1 will also be a relevant policy in considering individual applications' affordable housing. Potential abnormal costs (notwithstanding that these should be considered within land value as per PPG para 014 Reference ID: 10-014-20190509) and possible vacant building credit for developments within this area means that reduced AH delivery will be balanced against larger regeneration objectives.

All Q4 Justification for Policy Requirements?

10. Given the complexity of the site there is a need for any proposals to consider how development fits in to the social, economic, environmental fabric of the town and the wider site. Policies related to traffic, parking

and movement seek to ensure safe, effective, and integrated movement for cars and people and to prevent development impacting the wider area.

11. Flood Risk policies are required to ensure on site and downstream flood impacts are considered (see below).
12. Policy requirements in relation to evidence to habitats evidence is a specific requirement of the Habitat Regs Assessment [SD78] because the site is within the GHB sustenance zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

13. This is a straightforward site allocation policy which is considered appropriate in this case.

All Q6 Overall soundness

14. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.4(2) Chuley Road, Ashburton site specific questions

Q1. This allocation provides no indicative capacity due to site constraints. However, the housing topic paper provides an indicative capacity of 45 dwellings for the purposes of housing land supply. Is the approach taken justified?

15. Proposals here may be employment or residential led and it is not possible to apportion m2 of various uses within the larger area. In light of known opportunities for conversion and redevelopment, based on previous detailed masterplanning and consideration of current and previous applications submitted within the site, it is reasonable to assume a level of delivery of around 45 dwellings over the plan period.
16. The topic paper table could have better described this as a Windfall rather than allocation, but it is not considered that this makes the allocation or planned housing delivery unsound.

Q2. In requiring individual applications to manage flood risk, would the proposal be effective? Why would a strategic approach to managing flood risk for the whole site allocation not be achievable?

17. The Strategic Flood Risk Assessment and Addendum [SD120 and SD121] provide the details of how sequential and exception testing support the allocation of the site for mixed use regeneration. As noted in the Environment Agency comments (respondent 0058) strategic approaches to managing flood risk will by nature need to focus on upstream

opportunities which are outside the allocation area. As written, the allocation enables consideration of the details of each proposal (e.g., floor levels, improvements to existing drainage/attenuation for that building/parcel) as well as seeking contributions to upstream management.

Q3. In light of identified access, flood risk and land ownership constraints would the site be delivered within the Plan period?

18. Within the site there are a number of opportunities to deliver housing and commercial/employment space for individual developments where access etc. will not impede delivery. For example the site of the current application at "outdoor experience" (ref 0332/19) is substantially in flood zone 1. There are opportunities to achieve adequate permeability and access through and within the site despite disjointed ownership.

Buckfastleigh

Proposal 7.5(2) Land at Barn Park, Buckfastleigh

All Q1 Justified policy? Viable/ deliverable?

19. Buckfastleigh is an area of housing need and as the settlement profile [SD193] sets out there is a need for a mix of affordable and market housing. There are no brownfield sites available (a previous brownfield opportunity is now retained by the owner for employment use) and this greenfield site adjacent to existing housing was identified as being deliverable with fewest constraints and negative impacts. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD177).

All Q2 Timescale? Realistic?

20. Residential delivery is expected in years 1 to 5. An application for 28 dwellings (0615/18) is under consideration. The landowner is willing and there are no long lead time constraints to development.

All Q3 AH Justification/Viability/AH obligations policy compliant?

21. The Housing Topic paper [SD106] and the housing market needs assessment and demographic reports clarify that the overriding need in the area is for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The viability assessments [SD90 and SD91] confirmed adequate residual value at high levels of affordable housing (45%), and site assessments concluded that schemes would be financially deliverable.
22. Given the statutory role of conserving the special qualities of the national park, residential development is permitted to sustain the needs of the local residents which in this case is for affordable homes. The target of 45% affordable homes is necessary to justify residential development in this protected environment, the requirement is for on-site delivery and is directly related to the development and is reasonable in scale.

All Q4 Justification for Policy Requirements?

23. Policy requirements in relation to evidence in relation to evidence to Habitats evidence is a specific requirement of the Habitat Regs Assessment [SD78] because the site is within the GHB sustenance zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

24. Straightforward allocation is appropriate for this site.

All Q6 Overall soundness

25. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.6 (2) Land at Holne Road, Buckfastleigh

All Q1 Justified policy? Viable/ deliverable?

26. Buckfastleigh is an area of housing need and as the settlement profile [SD193] sets out there is a need for a mix of affordable and market housing. This greenfield site is environmentally sensitive and there will be design requirements relating to bats, but there are no overriding technical costs limiting viability. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD178).

All Q2 Timescale? Realistic?

27. The housing topic paper [SD106] trajectory identified this site as achievable in years 1 to 5. (see comment below re achievability)

All Q3 AH Justification/Viability/AH obligations policy compliant?

28. The Housing Topic paper [SD106] and the housing market needs assessment and demographic reports clarify that the overriding need in the national park is for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The plan viability [SD90 and SD91] assessment confirms some residual value at high levels of affordable housing, and site assessments concluded that schemes would be financially deliverable.
29. Given the statutory role of conserving the special qualities of the national park, residential development is permitted to sustain the needs of the local residents which in this case is for affordable homes. An element of affordable housing is allowed to cross-subsidise the affordable housing and to meet market demand. The target of 45% affordable homes is necessary to justify residential development in this protected environment, the requirement is for on-site delivery and is directly related to the development and is reasonable in scale.

All Q4 Justification for Policy Requirements?

30. Policy requirements in relation to evidence to inform Habitats Regulations Appropriate assessments are reasonable for assessing site impacts, and the site is within the sustenance zone associated with the South Hams SAC. Requirement 1 (AH) is justified (as above). Requirement 2 ensures that access arrangements are designed and delivered in a way that supports future delivery of adjacent allocation.

All Q5 Allocation wording clear and effective?

31. This is a straightforward allocation with appropriate and necessary criteria and requirements.

All Q6 Overall soundness

32. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.6(2) Holne Road, Buckfastleigh Site Specific Question

Q1. In light of policy requirements in relation to affordable housing and impacts on the South Hams SAC, is there robust evidence that this site would be developed within the Plan period?

33. Consideration of recently refused application (0452/18) was a result of an absence of reasonable on-site affordable housing. It is unclear to what extent this relates to the applicant's business model or landowner expectations failing to recognise the overriding public interest that development in the National Park must deliver.
34. No clarifications have been provided from the owner or agents to confirm willingness to meet or achieve the requirements set out. In light of this, and the specific environmental sensitivities of this site (within the sustenance zone of a maternity roost of the South Hams SAC), the Authority is concerned that the site may be unable to deliver in a way that meets the Local Plan strategy and wider sustainable development requirements. On this basis it may be reasonable to consider alternatives through modifications, to ensure a deliverable site is identified to meet local housing need.

ChagfordProposal 7.7 (2) Land at Lamb Park, Chagford**All Q1 Justified policy? Viable/ deliverable?**

35. The Chagford Settlement Profile (SD194) confirms that there will be growth in housing need for the town. The greenfield site is adjacent to existing housing with no constraints or negative impacts. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD179).

All Q2 Timescale? Realistic?

36. Residential development expected in Years 1 to 5 and years 6-10. The delayed delivery reflects the view that Community/Collective selfbuild schemes can take more time to commence. However, advice from the landowner and experience elsewhere confirm that the site is deliverable.

All Q3 AH Justification/Viability/AH obligations policy compliant?

37. Submission documents clarify that the overriding need in the national park is for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The viability [SD90 and SD91] assessments considered custom and self-build in relation to infill opportunities, but experience with a number of Dartmoor and Devon communities confirms that this is readily achievable on greenfield sites.
38. An element of market housing is allowed to cross-subsidise the affordable housing and to meet market demand. The target of 45% affordable homes is necessary to justify residential development in this protected environment, the requirement is for on-site delivery and is directly related to the development, and is reasonable in scale.

All Q4 Justification for Policy Requirements?

39. Affordable Housing requirement is justified. See below regarding custom and self-build. No other policy requirements.

All Q5 Allocation wording clear and effective?

40. This is a straightforward allocation and is appropriate for this site.

All Q6 Overall soundness

41. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.7 (2) Land at Lamb Park, Chagford **Site Specific Question**

Q1. What is the justification for custom and self-build housing/community led housing?

42. The previous plan period saw 93 homes, including 28 affordable, delivered in the village of Chagford. This was the largest commercially-led residential development in the National Park.
43. This has satisfied the local need for affordable and market housing through at least the first 10 years of this local plan period. DNPA is committed to working with landowners and the community to enable self and custom-build as set out in legislation^[1] and as per NPPF para 61 which specifically requires Authorities to plan for people wishing to commission or build their own homes. With the affordable and market housing needs fulfilled, Chagford represents a unique opportunity to support this sector, and wider diversity in housing.
44. The owners of the site (respondent number 184), have submitted a response including indicative site plans, confirming that *"it is intended that the entire site will come forward as a custom build housing scheme. The affordable part of the scheme will be delivered working in close collaboration with Chagford Community Land Trust, representing Chagford Community."*

Proposal 7.8 (2) Land at Crannaforde, Chagford

All Q1 Justified policy? Viable/ deliverable?

45. The 2018 Employment Land Review [SD148], highlighted the need for employment land. This is particularly relevant in Chagford to help rebalance the self-containment following housing delivered in the previous plan period.
46. As a part-brownfield site and regeneration opportunity this is a justified and unique opportunity. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD180).

All Q2 Timescale? Realistic?

47. Discussions with landowners are ongoing and employment space delivery should commence during years 6-10 of the plan period. This delay is to allow time for business case development and funding for employment space.

All Q3 AH Justification/Viability/AH obligations policy compliant?

48. N/A (non-residential)

All Q4 Justification for Policy Requirements?

49. The policy requirements (a) and (c) in relation to highways access and cycle pedestrian access are necessary to enable safe and sustainable travel.
50. Requirement (b) provides additional control to ensure that any rural enterprises meet a higher design quality standard than the existing rural enterprises which the Employment Land Review categorised as poor quality.

All Q5 Allocation wording clear and effective?

51. See below; due to changes to the Use Class Order the reference to "mixed B class" a modification is proposed.

All Q6 Overall soundness

52. Subject to the above modification in relation to "B class" we consider the proposed allocations to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.8(2) Crannafords, Chagford Site Specific Question**Q2. Would the requirement for improved cycle and pedestrian access to Chagford be justified and effective? Is a modification required, to ensure that the Plan is sound, in light of the recent changes to the UCO?**

53. One of the factors in allocating this site for employment use is the opportunity to provide employment which is accessible via walking and cycling. The site is around 650m from joining the pavement into town along a level route much of which has good forward visibility. The expectations for cycling and can be met working in conjunction with the Highways Authority to identify a phased improvements approach. A public project is already in early stages which may provide an opportunity to deliver this link in part.
54. Regarding the Use Class Order, the reference to "mixed B class uses" is not appropriate. Reference to B class will exclude B1 which is now in Class E, and Class E is not appropriate because it includes retail and other uses which would not be sustainable located remote from town. Consequently, a proposed modification of the text reads:

MM54	Proposal 7.8(2)	Proposal 7.8 (2) An area of land at the Crannafords employment area, Chagford, is allocated for business and employment uses (non-main town centre uses) (mixed B class uses).
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Horrabridge

Proposal 7.9 (2) Land at New Park, Horrabridge

All Q1 Justified policy? Viable/ deliverable?

55. The Horrabridge Settlement Profile [SD195] confirms that there will be growth in housing need for the town and this site was found to be the most appropriate and deliverable through the LAA process. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD181)

All Q2 Timescale? Realistic?

56. Residential development expected in years 6 to 10 of the plan period. The site is available and deliverable, and the landowner's agent confirmed intent. However, the landowner has not commenced technical studies and preparation of an application.

All Q3 AH Justification/Viability/AH obligations policy compliant?

57. Submission documents clarify that the overriding need in the national park is for affordable housing.
58. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The plan viability [SD90 and SD91] supports the view that this scheme is viable.

All Q4 Justification for Policy Requirements?

59. It is not expected that the entire area of the red line is developable; an area along the river Walkham will need to provide biodiversity corridor and flood storage. Consequently, the design will not only need to incorporate onsite SUDS attenuation but flood zone considerations. It is assumed this can be addressed through landscaping and layout rather than costly hard infrastructure.
60. Contributions towards local sports are required as explained in the Open space sport and recreation study [SD141] which notes that pitch drainage and pavilion upgrading are needed.
61. The requirement for mining assessment is necessary in light of former extraction work in the area to ensure appropriate ground conditions or identify required stabilisation.

All Q5 Allocation wording clear and effective?

62. This is a straightforward allocation with appropriate and necessary criteria and requirements.

All Q6 Overall soundness

63. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy

Moretonhampstead

Proposal 7.10 (2) Land at Betton Way, Moretonhampstead

All Q1 Justified policy? Viable/ deliverable?

64. The Moretonhampstead Settlement Profile [SD196] confirms that there is a need to provide for some growth in the town. With insufficient brownfield land available, this greenfield site has few constraints and is bounded on three sides by existing housing. With no abnormal site costs the site is deliverable and viable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD182].

All Q2 Timescale? Realistic?

65. Residential development in Years 10 to 15 based on advice from owners agent, who confirms deliverability of the scheme but is not yet ready to undertake technical work.

All Q3 AH Justification/Viability/AH obligations policy compliant?

66. Submission documents clarify that the overriding need in the National Park is for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The viability assessments [SD90 and SD91] support the view that this scheme is viable.

All Q4 Justification for Policy Requirements?

67. Seeking an element of custom and self-build housing on this site is designed to meet statutory requirements and to complement the level of market and affordable housing delivery coming forward on other sites.

All Q5 Allocation wording clear and effective?

68. This is a straightforward residential allocation with appropriate criteria.

All Q6 Overall soundness

69. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.11 (2) Land at Forder Farm, Moretonhampstead

All Q1 Justified policy? Viable/ deliverable?

70. The Moretonhampstead Settlement Profile [SD196] confirms that there is a need to provide for some growth in the town. With insufficient brownfield land available, this greenfield site has few constraints and being adjacent to the built-up area with no abnormal costs is deliverable and viable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD183].

All Q2 Timescale? Realistic?

71. Years 1 to 5 is realistic given that the approval of an outline application, and completion of the S106 which confirms housebuilder commitments.

All Q3 AH Justification/Viability/AH obligations policy compliant?

72. The Housing Topic paper [SD106] and the housing market needs assessment and demographic reports clarify the high level of affordable housing need in the National Park is for affordable housing.
73. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The plan viability [SD90 and SD91] assessments support the view that this scheme is viable.

All Q4 Justification for Policy Requirements?

74. No additional policy requirements.

All Q5 Allocation wording clear and effective?

75. Straightforward allocation is appropriate for this site.

All Q6 Overall soundness

76. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.11(2) Forder Farm, Moretonhampstead Site Specific Question**Q1. What is the justification for the indicative dwelling capacity on this site, in light of an extant planning permission for 30 dwellings?**

77. The extant permission is an outline permission which has been issued as "up to 30 dwellings" while the allocation text is identified as "around 25". Should final design confirm that 30 dwellings can be achieved along with require on-site infrastructure (SUDS, access, parking etc) then this will be additional land supply.
78. Proposed Main modification MM25 is proposed as follows:

MM35	Proposal 7.11 (2)	An area of land at Forder Farm is allocated for residential development of around 25 <u>30</u> homes, of which not less than 45% must be affordable housing to meet identified local needs.
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Proposal 7.12 (2) Land at Thompson's Haulage Depot, Moretonhampstead**All Q1 Justified policy? Viable/ deliverable?**

79. Application 0588/19 for redevelopment as 35 residential dwellings has been approved. The application details confirm that the scheme is deliverable and viable. As a brownfield redevelopment opportunity this site makes an important contribution to the future housing supply needs of the area. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD184).

All Q2 Timescale? Realistic?

80. Years 1 to 5 as confirmed by applicants intentions

All Q3 AH Justification/Viability/AH obligations policy compliant?

81. The policy requirement for affordable housing is justified given the high levels of affordable housing need in the National Park. However, with the application of vacant building credit, a national incentive that applies within the National Park, no affordable housing contributions are being delivered from this development. The AH requirement remains however in the event that the existing buildings are re-occupied in advance of any alternative development proposal (obviating the vacant building credit).

All Q4 Justification for Policy Requirements?

82. A number of criteria are included in the allocation to provide greater control over design issues, flood assessment and mitigation and access arrangements. These are all site-specific and required in order to deliver sustainable development whilst obviating negative impacts.

All Q5 Allocation wording clear and effective?

83. This is a straightforward residential allocation with appropriate criteria.

All Q6 Overall soundness

84. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

PrincetownPolicy 7.13 (2) Land at Dartmoor Prison, Princetown**All Q1 Justified policy? Viable/ deliverable?**

85. This site has historic and economic significance and has the potential to be a major development project in the National Park. A site allocation policy is needed to ensure specific controls over development are introduced to guide potential future development.

All Q2 Timescale? Realistic?

86. The timescale is unknown and depends on HMP estates plans. It was announced in October 2019 that Ministry of Justice planned for HMP Dartmoor to close in 2023.

All Q3 AH Justification/Viability/AH obligations policy compliant?

87. N/A. Strategic housing policies 3.1, 3.2 and 3.3 will guide decisions in relation to affordable housing. These policies are well-evidenced and justified.

All Q4 Justification for Policy Requirements?

88. A masterplan will ensure that any proposal for redevelopment has been considered as a whole and in relation to the surrounding area. The (predominately) Grade II listed prison complex is significant historically and architecturally and this will require specific consideration and efforts to secure conservation as well as minimising any negative effects. As a major employer with a far reaching supply chain it is critical that the economic impacts on proposals.

All Q5 Allocation wording clear and effective?

89. The requirements set out in policy provide specific and sufficient guidelines for decision making.

All Q6 Overall soundness

90. Yes. The proposed site policy has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Princetown Policy 7.13(2) Site Specific Question

Q1. In the absence of any allocations to deliver new homes, how would the Plan meet identified housing need in this settlement? What evidence is there that windfall and infill would deliver to meet that need?

91. Topic Paper 9 [SD110] notes that there are three infill/brownfield sites within the settlement boundary that are easily achievable. The Land Availability Assessment for Princetown [SD170] provides details of these sites, namely:
- DNP10/058 and DNP10/058
Land at Moorland View
3 to 8 dwellings
 - DNP16/079
"Various sites" in Princetown
13-19 dwellings

Two of these sites are in Council/Authority ownership and all are achievable.

92. These brownfield, infill plots at a Local Centre are policy compliant and there are no policy requirements that would justify having a site allocation policy. These have not been counted in the housing trajectory but present a known windfall opportunity.
93. Princetown has a high existing stock of affordable and rented housing (Duchy of Cornwall ownership). This means the settlement benefits significantly from the availability of affordable and private rented re-lets within the community resulting in a typically lower affordable housing need compared with settlements of its size.

South Brent

Proposal 7.14 (2) Land at Palstone Lane(a)

All Q1 Justified policy? Viable/ deliverable?

94. South Brent is a Local Centre and area of demonstrated housing need and site selection process confirms this greenfield site is most appropriate for allocation. Site assessment and landowner intentions confirm the site is viable and deliverable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD185].

All Q2 Timescale? Realistic?

95. Delivery in Years 1 to 5. The application for development of 17 dwellings is working through planning (ref [0147/19](#)). The development proposal is supported by the local housing authority and has had assistance from South Hams District Council Community Housing Fund on land acquired by the Council to support the scheme.

All Q3 AH Justification/Viability/AH obligations policy compliant?

96. The South Brent Settlement Profile [SD198] confirms the level of affordable housing need. The application for the scheme to deliver 70% Affordable Housing is supported by a viability assessment, undertaken by Plymouth City Council. The housing needs assessment and the Community Land Trust's own information confirm demand for this tenure. Development of this site provides an opportunity for the Authority to meet its duty under the self and custom housebuilding legislation and NPPF 61 to provide plots which meet a need for this type of housing.

All Q4 Justification for Policy Requirements?

97. Requirement 1 (AH) is justified (as above). Requirement 2 ensures that access arrangements are designed and delivered in a way that supports future delivery of adjacent allocation. Policy requirements in relation to evidence to Habitats evidence is a specific requirement of the Habitat Regs Assessment [SD78] because the site is within the GHB connectivity zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

98. This is a straightforward residential allocation with appropriate criteria.

All Q6 Overall soundness

99. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.15 (2) Land at Palstone Lane(b)

All Q1 Justified policy? Viable/ deliverable?

100. South Brent is a Local Centre and area of demonstrated housing need and site selection process confirms this greenfield site is most appropriate for allocation. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD186].

All Q2 Timescale? Realistic?

101. Delivery is expected in years 6 to 10 or 11 to 15. There are no unusual obstacles to delivery in policy but delayed delivery is anticipated as the landowner has not begun technical work.

All Q3 AH Justification/Viability/AH obligations policy compliant?

102. The South Brent Settlement Profile [SD198] confirms the level of affordable housing is justified and this has been considered through site assessment and viability assessment.

All Q4 Justification for Policy Requirements?

103. Requirement 1 (AH) is justified (as above). Requirement 2 ensures that access arrangements are designed and delivered in a way that supports future delivery of adjacent allocation. Requirement 3 ensures reasonable control over HRA site impacts and is a specific requirement of the Habitat Regulations Assessment [SD78] because the site is within the GHB connectivity zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

104. This is a straightforward residential allocation with appropriate criteria.

All Q6 Overall soundness

105. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposals 7.14(2)(a) and 7.15(2)(b) Palstone Lane, South Brent **Site Specific Question**

Q1. In light of identified highway constraints would these sites be likely to be developed within the Plan period?

106. 7.14(2) and 7.15(2) are in the same ownership. Work to ensure safe pedestrian, cycle and vehicle access is confirmed that solutions appropriate to the scale of development and existing road layout and use can be achieved. The Highways Authority comments on the current application (7.14(2)(a)) confirm that the development can be achieved and clarify the rural shared use character of the lane. The application for this development provides for the access route, in order to enable the further part of this landowner's site to come forward. Access from Middle Green is likely the most appropriate in highway terms, although there is a third

party landownership; however no viable ransom exists as alternative highway access is achievable.

Proposal 7.16 (2) Land at Fairfield

All Q1 Justified policy? Viable/ deliverable?

107. This allocation appears in the current local plan. Full permission has been granted (ref 0346/18) and the scheme is under construction. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD187].

All Q2 Timescale? Realistic?

108. Some delivery in Years 1 to 5 of plan period – some completions in the current monitoring period.

All Q3 AH Justification/Viability/AH obligations policy compliant?

109. Submission documents and approved application clarify that the allocation complies with the NPPF.

All Q4 Justification for Policy Requirements?

110. Policy requirements set out issues for reasonable control. Extant permission has met all requirements.

All Q5 Allocation wording clear and effective?

111. This is a straightforward residential allocation with appropriate criteria.

All Q6 Overall soundness

112. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.17 (2) Land at Station Yard

All Q1 Justified policy? Viable/ deliverable?

113. This is a safeguarding policy and NPPF (Paragraph 117) confirms that it is appropriate to safeguard areas to ensure health and wellbeing – this would include transport facilities.

All Q2 Timescale? Realistic?

114. Timescale for delivery is dependent on activities of the Office of Rail Regulation, the Peninsula Rail Task Force, Devon County and others.

All Q3 AH Justification/Viability/AH obligations policy compliant?

115. n/a – non residential

All Q4 Justification for Policy Requirements?

116. Requirement 2 ensures reasonable control over HRA site impacts and is a specific requirement of the Habitat Regs Assessment [SD78] because the

site is within the GHB connectivity zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

117. This is a straightforward site safeguarding site policy.

All Q6 Overall soundness

118. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

YelvertonProposal 7.18 (2) Land at Elfordtown, Yelverton**All Q1 Justified policy? Viable/ deliverable?**

119. Yelverton is a Local Centre and area of demonstrated housing need and site selection process confirms this greenfield site is most appropriate for allocation. Site assessment and landowner intentions confirm the site is viable and deliverable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD188].

All Q2 Timescale? Realistic?

120. Delivery is anticipated in years 11 to 15. There are no constraints to earlier delivery, but landowner agent confirms that limited preparatory work has been undertaken so delivery in years 1 to 5 is unlikely.

All Q3 AH Justification/Viability/AH obligations policy compliant?

121. The Yelverton settlement profile [SD199] and the Housing Topic paper [SD106] confirm the need for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The viability assessments [SD90 and SD91] support the view that this scheme is viable.

All Q4 Justification for Policy Requirements?

122. No additional policy requirements are set out. The site development site brief [SD188] highlights site considerations, all of which can be assessed through development management.

All Q5 Allocation wording clear and effective?

123. Straightforward allocation is appropriate for this site.

All Q6 Overall soundness

124. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.19 (2) Land at Binkham Hill, Yelverton**All Q1 Justified policy? Viable/ deliverable?**

125. Yelverton is a Local Centre and area of demonstrated housing need and site selection process confirms this greenfield site is most appropriate for allocation. Site assessment and landowner intentions confirm the site is viable and deliverable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD189).

All Q2 Timescale? Realistic?

126. Development is anticipated in Years 5 to 6 of the Local Plan. This provides adequate lead in time for technical work and site servicing (including access arrangements).

All Q3 AH Justification/Viability/AH obligations policy compliant?

127. The Yelverton settlement profile [SD199] and the Housing Topic paper [SD106] confirms the need for affordable housing. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The viability assessments [SD90 and SD91] support the view that this scheme is viable.

All Q4 Justification for Policy Requirements?

128. Policy requirement related to landscaping is to provide specific control to ensure enhancements to public and neighbouring amenity in a wholistic manner. Requirements in relation to pedestrian/cycle network and highway improvements are in the interest of safety and wellbeing and are justified.

All Q5 Allocation wording clear and effective?

129. Two modifications to wording of this policy are proposed to correct details.

MM36	Proposal 7.19(2)	2(b)	Provide a link to the Drake's Trail <u>Princetown cycle trail</u> ; and
MM37	Proposal 7.19(2)	2(c)	Include delivery of appropriate highway improvements to access Plymouth <u>Dousland Road</u>

Subject to these clarifications the policy will be robust.

All Q6 Overall soundness

130. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.19(2) Binkham Hill, Yelverton Site Specific Question**Q1. Would modifications be necessary to ensure requirements for highway and cycle way improvements are effective? Would development of this site give rise to any other infrastructure requirements?**

131. Subject to the changes to road/trail names set out in MM26 and MM27 the allocation text will be robust. Site context, survey and design requirements, and delivery requirements are set out in the site development brief (SD189).

132. Access to the highway network is achievable and there is adequate land and visibility for either roundabout or T junction. Safe pedestrian access

already exists to the south of the site (Binkham Hill) and introduction of new footways and crossings will ensure safe access on the wider network. Foul drainage will be via the existing sewerage network, possibly through gravity feed or through standard pumping infrastructure, and sufficient capacity is available.

Buckfast

Proposal 7.21 (2) Land at Axminster Carpets, Buckfast

All Q1 Justified policy? Viable/ deliverable?

133. As a brownfield mixed use site at a Rural Settlement this allocation complies with the spatial strategy and national policies. Based on submitted information supporting the planning application (0300/19) the scheme is deliverable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD190].

All Q2 Timescale? Realistic?

134. Development delivery in years 1 to 5 and 6 to 10. Application has resolution to approve (0300/19)

All Q3 AH Justification/Viability/AH obligations policy compliant?

135. The requirement for a level of affordable housing is justified given the high levels of affordable housing need. However Vacant Building Credit is likely to apply to proposals on this site.

All Q4 Justification for Policy Requirements?

136. This large site has traditionally formed a key part of the local economy. Requirements for mixed use and employment uses are necessary to ensure this is not lost. The Housing Topic paper [SD106] makes it clear that there is an overriding need to support the large, and growing, older population of the National Park and this site provides the best access to wider medical and social care services.

137. In relation to heritage requirements, the NPPF makes it clear that policies should limit harms to heritage assets, such as the Grade II* Buckfast Abbey and a number of surrounding listed buildings and structures. The requirements for cycling and pedestrian facilities are justified to provide safe and sustainable access. Flood assessment and information to support HRA assessments are required to provide appropriate planning controls. Policy requirements in relation to evidence to Habitats evidence is a specific requirement of the Habitat Regs Assessment [SD78] because the site is within the GHB connectivity zone associated with the South Hams SAC.

All Q5 Allocation wording clear and effective?

138. Proposed modifications seek to ensure clarity, and reflect changes to the UCO (see below). Subject to these changes the site allocation is effective and clear.

MM55	Proposal 7.21 (2)	(1b)	b) Commercial uses comprising principally business and industrial uses (B1, non-main town centre Class E , B2 and B8), financial and professional services (A2) , and assembly and leisure uses (non-main town centre Class E and F2). <u>Any main town centre uses should be of a scale and use commensurate with Buckfast and its local highway network.</u>
MM39	Proposal 7.21(2)	(2a)	provide a level of employment which <u>is not less than offsets the loss of the previous</u> employment use space

All Q6 Overall soundness

139. Subject to the changes referenced in 2Q5 above we consider the proposed allocations to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.21(2) Axminster Carpets, Buckfast **Site Specific Question**

Q1. What is the justification for the absence of indicative capacity for commercial uses and residential care elements of this proposal?

140. In principle this brownfield redevelopment opportunity could be either employment led or residential led, subject to detailed considerations. Consequently the balance of m² for any particular use would not be possible to determine *a priori*. The policy makes it clear that there should be a mix of uses and that it must provide employment opportunities (which includes health and social care employment).

Q2. Would the proposal, as a whole, fall within the definition of Major Development set out in policy 1.5(2) and if so what would be the implications?

141. The Development Management Committee report (6 November 2020) consider at Section 10 the Major Development test. It concluded "Having regard to the character, nature and scale of the proposed development, its juxtaposition to the Buckfast Abbey estate and Buckfast village, it is not considered to be major development in the context of paragraph 172 of the NPPF 2019 such that it would lead to harmful impacts on the National Park.

Q3. Is a modification required to ensure that the level of employment offsets the previous employment use in the interests of soundness? For the same reason, is a modification required, to ensure that the Plan is sound, in light of the recent changes to the UCO?

142. Proposed modifications are described and proposed at Q5 (paragraph 138) above.

Mary Tavy

Proposal 7.22 (2) Land off Warren Road

All Q1 Justified policy? Viable/ deliverable?

143. This is a safeguarding policy and NPPF 117 confirms that it is appropriate to safeguard areas to ensure health and wellbeing – this would include educational facilities. Comments on viability and deliverability are addressed below.

All Q2 Timescale? Realistic?

144. Years 6 to 10 or 11 to 15 depending on project funding (see response below)

All Q3 AH Justification/Viability/AH obligations policy compliant?

145. N/A – non residential

All Q4 Justification for Policy Requirements?

146. There are no specific policy criteria or requirements.

All Q5 Allocation wording clear and effective?

147. This is a straightforward site safeguarding site policy.

All Q6 Overall soundness

148. Yes. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

Proposal 7.22(2) Warren Rd, Mary Tavy **Site Specific Question**

Q1. In light of the acknowledged lack of funding for a school on this site, would the site be likely to be developed within the Plan period and if not would its safeguarding be justified?

149. Local education in Devon is delivered through academy trusts who have a high degree of autonomy in making decisions on facility development. Whilst funding is not allocated a present the allocation increases the likelihood that a replacement school may come forward on this site.

Devon County Council (Respondent 0049) supports this policy noting that "Allocation of the site for the relocation of the primary school would put the school and community in a stronger position should funding become available in the future."

150. The settlement boundary has **not** been re-drawn and any proposed development other than that set out in the policy would be clearly contrary to the local plan.

Proposal 7.23 (2) Land in Mary Tavy

All Q1 Justified policy? Viable/ deliverable?

151. As a part-brownfield infill site at a Rural Settlement this allocation complies with the spatial strategy. Based on site assessment, landowner communication and comparable schemes the site is assessed as deliverable. Site context, survey and design requirements, and delivery requirements are set out in the site development brief [SD191].

All Q2 Timescale? Realistic?

152. Years 1 to 5 for initial development. Potential for delivery as two separate developments which could include some delivery in years 6 to 10.

All Q3 AH Justification/Viability/AH obligations policy compliant?

153. The Mary Tavy settlement profile [SD218] confirms there is affordable housing need in the settlement. Site reviews considered likely capacity, site servicing costs and market values in a broad assessment of viability. The viability assessments [SD90 and SD91] support the view that this scheme is viable.

All Q4 Justification for Policy Requirements?

154. The affordable housing requirements are justified by housing market and other evidence. The requirements in relation to parking, public amenity and traffic calming are to ensure that the development provides safe movement and access and mitigates impacts on the area from loss of existing parking and circulation space.

All Q5 Allocation wording clear and effective?

155. This is a residential allocation with appropriate and necessary criteria and requirements.

All Q6 Overall soundness

156. The proposed allocation has been assessed and is considered to be justified, effective, and supported by underpinning evidence and national policy.

[\[1\]](#) Housing and Planning Act 2016 and Self Build and Custom Housebuilding Act 2015 (as amended)