



Dartmoor National Park Authority

**Draft Housing Supplementary Planning
Document (SPD)**

Statement of Consultation

December 2023

1. Introduction

1.1.1 Dartmoor National Park Authority (DNPA) consulted on a draft Housing Supplementary Planning Document (SPD) in February 2023. The SPD provides additional guidance to support the delivery of housing in Dartmoor National Park.

1.2 About the SPD

1.2.1 The Housing SPD provides detailed guidance on the housing policies in the Dartmoor Local Plan 2018 – 2036, adopted in 2021. The SPD is of particular relevance to those involved with assessing local housing need and delivering all types of housing in the National Park.

1.2.2 The SPD provides guidance on how Local Plan housing policies will be assessed and implemented. The topics covered in the SPD are:

- Defining and identifying local housing need
- Affordable Housing tenure management, delivery, and viability
- Custom and Self-Build housing
- Gypsy and traveller accommodation
- Eligibility for specific housing types
- Community led housing
- Housing size and accessibility
- Community engagement for housing proposals
- Rural exception sites

1.3 Consultation process

1.3.1 The consultation opened on 6th February and closed on 27th March 2023. The Draft Housing SPD was made available online¹ together with a comment form that consultees could use to submit their comments by post or email. While use of the form was encouraged, it was not compulsory, and comments submitted not using the form were accepted.

1.3.2 Engagement as part of the consultation procedure included:

- Email consultation with Forward Planning's policy consultee list, which includes a broad range of around 400 statutory and non-statutory consultees with an interest in Dartmoor
- Dartmoor homepage website link directly to the consultation, supported by various other links throughout the Dartmoor website, including the planning homepage (see Figure 1.1)
- Social media publicity throughout the consultation via Twitter and Facebook (see Figure 1.1)
- 2 virtual drop-in events held via Teams, for the general public and Town and Parish Councils
- A further drop-in event was offered to agents but did not run because of lack of interest
- Various 'deep-dive' meetings with officers, specialists and other internal and external stakeholders

¹ [Dartmoor Housing SPD webpage](#)

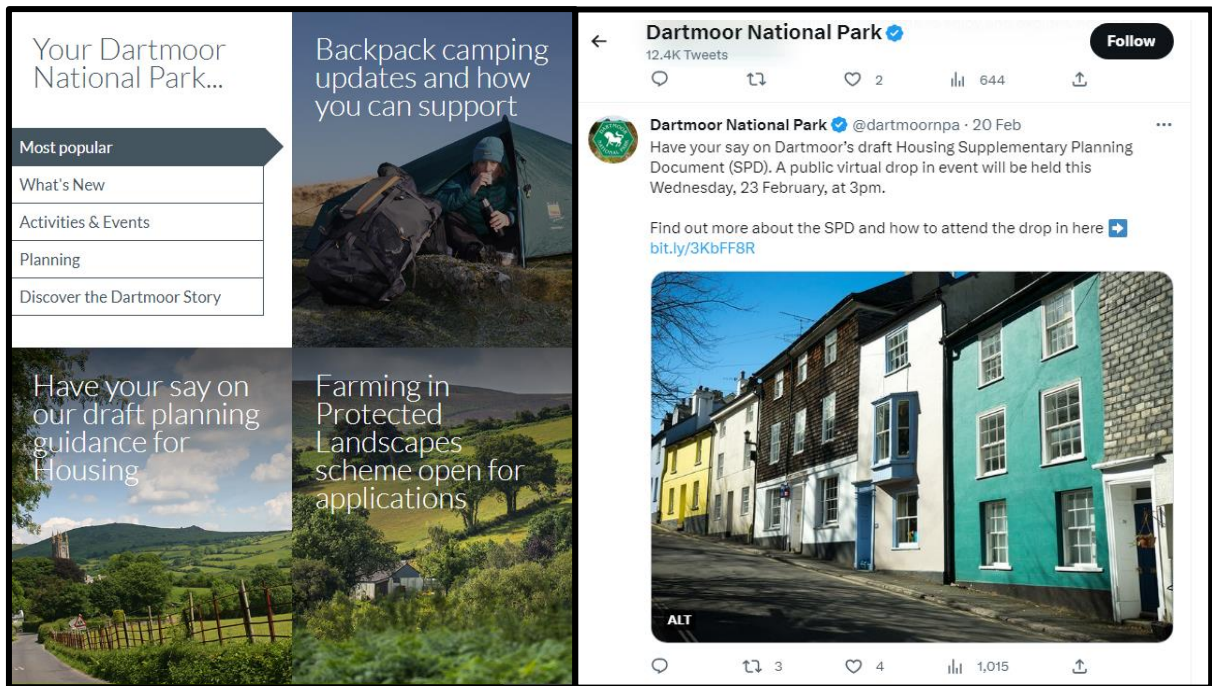


Figure 1.1 – Example publicity shared throughout the Draft Housing SPD consultation, Link to Draft Housing SPD consultation on Dartmoor National Park Authority website and Twitter post.

1.3.3 National Planning Practice Guidance confirms that SPDs do not require an SA, but may in exceptional circumstances require an SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan. As part of the consultation DNPA produced an SA/SEA Scoping Assessment which concluded the SPD did not require SEA. Historic England, Natural England and the Environment Agency were consulted for their views on this conclusion and, in response, all these organisations concluded they agreed.

2. Consultation Responses

2.1.1 There were 30 responses to the public consultation:

- 3 Housing Authorities (South Hams, West Devon and Teignbridge) and Devon County Council
- 6 Registered Providers of affordable housing
- Statutory Consultees
 - Highway England
 - Historic England
 - Natural England
 - Environment Agency
 - Coal Authority
- 3 Parish and Town Councils
- Devon Communities Together
- 2 interest groups for rural small enterprise
- 9 individuals

2.1.2 Responses were broadly supportive, particularly highlighting the clarity of the document and its commitment to providing guidance on detailed housing matters.

- 2.1.3 Registered housing providers and the Housing Authorities raised specific queries related to priorities for affordable housing delivery, affordable housing tenures and the operation of housing allocations. Housing Authorities, Parish and Town Councils, Devon Communities Together commented on the details of undertaking Housing Needs Assessments.
- 2.1.4 Individuals raised a number of issues, some of these were outside the scope of the SPD and which were more related to the Local Plan making process, site allocations and development management. Comments were noted and recorded for discussion as appropriate.
- 2.1.5 A summary of issues raised in relation to each section of the SPD is set out below. The Annex includes detailed comments, responses and corresponding changes made. A track changes version of the SPD is provided so proposed changes can be tracked.

2.2 Chapter 2: General principles

- 2.2.1 The flow diagram illustrating the typical process to bringing forward housing sites was well received and did not require substantive amendment. Some comments sought further detailed information, but this was not felt in scope for a summary diagram.

2.3 Chapter 3: Defining and identifying local housing need

- 2.3.1 Respondents identified some particular circumstances for identifying housing need, not addressed by the SPD, including meeting needs for settlements outside the National Park but within Parishes considered substantially within the National Park. This has been addressed.
- 2.3.2 There were significant comments on the detail of Housing Needs Assessments (HNAs), how they were to be used and process for undertaking them. Generally, it was considered providing minimum requirements for HNAs provides clear and consistent guidance on how these assessments should be carried out.
- 2.3.3 There is ongoing work needed to ensure that displaced residents, those local households in housing need who have had to move out of the parish and who can be underrepresented in HNAs, are contacted and better represented in the future.
- 2.3.4 An addition was made highlighting the potential for HNAs to identify needs of older people and those in need of adapted and supported housing. It will become increasingly important to meet these needs as Dartmoor's population ages.

2.4 Chapter 4: Affordable Housing

- 2.4.1 In response to comments from Housing Authorities the SPD has been amended to acknowledge that social rent is the preferred and most frequently needed tenure on Dartmoor.
- 2.4.2 There was strong support for inclusion of Band E ('no housing need') applicants in the definition of affordable housing need within the defined parameters. To reflect national standards the threshold portion of household income spent on housing costs was increased to 30%, from 25%.

2.4.3 Restricted staircasing of shared ownership affordable homes to 80% was raised by some housing associations and Local Housing Authorities as unfavourable to delivery as it reduces financing options and reduces development value. 100% staircasing allows an occupier to purchase the dwelling as an open market unit and is not supported by policy. The National Park is identified as a Designated Protected Area (DPA) by sections 300 and 302 of the Housing and Regeneration Act 2008, which imposes these restrictions unless the LPA agree to a waiver. As affordable housing is hard to replace in the National Park, national and local policy focus on the provision of affordable housing in perpetuity and do not enable 100% staircasing of a shared ownership home. The overriding need to retain affordable homes in the National Park has been long established, and it is considered shared ownership housing can still operate within this restriction. Indeed some other rural focussed Housing Associations continue to actively support its delivery in rural areas.

2.5 Chapter 7: Rural Workers Housing;

2.5.1 We received opposed responses with regards using minimum wage as a benchmark for the financial test when assessing applicants for rural workers housing. Respondents requested that proportionately lower earnings should be allowed where household savings are made through use of goods produced on-site. A respondent also requested that the test go further and require a 2.5% return on capital investment.

2.5.2 Detailed additions were made following internal consultation to ensure the guidance fully reflected Local Plan policy and was clear and unambiguous.

2.6 Chapter 8: Determining eligibility for different housing types

2.6.1 Several housing associations and one of the LHAs raised the issue of requiring two weeks' notice to DNPA and the relevant Parish/Town Council(s) prior to advertising vacant rental property on Devon Home Choice (at 8.2.6). The intent here is to ensure that sufficient notice is provided, and potential applicants are notified well in advance of new properties being advertised. It is acknowledged that this produces issues for quickly recycling vacant stock on re-lets and a minor change is therefore proposed to reduce the advertisement period to 1 week on re-lets.

2.7 Chapter 9: Other Housing Matters

2.7.1 In response to Housing Associations an addition was made recognising how registered providers have successfully worked with Community Land Trusts (CLTs) to bring about wider community benefits to development.

2.7.2 Several consultees noted that Nationally Described Space Standards (NDSS) may not provide enough space where specific wheelchair adaptations are required. Consequently flexibility has been added with the addition of criteria where housing providers consider increases above NDSS are required to enable accessibility or specialist equipment.

3. Detailed comments and DNPA response

Paragraph	Comment	Response
General		
General	West Devon is a Borough and not District Council	Noted, amendments made.
	The guidance could go further and include guidance related to how flood risk should be managed when bringing forwards housing sites.	Noted, although this is considered beyond the scope of this SPD.
	The SPD should include more information on improving energy efficiency in housing.	Unfortunately this was not in scope for this SPD, but will be considered for inclusion in an update to our Design Guide due to be undertaken in 2024.
	The SPD should include more information on managing infrastructure improvements over the long term.	The Infrastructure Delivery Plan (IDP) assesses the necessary infrastructure improvements over the plan period and considers how these should be funded. Reference to IDP is included in SPD.
Section 2: Bringing Forward Housing Sites		
2	The SPD presents an opportunity to set out how the sequential approach to flood risk should be applied to housing on Dartmoor.	Guidance on addressing environmental constraints is not within scope of this Housing SPD.
2.1.2	Step 3: 'All but the smallest scheme' should be defined.	Strategic Policy 3.1 provides thresholds for each type of settlement tier. This diagram is intended as a summary, it cannot provide all this detail and remain a summary.
2.1.2	The document should refer to the SHLAA and advise how this exercise informs site allocations.	Guidance on the broader Local Plan plan-making and site allocation process is not within scope of this SPD.
Section 3: Defining and Identifying Local Housing Needs		
3	Document should reference need to support provision of a more diverse supply of older persons, supported and adapted housing.	Noted, additions made to HNA guidance at 3.6.11 and further explanation at 3.7.
3.1.2	Definition of housing need should include Band E, West Devon include Band E applicants on their housing register.	Band E is an open category within the housing register and includes all households not considered in housing need. The SPD appropriately includes households in Band E where they meet the agreed definition of housing need.
3.1.2	Local Needs Custom and Self-Build: Definition of principal residence should be included.	Principal residence is generally defined for financial and tax purposes, it means someone's main residence. Addition made.
3.1.2	Gypsy and traveller: Consider provision for people wanting to move out of Gypsy and traveller accommodation into 'bricks and mortar'.	There is no scope to specifically provide for these needs in the Local Plan, other than where they arise due to a household coming into housing need. The guidance provides for this scenario, otherwise it expected for these communities to access housing through the open market.
3.1.3	Reports should be provided to support vacant building credit claims	Proportionate evidence is required to demonstrate sufficient evidence to support vacant building credit, please refer to our Local Validation List which requires a statement be submitted.

3.1.3	Further detail should be provided on what community enhancement is, and applicants should submit full reports to demonstrate compliance.	Section 11.3 sets out requirements for providing community infrastructure and/or employment space.
3.2	Concern at rate of housing lost to short term lets	This Housing SPD cannot change the adopted policies within the Local Plan and Local Plan policy is not currently able to control use of the existing housing stock for short term lets and second homes. <u>Recent Government consultation</u> proposes changes to allow for control of short term lets, which will need to be considered in the next Local Plan Review.
3.2	Suggestion that a further option be allowed for housing needs assessment refreshes, to allow for local connection testing of housing register applicants.	Amendment made to paragraph 3.6.16.
3.3	Concern there is no approach overlapping survey geographies may lead to repeat survey of some communities and survey fatigue.	Noted, this is a risk and needs to be managed with those commissioning HNAs.
3.3.1	Concern the geography of need for a Village and Hamlet could result in small settlements being expected to meet the needs of a Rural Settlement.	The needs of adjoining rural parishes are only to be considered to be met within a Village and Hamlet where there is agreement from the Parish Council.
3.3.6	Housing register data should be sufficient to justify housing need.	This approach is not supported by Local Plan Strategic Policy 3.1 and it is not within the scope of this SPD to amend policy. This situation will be assessed at the next LP Review. Housing register can be used to complement and triangulate survey results.
3.4.1	Allocations Plan should include Local Lettings Plan for terminology reasons.	Noted, addition made.
3.6.2	Clarity on who is expected to pay for HNAs.	This will be case by case and it's not possible for the guidance to identify a particular party.
3.6.2	Concern at the additional resource implications for community engagement before, during and after HNAs.	Community engagement is an important part of all HNAs and is typically supported by the relevant Council Housing team. Current practices of discussion before, during and after the survey are sufficient to meet this requirement.
3.6.2	Concern requirements to make reports publicly available conflicts with client sensitivity.	Noted, point amended. HNAs must be made public at planning application stage at the latest.
3.6.3	Displaced residents is a known issue affecting HNA results and should be addressed.	This is a known issue and requires strong community engagement to identify households that have been or are at risk of displacement. Amendments made to ensure surveys should question residents on displaced households, allow for electronic survey return, and encourage communities to forward surveys to displaced households.

3.6.8	Ensure participation in HNAs are not restricted by ill health, illiteracy, lack of access to communications, and language barriers.	A blend of paper and electronic survey, with support of the Parish Council is considered appropriate and covers most of the disadvantaged population.
3.6.10	Affordability of respondents should also consider savings.	Agreed, change made consistent with our definition of housing need.
3.6.11	There should be a benchmark response rate for survey considered to be robust.	Unfortunately this is not possible as all communities are different and the surveys are self-selecting to a degree (i.e. responses are more likely to be received by households that are in housing need)
Section 4: Affordable Housing		
4.1.3	General affordable housing provision in the National Park should not be protected in perpetuity, as it unnecessarily restricts RPs financing options.	Delivering affordable housing in perpetuity is a national and local policy matter which is not within scope of the SPD to change. Paragraph 79 of the National Park circular provides the principal basis for all affordable housing in National Parks being protected in perpetuity.
4.1.4	Taking into account Dartmoor's housing needs, social rent is the delivery priority	Noted, addition made.
4.1.4	Consider suitability of Rent to Buy to meet Dartmoor's housing needs	Rent to Buy does not provide affordability in perpetuity and is not a suitable affordable housing tenure in the National Park. It may be useful to explore how Rent to Buy discounted from OMV in perpetuity could work in the National Park.
4.2	Further recognition of the work of Housing Associations to deliver housing in the National Park is needed, and the benefits of their early engagement explained.	Agreed, additional paragraphs at 4.2.5 and 4.2.6 have been added to explain the benefits of working with rural providers early in the development process.
4.2.2	Review if affordability should be 25 or 30% of gross household income	Agreed, change made. 30% is the level of private rental affordability measured by ONS.
4.4.4	When shared ownership properties are permitted to staircase explore protecting the local tie.	Waiving of restricted staircasing on shared ownership homes is a Homes England process. Where shared ownership homes are permitted as part of a planning application, the s106 also restricts these to 80% staircasing and we would not support these being amended. In exceptional cases DNPA have supported waiving the restricted staircasing requirement on sites being delivered as 100% affordable housing, and where these units would otherwise have been delivered as open market units. Our policies do not allow for us to restrict open market units
4.4.4	Concern restricted staircasing is unworkable, raises costs for homeowners and doesn't allow RPs to finance against homes	Certain RPs do support delivery of shared ownership with restricted staircasing, recognising that this safeguards affordable housing in perpetuity and this is particularly important in rural areas where it is hard to replace. This is a Homes England policy and we do not believe there is the national or local policy framework to support removal of this

		requirement. We would welcome working with you further to understand how financing issues could be influenced in other ways.
4.5.9	Support for calculation of off-site contributions in lieu on an equivalence basis.	Noted.
4.7.6	Figure for financial contribution in lieu is too high.	The sum has been agreed on a number of applications already. Although high, it rightly encourages on-site provision rather than off-site.
4.8.8	Clarify rounding up requirements.	Amendment added.
Section 5: Custom and Self-build Housing		
Whole	Concern local needs custom and self-build housing is not mortgageable as set out in Strategic Policy 3.6.	There is no evidence to suggest this housing tenure is not mortgageable, indeed it is less restrictive than DNPA's intermediate discount market sale tenure and Government's First Homes tenure.
5.2.3	Affordable CSB should be linked to exception site plot values	Agree, amendment made.
5.2.3	When assessing CSB applicants, assessment of need should not consider ability to rent and defined by local area of need.	Agree, amendment made.
Section 6: Gypsy and Traveller Accommodation		
6.2.1	GTAA review does not include Dartmoor	Noted, reference to this removed.
6.3.2	Reference policy conflict between housing development on brownfield sites in flood zone 3a and b.	Policy 3.11 part 3d) provides necessary clarity on this issue.
Section 7: Rural Workers Housing		
7.1.8	SPD should not state 'small-scale enterprises are therefore less likely to be able to justify an essential need...' Examples provided that relatively smaller incidents have higher relative impact on smaller enterprises.	Agreed, reference to small-scale is not sufficiently defined and inappropriate. Sentence removed.
7.1.13	Application of minimum or living wage thresholds when assessing profitability should not be applied rigidly. Assessments should be focused on the financial needs of the applicants. Evidence provided of appeal decisions with Inspectors taking a broader view on assessing profitability.	Agreed, amendment added that minimum wage should be a starting point in assessing profitability and that evidence of on-site activity reducing workers financial requirement can be taken into account when assessing profitability.
7.1.13	Minimum wage thresholds should be supplemented with a requirement for a return on capital investments, to ensure businesses are viable as a going concern and can be resilient into the future.	Agreed, amendment added that a return is to be encouraged.
Section 8: Determining eligibility for different housing types		
8.2.1	Employment connection should be permanent.	This paragraph quotes the local connection criteria in the Local Plan. It is considered requiring employment to be permanent would be overly

		restrictive, particularly considering Dartmoor's high occurrence of self-employment and increasing reliance on temporary contracts.
8.2.2	Consider allowing eligibility to all adjacent parishes, not just those substantially within the National Park.	This is Local Plan policy and cannot be amended in the SPD. Its purpose is to ensure development in the National Park is focussed on meeting Local Needs.
8.2.4	Should refer to evidence, not demonstrate	Part agreed, change made.
8.2.5	Should refer to evidence, not demonstrate	Agreed, change made.
8.2.6	Two week advertisement period not workable for Housing Associations on re-lets.	Noted, re-let advertisement period reduced to 1 week.
8.2.6	Consider allowing intermediate shared ownership properties to cascade to Devon to avoid unnecessary vacancies.	The cascade of for sale housing is restricted to the National Park to ensure that housing delivery in the National Park is focussed on meeting local needs, consistent with national and local policy.
8.3	Support for definition of Housing Need including a defined portion of Band E	Noted
Section 9: General Housing Principles		
9.2.3	Acknowledge that housing associations have successfully worked in partnership with CLTs to deliver substantial affordable housing across the South West.	Noted, additional text and example provided at 9.2.4.
9.3	Housing Associations are struggling to deliver unit size restrictions and M4(2) standards.	Maximum dwelling size standards and the requirement for M4(2) standards is part of Local Plan policy (Strategic Policy 3.2) and this SPD cannot alter that policy. Viability evidence at plan-making stage does demonstrate that M4(2) standards are achievable in principle. Part 3 of that policy does allow flexibility for M4(2) where it is not desirable or possible for planning or environmental reasons, or it is not viable. A footnote has been added to Table 9.1 to clarify this.
Section 10: Community Engagement		
10.1.2	Community consultation should be good quality and take into account the full range of community views. This can assist manage community expectations regarding new development.	Noted, addition made
Section 11: Rural Exception Sites		
11.1.2	Clarify equivalent public grant.	Amendment added.
11.2.2	Requirement to demonstrate public grant is not possible where cross-subsidy is being pursued on an exception site should be stronger.	Agreed, change made.
11.2.5	Concern community infrastructure provision will reduce affordable housing delivery.	The policy provides thresholds for affordable housing delivery to ensure development still brings forward meaningful delivery. The policy

		approach allows other development priorities to be met in small communities.
11.2.5	Clarity sought on proposed control mechanisms and which will be used.	The appropriate control will be decided relative to the particular case. Wording clarified.
Section 12: Development Viability		
12.1	Concern that Vacant Building Credit can be used to disproportionately reduce the provision of affordable housing.	Concern noted, unfortunately VBC is a national policy and cannot be controlled or withdrawn by local policy.
12.1.8	Clarity required on who is paying for review of viability assessments.	12.1.8 states the review is to be carried out at the applicant's cost.