

Dartmoor Local Plan 2018-2036

Matter 4 – Housing

Prepared on behalf of Cavanna Homes (South West)

Rep ID: 0013

Boyer is instructed by our client, Cavanna Homes (South West), to submit a Matter Statement in respect of Matter 4 ('Housing').

This Matter Statement should be read in conjunction with previous responses prepared by Boyer:

- Regulation 19 Submission; and
- Review of Housing Need

Issue 1 SP 3.1(2) Meeting housing need

Housing Needs

Q1. The PPG indicates that the standard methodology is not to be used to assess local housing need in National Parks and that the housing need figure should be identified using a locally determined method, using best available information on changes in households and local affordability levels. In this context was the methodology used to identify a housing need figure locally appropriate and justified by the evidence? Does that figure provide the basis for a positively prepared Plan?

1. Whilst it is acknowledged that as a National Park, the standard approach to assessing housing need cannot be used, the NPPF and NPPG require DNPA to provide robust evidence demonstrating that they have considered both demographic trends and market signals.
2. However, we consider that from our review of the evidence base we are unable to determine the basis upon which the figure has been selected and what the implications and impact of the target selected will be. We therefore strongly question whether it is true assessment of housing need or as we believe an arbitrary number selected without any empirical basis or understanding of consequences. It cannot therefore, in the absence of evidence and testing be robustly concluded that the 65dpa target which is being proposed is sound.
3. Furthermore, DNPA state that this figure is not a target but represents the level of development that their evidence suggests is necessary to reduce identified problematic trends including high unaffordability, a reduction in the working age population, under occupancy of homes by older people, a greater demand for services for older people and a decreasing demand for services for younger people.
4. However, as our analysis within the Boyer – Review of Housing Need (0013) has clearly demonstrated there is no evidence provided to demonstrate that 65dpa will address the problems highlighted. We do not believe that the 65dpa target will be effective and it is in our view clear from the DNPA's evidence that a higher figure of 73dpa does not address the

demographic imbalance between economically active and inactive and the consequences this imbalance creates for local services and sustainable employment patterns.

Q2. Are the assumptions made in relation to migration, household formation and vacancy rates reasonable and justified by the evidence?

5. Issues relating to the above are addresses in the Boyer – Review of Housing Need (0013) representation.

Issue 2 Housing requirement/delivery

Q1. Is the indicative housing delivery figure of 1,125 dwellings over the Plan period (65 dwellings a year) justified by the evidence? Would it strike the right balance between addressing the socio-economic issues that the National Park faces, meeting identified local housing need and conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park? Would it help to meet the Plan’s Strategy and Vision?

6. As set out above in relation to Issue 1 SP 3.1(2) Meeting Housing Need Q1 and within our separate representation on Housing Need (Boyer – Review of Housing Need (0013), we consider that from our review of the evidence base we are unable to determine the basis upon which the figure has been selected. We continue to strongly question whether it is true assessment of housing need and in the absence of evidence and testing it cannot be robustly concluded that the 65dpa target which is being proposed is sound.
7. It is noted that the Local Plan (SD01) (paragraph 3.1.4) explains that the figure of 65 homes each year is “the level of development evidence suggests is necessary to reduce the trends identified above and provide sufficient housing to meet local housing needs.”
8. Paragraph 3.1.4 seeks to justify the 65 homes per year figure by explaining that this scale of growth will enable the delivery of affordable homes to meet local needs, allowing sufficient open market housing to cross-subsidise affordable housing delivery and “bring about a small increase in population intended to reduce the scale of demographic issues described above.”
9. However, the Local Plan is being advanced on the basis that it does not seek to put in place measures, through policy, that will respond sufficiently to address issues related to the demographic profile of the Park. Rather, it seeks only to bring about a “small” increase in the population to “reduce” the challenges associated with an ageing population.
10. It is apparent that the level of housing development/growth proposed over plan period does not appear to be sufficient to meet the National Park’s aims to reduce the challenges facing Dartmoor such as ageing population, local housing need and employment workforce.
11. Furthermore, and contrary to the assertions presented in the Local Plan (SD01), there is no evidence provided to demonstrate that 65 homes each year will address the issues identified.
12. Moreover, as noted within our previous representations the demographic evidence (Edge 2016) suggest that a housing figure of 73 homes each year would result in a decline in all households under 65 and does not address demographic imbalance between economically active and inactive persons. If this is the case then it is not credible to assert that the evidence bases supports the housing figure of 65 dwellings each year.

13. Consequently, a housing figure more closely aligned with the 80 dwellings per annum, as a minimum, is likely to be necessary to provide a positive and meaningful response to the socio-economic and population profile challenges present within the National Park.