



Dartmoor Local Plan 2018 - 2036

Matter 4 – Housing

Mr Edward Heynes, Heynes Planning Ltd

For Mr and Mrs Gorvin

Respondent No: 0015

- 1.1 Representations have been made by Heynes Planning on behalf of our Clients, Ken and Melanie Gorvin, in relation to the Regulation 19 version of the draft Dartmoor Local Plan 2018 – 2036 (LP) and earlier versions. Our representations dated 1st November 2019 confirm firstly, our Clients land interest in Yelverton; secondly, when various submissions have been made on behalf of our Clients; and thirdly, planning matters surrounding the Regulation 19 version of the draft LP itself.
- 1.2 The content of the submissions as set out above are relied upon in terms of evidence for the hearing sessions that we have been invited to on behalf of our Clients. That said, it is supplemented with additional material i.e. this paper, as a direct response to the matters and issues for consideration as set out in document ED11.
- 1.3 This paper deals specifically with Matter 4 - Housing. Specifically, it deals with the Inspectors questions raised under Issue 2, questions 1 and 2 although the comments made may stray into matters/issues covered by other questions. In addition to our own evidence, we anticipate the Authority (and other interested parties) producing evidence to address all questions and we will comment on that evidence at the hearing session as appropriate.
- 1.4 In preparing this paper we have relied on i) the evidence base as contained on Dartmoor National Planning Authority's (DNPA) website and ii) Government policy/guidance e.g. NPPF and PPG with references provided accordingly.

2.0 Inspectors Questions and Answers

Matter 4, Issue 2

Question 1 - 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?

- 2.1 In our representation dated 1st November 2019, we expressed concern regarding the amount of housing proposed over the Plan period and how that figure has been arrived at. Section 5.2 of Topic Paper 6, Housing (the version available at the time the draft LP was consulted upon) at the Regulation 19 stage, dealt with the 'Proposed Housing Number'. The current version of the Paper (SD106) states at para. 5.2.1, that DNPA should establish what level of housing it expects to deliver in the LP. This figure, it suggests, should be 'indicative' as opposed to being a 'housing target'.

- 2.2 It sets out at para. 5.2.3 a) the current Plan figure (Core Strategy) which is 50 dpa which was reflected in evidence associated with the now defunct RSS. This amount of development has proven to be deliverable. However, the Paper points out that if this rate of delivery is maintained in the emerging LP then various socio economic issues arise, particularly an imbalance in the age profile of the Park.
- 2.3 The Paper then examines other different projected scenarios which have resulted from the analysis as set out in Section 4 of the Paper relating to housing need and supply. At para. 5.4.9 an indicative figure of 65 dwellings per year to be delivered within the Park is identified. However, as set out in our previous representations, the evidence is not clear in the Topic Paper or elsewhere as to exactly how the final figure of 65dpa has been arrived at. It appears that ‘scenarios’ were put to Members ranging between 50 and 80 dpa (as set out at para. 5.3.1.2). These reflect the work undertaken by Three Dragons on behalf of the Authority but, notwithstanding the recognition of what this figure provides as set out in para. 5.3.3, why did Members choose 65 dpa instead of other scenarios? This is an important point as the Authority has not chosen not to include the evidence i.e. Committee/Member meeting papers as part of the evidence base to support the draft LP.
- 2.4 The Authority has clearly recognised the fact that the evidence to support the 65dpa figure in the draft LP at the Regulation 19 stage was not clear as a supplementary Technical Analysis Report (SD136) regarding housing need has been prepared. Although undated, it states on the Authority’s website containing the evidence supporting the production of the LP that it is September 2020.
- 2.5 We have examined the Technical Report in the context of the Topic Paper but consider it is still unclear as to why 65 dpa was chosen as an indicative housing figure. We understand the emphasis in the draft LP is to deliver housing that meets local needs and that unrestricted open market housing should be limited. The need to conserve and enhance the landscape and scenic beauty is also necessary and this is set out in Government planning policy/guidance.
- 2.6 It is clear that 50 units dpa is a figure that is not going to create an environment within which there are activity communities and there is therefore no need to evaluate that option. An indicative requirement of 65dpa is identified in the Technical Paper as being appropriate where land availability is concerned. This is noted but in our view, we question whether that figure is wholly appropriate if there is an opportunity to provide and deliver housing by taking a more **positive** and **proactive** approach to housing delivery noting the special characteristics of the Park and the need to obtain sustainable patterns of development.
- 2.7 We note reference to the fact that 65dpa has been tested in terms of impact on the Park but what about testing of higher levels of housing? What makes a higher rate such as 70 – 80 dpa so unacceptable? Even at 65dpa, the Technical Paper acknowledges that it only ‘moderately’ corrects Dartmoor’s falling and ageing population which has been a key matter of concern in understanding the correct amount of housing required over the Plan period.
- 2.8 We consider that a proactive approach is required because of two fundamental reasons. First, there is evidence of under delivery regarding the provision of affordable housing over the lifetime of the Core Strategy. That is recognised in both Topic Paper 6 and the Technical Paper (SD136) confirms a backlog of 171 units. In our view and from own experience, it is on allocated sites where affordable housing is most often delivered. The emerging LP has the opportunity to address this under delivery. The backlog is to be addressed in the first six years of the Plan but does the draft LP cater for a situation of under delivery after that which may well occur based on past rates of delivery.
- 2.9 Reading Table 6 of Topic Paper 6 (P.40), and in respect of completions, 497 units have been delivered, 42% (rounded up) of which are affordable. The Technical Paper states that a lower figure of 40% of housing delivered over the life of the Core Strategy has been affordable. The

Authority expect an increase in the rate of delivery (45%) across all sites but the evidence suggests this may not be achievable under the proposed strategy in the draft LP which is identical to the strategy in the adopted Core Strategy where 60% of housing is to be directed to Local Centres. The potential way of dealing with is to i) increase the amount of housing to be delivered throughout the Park and the allocated sites in particular or more housing needs to be the subject of allocated sites where, in our view, the majority of affordable housing will be delivered. Both scenarios are acceptable if housing delivery can also lead to other positive outcomes with respect to addressing existing socio-economic issues and reversing current trends.

- 2.10 As stated earlier, there is full recognition of the need to protect the Park but there a number of sizeable settlements around the periphery of the Park which could, in our view, accommodate housing without there being an adverse impact on either the settlement itself and/or the special qualities of the Park. It would also sit comfortably with the draft LP's Strategy and Vision.
- 2.11 An additional point to make is as far as the Exeter HMA is concerned, paragraph 5.4.6 of Topic Paper 6 states that *"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 Inspector will be aware that progression on the GESP has ceased – how does that impact on the housing number?

Question 2 – Would the Plan's approach to include an indicative housing delivery figure SP3.1(2), rather than a housing requirement, be justified by the evidence?

- 2.12 Topic Paper 6 examines the issue of identifying an indicative amount of housing as opposed to a housing requirement. Our comments are that i) a housing requirement figure is required as the development industry requires certainty regarding delivery in order to make commercial decisions. This is important as a substantial amount of housing including, importantly, affordable housing, is to be provided on allocated sites; ii) an indicative figure suggests that housing can be delivered above and below the figure established in the draft LP. A lower figure could be established over time through local decision making and would be unacceptable as it allows for potential for under delivery.
- 2.13 Importantly, the three LPA's whose administrative areas are covered by the Plymouth and SW Joint Local Plan have stated that there should indeed for a stated housing requirement as part of the draft LP. Paras. 5.4.4 and 5.4.5 of Topic Paper 6 refer to this. This allows for confirmation that the 'Dartmoor Allowance' is being delivered and that it would also allow for monitoring housing delivery and 5 year supply/trajectories. We support their view in this respect.