

Dartmoor Local Plan 2018-2036

Matter 9 – Site Allocations

Prepared on behalf of Cavanna Homes (South West)

Rep ID: 0013

Boyer is instructed by our client, Cavanna Homes (South West), to submit a Matters Statement in respect of Matter 9 ('Site Allocations').

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

- Regulation 19 Submission (Oct 2019); and
- Review of Housing Need (Oct 2019).

Issue 1 Methodology and application

Q1. How have the proposed allocations been identified?

1. Concern is raised in relation to the proposed allocations assessment as it lacks consistency and coherence. The evidence base presents contradictory statements on alleged impact, specifically in terms of the landscape and character of the settlement for Moretonhampstead.
2. For one site to be sequentially preferable other another there should be a clear evidence trail, based on a fair and comparable assessment to demonstrate why this is the case. Such evidence does not exist.
3. Reference to Cavanna Homes Courtenay Park site not progressing because other sequentially preferable sites (in terms of landscape/heritage impacts) are available is not supported by any evidence to justify why this is the case. Moreover, given the inconsistent and contradictory conclusions on the perceived impacts arising from Courtenay Park on matters related to landscape and heritage, it is difficult to determine what conclusions have been applied when making the conclusion that other sites are sequentially preferable.
4. Moreover, it appears that local opposition, or even support, of a site, has taken precedence over the objective assessment of site options. In the case of Courtenay Park, such opposition has proved to be the key driver in the decision-making process, resulting in the reasons given for not progressing the site. This does not reflect findings set out in the evidence base and undermines the process by which allocations have been identified.
5. Such an approach cannot be considered sound as the site selection process is contradictory and inconsistent, and applied inappropriately and also heavily influenced by local objection.

Q4. How were the site boundaries, areas and dwelling/other capacities determined? Are the assumptions justified and based on available evidence?

6. With regard to dwelling capacity it is important to highlight the inconsistency regarding the estimated dwelling numbers proposed by the Moretonhampstead allocations 7.12 Land at Thompson's Haulage Depot, Moretonhampstead and 7.11 Land at Forder Farm, Moretonhampstead and their respective planning consents.

7. Concern is raised in regard to the disconnect between the policy requirements and the reality of what is proposed/approved on an identified development site and the implications this can have on the actual overall numbers proposed.

Q5. How would the proposed allocations provide flexibility in the event that some sites do not come forward?

8. In regards to Moretonhampstead, it is clear that there has been no significant housing development in recent years. Whilst the retained Local Plan allocations at 7.12 Land at Thompson's Haulage Depot, Moretonhampstead and 7.11 Land at Forder Farm, Moretonhampstead now have planning permissions (planning consent 0588/19 and planning consent 0228/18 respectively) there had been non-delivery over a period of 5 – 7 years. These allocation sites have only recently been granted approval.
9. However, notwithstanding the lack of delivery in the town, it must be noted that that new housing is only to come forward in Moretonhampstead based on delivering affordable housing even though there is no up-to-date local housing need assessment. Furthermore, one of the allocated sites (7.12 Land at Thompson's Haulage Depot, Moretonhampstead) is not going to provide any provision due to Vacant Building Credit.
10. Considering the significant delay in the allocations having come forward and that both now have planning consent, these sites should be seen as commitments, allowing a wider range of allocations within Moretonhampstead to provide the needed growth over the plan period.

Issue 2 Site allocations (all)

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?

11. In specific regard to Moretonhampstead and affordable housing requirements the most recent Moretonhampstead Settlement Profile 2019 (SD196) states that: '*Moretonhampstead's affordable housing needs will be identified from housing need within the following parishes: Moretonhampstead, Bidford, Chagford, Drewsteignton, Dunsford, Lustleigh, and North Bovey.*'
12. Despite the recent update of the Moretonhampstead Settlement Profile 2019 (SD196) it continues to set out at Page 5 that the January 2014 Housing Needs Assessment recommends that 13 affordable homes are needed.
13. Irrespective of the 2019 version there is clearly still a lack of an up to date assessment of housing need for Moretonhampstead, which is of significant concern. The date of the assessment referenced in the Settlement Profile (i.e. 2014) needs to be considered in the context of paragraph 3.1.10 of the Local Plan (SD01), where it states: '*Housing needs assessments are surveys undertaken in communities which establish the level of current and future housing need. They are a vital tool for understanding a community's housing need, and offer far more detailed information about a community than the Housing Register.*'
14. Furthermore, it states: '*Housing needs assessments are typically valid for around 3-5yrs and they may be supported by information from the Housing Register. Where a development has taken place since a survey was carried out, this will normally mean that the housing needs assessment's results are less meaningful.*'

15. Considering that paragraph 3.1.4 of the Local Plan (SD01) confirms that the primary objective of the housing policies is to deliver affordable housing, there is concern that the retained allocation at 'Thompsons' (7.12) will **not provide** for any affordable homes owing to the Vacant Building Credit (confirmed with the recently approved application 0588/19). Consequently, the policy requirements related to this allocation are inconsistent with the reality of the proposals currently before the Park Authority.
16. Whilst the other proposed allocations will provide affordable housing, equating to 8-9 dwellings for 7.10 Land at Betton Way, Moretonhampstead and 11-12 dwellings for 7.11 Land at Forder Farm, Moretonhampstead, (though this is likely to be 13-15 dwellings in accordance with planning consent 0228/18), there is no correlation between the requirements of these site allocation policies to deliver affordable housing totalling c.24-27 dwellings and up-to-date evidence of need.
17. Consequently such a figure is at odds with the referenced need in the Moretonhampstead Settlement Profile, a figure of 13 affordable units which dates back to a Housing Needs Survey published in 2014. Therefore, due to the lack of an up-to-date, robust evidence base, the level of affordable housing required in Moretonhampstead is not quantified and therefore it is not possible to determine what scale of development is required over the plan period to ensure affordable housing need can be delivered.

Q5. *Would the detailed wording of each allocation be clear and effective?*

18. As identified there is clear inconsistency regarding the dwelling numbers proposed by the Moretonhampstead allocations 7.12 Land at Thompson's Haulage Depot, Moretonhampstead and 7.11 Land at Forder Farm, Moretonhampstead. Furthermore, there is no requirement for affordable housing at 7.12 Land at Thompson's Haulage Depot, Moretonhampstead, as confirmed with the recently approved application 0588/19. This again demonstrates once again a disconnect between the policy requirements and the reality of what is proposed/approved on an identified development site.