

ED35: Additional Paper – Delivery of JLP housing allowance

04 March 2021

1. The Duty to Cooperate statement states at paragraph 7.5.7:

‘The adopted Joint Local Plan (JLP) covers the city of Plymouth, and the areas of South Hams and West Devon which lie outside the National Park. The housing need for the HMA is met, largely through the JLP, but also taking into account an allowance of 600 dwellings over the JLP plan-period [2014 – 2034], which is expected to be delivered within the National Park. This figure was derived before the review of the Dartmoor Local Plan started, and is based upon the historic level of delivery within the South Hams and West Devon parts of the National Park.’

2. In Hearing 2 Matter 4 of the Dartmoor Local Plan 2018 – 2036 examination the Inspector requested further evidence to provide confidence that this allowance will be delivered by the Dartmoor Local Plan.
3. Given the 600 allowance is based on historic delivery and the Dartmoor Plan 2018 – 2036 seeks to increase delivery rates the Authority have confidence the allowance can be met. The below analysis of Table 11 – Forecast Local Plan Housing Trajectory 2019 - 2036 which sits within section 8 of the Housing Topic Paper [SD106] provides evidence to support this.
4. Table 1 apportiones the forecast delivery for allocated sites and windfalls to the JLP area, namely areas of South Hams and West Devon which are within the National Park. This apportionment has been completed for the 2019-2034 period recognising that the JLP plan period is 2014 – 2034, it should therefore be recognised that the exercise does not include delivery between 2014 and 2018 which would also be countable against the 600 allowance, making this a potential underestimate.
5. The apportionment from Table 11 of the Housing Topic Paper [SD106] has been estimated as follows:
 - a. Allocated sites – allocated sites within the JLP area which are expected to deliver¹ between 2019 and 2034
 - b. Windfall in Local Centres – 62.5% of the windfall forecast for Local Centres between 2019/20 and 2022/34 on the basis that 5 of 8 Local Centres fall within the JLP area
 - c. Windfall in Rural Settlements and Villages and Hamlets – 62.8% of the windfall forecast for Rural Settlements and Villages and Hamlets on the basis that 22 of 35 Rural Settlements and Villages and Hamlets fall within the JLP area
 - d. Windfall in the open countryside – 54.43% of the open countryside windfalls on the basis that the 2011 Census indicates 54.43% of the National Park’s households are located in the JLP area
6. Paragraph 6.1.8 of the Housing Topic Paper [SD106] states how windfalls have been calculated in accordance with the Housing and Economy Land Availability Assessment which was agreed in 2016 by Dartmoor National Park Authority and the GESP Authorities, East

¹ This has been calculated using the Housing and Economic Land Availability Assessment (HELAA) methodology – summarised in SD106 (Fig 7), consistent with calculations of 5 year land supply.

Devon District Council, Exeter City Council, Teignbridge District Council, and Mid Devon District Council.

7. It should also be recognised that the windfall projections project forwards existing policy and do not take into consideration proposed policy changes which will also work to influence delivery. As stated in paragraph 8.1.2 of the Housing Topic Paper this includes:
 - a. A change from a two-tier settlement strategy to three-tier, the new middle-tier has a lower affordable housing requirement which will likely increase delivery in the Rural Settlements, but not the Villages and Hamlets (there is no uplift in the estimate which takes account of this);
 - b. Sites are allocated for development in the Local Centres and Rural Settlements, the forecast yields are approximate (see Table 8) based on a standard methodology and actual yields may change after further site investigation;
 - c. A new local needs custom and self-build policy (SP3.2) allows single units to come forward without the need to provide affordable housing which may increase delivery of small infill sites across all settlements (there is no uplift in the estimate which takes this into account); and
 - d. An option to deliver the affordable housing requirement on small sites as a financial contribution-in-lieu rather than on-site will provide a flexible approach that may increase delivery in Local Centres and Rural Settlements.

Table 1 – Projected supply within JLP area (and Exeter Housing Market Area(HMA)) 2019-2034

	A: Allocated site projected delivery 2019 - 2034	B: Projected windfall in LCs 2019 - 2034	C: Projected windfall in Rural Settlements and Villages and Hamlets 2019 - 2034	D: Projected windfall in Open Countryside 2019 - 2034	Total projected supply in JLP area 2019 – 2034 (A+B+C+D)
West Devon	298	117	48	35	498
South Hams	85	29	18	22	154
Teignbridge	208	88	36	47	379
Mid Devon	0	0	3	0	3
Total	591	234	105	104	-
Total in JLP area	383	146	66	57	652