



# Hearing Statement on behalf of Wainhomes (South West) Ltd

In relation to: Matter 4 – Housing

for Wainhomes (South West) Ltd

Emery Planning project number: 17-040

Project : 17-040  
Hearing : Matter 4 – Housing  
Client : Wainhomes (South West)  
Ltd  
Date : February 2021

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## 1. Introduction

1.1 Emery Planning is instructed by Wainhomes (South West) Ltd (hereafter referred to as "Wainhomes") to attend the Dartmoor Local Plan examination. This hearing statement sets out our response to the Inspector's Matters, Issues and Questions in relation to Matter 4 – Housing. It should be read in conjunction with our detailed representations to the Submission Version of the plan, and our other Hearing Statements submitted to this examination.

## 2. Issue 1: SP 3.1(2) Meeting housing need

**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?**

- 2.1 Topic Paper 6 (Housing) sets out numerous different methods and results. Appendix 2 identifies that housing growth as a proportionate share of West Devon, Teignbridge and South Hams figures derived from the Government's standard method for assessing local housing need would result in a figure of 191 dwellings per annum. The Topic Paper also provides some figures produced by Edge Analytics, based upon the 2014 SNPP with a market signals uplift. These range from 80-95 dwellings per annum.
- 2.2 In terms of affordable housing need, the 2013 SHMNA identified a net annual need for 83 affordable houses per annum in Dartmoor. Subsequent assessments indicate that the need remains extremely high, and the existing shortfall alone is very significant<sup>1</sup>.
- 2.3 The chosen figure of 65 dwellings per annum does not follow a specific local housing need figure, and Topic Paper 6 does not appear to endorse any one figure over others. In our view the proposed housing figure falls significantly below housing need, in terms of population growth and affordable housing. However, the key to establishing the requirement in this plan is the balance

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<sup>1</sup> Housing Topic Paper, Appendix 1, page 97

between various social and demographic issues, and the impact upon the National Park. We therefore discuss the requirement in this context in our response to Issue 2, question 1.

### 3. 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?**

3.1 No.

3.2 The proposed indicative housing delivery figure of 65 dwellings per annum is not significantly different from the figure in the current adopted Local Plan, which is 50 dwellings per annum. The level of delivery achieved through the existing Local Plan has only perpetuated the adverse social and economic issues to which the NPA claims to be addressing through the Local Plan Review. Paragraph 3.1.2 of the draft plan specifically identifies the following adverse trends, which have been experienced in the context of the adopted Local Plan (and preceding that a figure of 60 dwellings per annum in the Devon Structure Plan):

- High housing unaffordability making it difficult for local people and workers to live locally
- A reduction in the working age population, making it increasingly difficult for local businesses to recruit and retain staff, and reducing the sustainability of communities and local services
- Continued or increasing under-occupancy of homes by older people or individuals, which runs at odds with the aim of making the best use of the housing stock
- A greater demand for services and facilities to meet the needs of older people, some of which may be difficult to deliver in deeply rural areas (for example home care)
- A decreasing demand for services and facilities for younger people, including schools, making them increasingly difficult to sustain in smaller communities

- 3.3 It is therefore clear that a step change in deliver is required in order to halt, let alone reverse, these adverse trends.
- 3.4 Crucially, affordable housing delivery should remain a key objective in the National Park. However, it is apparent that affordable housing needs are not currently being met. Table 6 of the Housing Topic Paper suggests that affordable housing delivery over the past 11 years has been just 17 per annum. Furthermore, the Issues consultation document (October 2016, page 12) specifically acknowledged that funding to deliver affordable housing does not exist in the same way it used to, and this is also detailed within the Housing Topic Paper at paragraph 2.6.2. There is clear justification in Dartmoor for establishing a housing requirement and identifying deliverable and viable sites which can cross-subsidise and meet the need for affordable housing.
- 3.5 Affordable housing need is extremely high. Every effort should be made to address this as soon as possible. There are available sites such as our client's at Noland Park which can contribute to meeting this requirement at least in part, with minimal environmental impact. A higher indicative housing figure could be pursued without resorting to the development of unsuitable sites which would have a significant harmful impact on the National Park.
- 3.6 We therefore consider that 65 dwellings per annum is not ambitious enough, and would make very little impact on addressing the key social issues affecting the National Park around retaining young people of working age, helping older people downsize and live independently for longer, and meeting the needs of farmers, farm workers, and other rural business. There are sites available which could fulfil these objectives in a sustainable way.

**Q2. 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?**

- 3.7 No.
- 3.8 We recognise that the National Park is not obliged to have a housing requirement in the Local Plan. However, where there are opportunities to meet development needs within the National Park without significant harm to it, those opportunities should be taken. Our client has put forward one such opportunity in South Brent (we refer to our Regulation 19 representations).

3.9 Furthermore, Dartmoor has committed to delivering a significant quantum of development which will contribute to meeting the requirement established in the Plymouth and South West Devon Joint Local Plan (adopted in March 2019). Plymouth City Council, West Devon Borough Council and South Hams District Council have objected to this plan as they (quite rightly) believe that the housing figure must be expressed as a requirement. Much greater certainty should be provided in relation to a housing trajectory and monitoring of the 5-year housing land supply.

**Q3. Has the scale and distribution of site allocations and other means of housing supply been informed by the level of need for the relevant HMAs identified in their respective SHMAs?**

3.10 No.

3.11 The Plymouth and South West Devon Joint Local Plan (adopted in March 2019) expressly relies upon a contribution of 600 dwellings from the National Park for the period 2014 to 2034. There is therefore a need and a commitment to deliver 600 dwellings within the parts of the National Park that fall within South Hams and West Devon, between 2014 and 2034.

3.12 It is also important to note that a significant area of the National Park falls within Teignbridge (i.e. outside of the Plymouth and South West Devon Joint Local Plan area), including the Local Service Centres of Ashburton, Buckfastleigh and Moretonhampstead. Housing needs relating to the Exeter HMA (i.e. the part of the National Park that falls within Teignbridge) are additional to the 600 houses to be delivered within the Plymouth and South West Devon Joint Local Plan area, and also need to be considered.

3.13 Therefore, the 600 dwellings between 2014 and 2034 is to be delivered only from the parts of the National Park that fall within South Hams and West Devon. Only 54% of past completions in the National Park over the past 10 years have been within South Hams and West Devon, and furthermore completion data since 2014 suggests that delivery in Dartmoor to date has been below the quantum anticipated in the Plymouth and South West Devon Joint Local Plan<sup>2</sup>.

3.14 Consequently, a commitment has been made and must be fulfilled through this plan to deliver 600 dwellings within the boundaries of West Devon and South Hams. The allocations must be sufficient and deliverable to meet the quantum of housing planned for. At present there is no

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<sup>2</sup> See Housing Topic Paper, Table 1 (page 15)

evidence to demonstrate how this will be achieved. In our view, the level of development within the National Park that falls within West Devon and South Hams must be increased to meet the requirement.

### **Q5. In light of proposed site allocations, is the lack of a housing trajectory justified?**

3.15 No.

3.16 Given the compelling social and economic reasons for identifying an indicative housing figure and site allocations, the plan should seek to ensure that the housing figure (which we say should be a requirement) will be delivered over the plan period. This is particularly important given that the NPA has committed to delivering a level of development that will contribute to meeting housing requirements established in other Local Plans, as made clear through the representations made by Plymouth City Council, West Devon Borough Council and South Hams District Council to the Regulation 18 and 19 stages.

3.17 In addition, we have significant concerns in relation to whether the identified supply is sufficient. In our view this would be confirmed by a realistic trajectory. We discuss this further in our response to Q7.

### **Q7. Would the housing strategy proposed provide for a five year housing land supply on adoption and maintained? (Please provide a simple table)**

3.18 We look forward to seeing the information on five-year housing land supply when presented by the Council. Notwithstanding, from the evidence base provided to date we have significant concerns as to whether a sufficient supply will be maintained, and therefore the housing figure met, over the plan period.

3.19 The plan period was extended from 2033 in the First Draft consultation (published in 2018) to 2036 in the Submission Version. However, the housing land supply has not increased to meet the need arising from 3 additional years of the plan period. This is before the plan period is extended again to reflect the fact that it will not be adopted before April 2021 (we address the plan period under Matter 2).



- 3.20 Section 8 of Topic Paper 6 (Housing) provides the Council's position in relation to housing land supply. However, we have numerous concerns in relation to the position as summarised in Tables 9 and 10 of the Topic Paper.
- 3.21 Firstly, the plan period is 2018-2036. Table 10 erroneously identifies that the housing requirement for the period 2018-2021 is 50 dwellings per annum based upon the current Local Plan figure.
- 3.22 Secondly, the Table 10 provides no information on supply for the first 3 years of the plan period. The allocations are only added to the supply from 2021 onwards. It is also not clear how this correlates with Table 11 which shows that several allocations are expected to deliver between 2018 and 2021. The trajectory should be underpinned by a simple year by year table of sites / supply sources.
- 3.23 Thirdly, the Local Plan is heavily reliant upon a large windfall allowance. Although garden land and sites of over 20 dwellings have been excluded from the calculations, as far as we are aware affordable housing exception sites have been included. These are exceptions to policy that are only required if planning policy fails to deliver the quantum of affordable housing needed. They should not be included within the forward supply and should instead be viewed as additional to it.
- 3.24 Fourthly, and notwithstanding the issues identified above, Table 10 identifies a flexibility margin of only 131 dwellings. Against the total requirement of 1,170 dwellings (65 x 18), this would equate to a flexibility factor of just 11%, which we consider is inadequate, particularly as significant issues are identified for several sites within the supply. Table 11 of Topic Paper 6 identifies numerous significant issues concerning sites, such as topographical, flooding, infrastructure and market issues. Whilst the table assumes that these will be overcome, it is inevitable that some sites will slip.
- 3.25 We therefore propose that greater certainty and flexibility should be introduced into the housing land supply through the allocation of further sites, in order to provide a realistic prospect of meeting the overall housing figure. As set out above, we also consider that the housing figure should be expressed as a requirement.

## 4. Issue 3 Affordable Housing

### **Q4. Would the policies generally provide effective wording that encourages and enables delivery of affordable housing, without placing unnecessary restrictions that would frustrate delivery?**

- 4.1 We have set out our comments in relation to Part 4 of Policy 3.3(2), which provides for affordable housing exception sites in the Local Centres, in our Matter 2 hearing statement. We support the policy in principle, but we consider that the maximum amount of market housing to be allowed (if necessary to make the delivery of affordable housing viable) should be increased. Currently the maximum amount of market housing permitted is only 25%.