



**Dartmoor Local Plan 2018 - 2036**

**Matter 2 – Vision, spatial strategy and planning applications**

**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 1<sup>st</sup> 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 principally with Matter 2 – Vision, spatial strategy and planning applications. Specifically, it deals with the Inspectors questions raised under Issue 4, question 3 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 2, Issue 4**

**Question 3 - How was the figure of ‘around 60% of the indicative housing delivery figure of 65 dwellings per year’ in Local Centres arrived at? Is that figure justified by the evidence? Should a figure be included for the other settlement tiers? In the absence of an apportionment figure for each settlement would the Plan adequately meet identified need for example within West Devon and South Hams?**

- 2.1 In our representation dated 1<sup>st</sup> November 2019, we expressed concern that the figure identified for Local Centres is too low. We objected to the LP on this point. To understand why this is the case there is a need to examine the amount of housing proposed to be brought forward over the Plan period. That issue is to be dealt with under Matter 4, Housing and we therefore do not comment upon the amount of housing to be delivered over the Plan period here.

- 2.2 Once the amount of housing required has been established, the question that has to be asked is how is it to be delivered in the most effective way. Key factors affecting spatial distribution include balancing the environmental qualities of the Park with the need to deliver housing in the best way so as to ensure identified needs are met. There is also a requirement to deliver development in the most sustainable way. Therefore, the Authority must demonstrate exactly how the strategy for the distribution of development been established and it must be supported by the evidence.
- 2.3 Our principal concern regarding the current strategy in the draft LP is that i) it is not clear from the evidence as to why 60% of the annual requirement (65dpa) has been targeted to Local Centres; and ii) the evidence, in our view, actually points to the Local Centres being the most appropriate location for development and that they should accommodate in excess of the target identified in the draft LP.
- 2.4 The Councils Topic Paper 4, Vision and Spatial Strategy (SD104), sets out the strategy for the delivery of housing. Any strategy should meet the objectives as set out in paras. 3.3.1 and 2. A number of scenarios have been tested (including them being the subject of assessment including sustainability assessment). The final option (no. 3 – see para. 3.7) is the preferred strategy and is reflected in draft Strategic Policy 1.4 (2) Spatial Strategy. However, that option/strategy is not considered to be the most appropriate for a number of reasons.
- 2.5 The options tested to some extent reflect the strategy/policies of the existing Core Strategy and that is used as a starting point for testing a series of alternative options. However, given its age (the Core Strategy was adopted in 2008 - over 13 years ago) is this necessarily the best reference point for developing the strategy for the emerging LP? As set out in the NPPF/PPG and elsewhere, the priority now is to afford the Park significant protection and to ensure that any development, including policies relating to spatial distribution, have regard to its special qualities. There is therefore a need to balance the need for development with ensuring development is targeted towards the most appropriate locations. This is key.
- 2.6 The chosen option/policy in our view does not meet the objectives in para. 3.3.2 above and therefore conflicts with the evidence. The Local Centres clearly are the most appropriate locations for the majority of development. They have a range of existing services and facilities that can withstand and cater for a new influx of residents and, in our view, are the most appropriate locations for accommodating new development. In terms of their geographical spread, most of the Local Centres are generally situated around the periphery of the Park. Arguably, these are the least sensitive parts of the Park from the point of view of environmental/landscape impact. Indeed, some Centres, such as Yelverton, are in close proximity to major urban centres e.g. Plymouth. Therefore, in locational terms they have good accessibility by public transport to those services and facilities that do not exist in that particular Centre itself. In locational terms, clearly, they are the starting point for accommodating the majority of development.
- 2.7 The strategy acknowledges the importance of the Centres and given their high sustainability credentials the questions must be asked – i) what would be a suitable level of development recognising their ability to be a focal point for new housing in particular; ii) from a capacity exercise is there any reason why more development should not be accommodated; and iii) on what basis should the other settlements in the proposed hierarchy accommodate new development given their scale, character, access to services and facilities and their ability to contribute to National Park objectives. In our view in addressing points i) and ii) alone, they should accommodate well over 60% of the housing proposed.
- 2.8 On point 1, Topic Paper 6, Housing (SD106) indicates that 69% of housing between 2007/08 and 2018/19 has been delivered in Local Centres and 31% elsewhere. Clearly, despite the current anticipated levels of delivery in the LP (60% in the Local Centres and 40% elsewhere) a combination of factors has led to a focus for development being directed to the Local

Centres. That being the case, then it would be inappropriate to reduce that figure particularly noting that i) historically the Local Centres have been the focus for development and ii) there is a need now, more than ever, to ensure that development is highly sustainable and that it recognises the qualities of the Park.

- 2.9 Regarding capacity, we recognise the fact that the settlements throughout the Park have been examined in respect of their ability to accommodate further development e.g. level of services and facilities, environmental constraints etc. However, as far as the Local Centres are concerned, we are not aware of any suggestion that with the allocated sites developed, they have reached their capacity and cannot accommodate additional development?. As stated in our paper prepared in respect of Matter 3, we are suggesting the amount of housing to be delivered throughout the Plan period should be increased and/or there should be a greater amount of housing directed to the Local Centres.
- 2.10 The emphasis in the draft LP is to deliver housing that meets the identified need and that unfettered unrestricted open market housing should be limited. That is understood but our experience regarding the delivery of affordable housing is that it is often best delivered where it forms part of a wider scheme that includes open market housing. That points to there being a need to ensure that for reasons of certainty of delivery, the majority of affordable housing ought to come forward as part of the allocations which will also include open market housing. If that is to be the case, more housing and most specifically, more allocations should be provided in Local Centres.
- 2.11 Indeed, there is justification for the approach in para. 2.10 above, as the Authority acknowledge there has been an under delivery of affordable housing over the past ten years. As stated in our Paper for Matter 3, Housing, that is recognised in both Topic Paper 6 and the Technical Paper (SD136) which confirms a backlog of 171 units.
- 2.12 Any settlements, in our view, should have a reasonable level/degree of services and facilities if they are going to be identified as being suitable for accommodating additional development. As stated above, we note the fact that draft Policy 1.4 (2) Spatial Strategy identifies two further tiers for the delivery of housing beyond the Local Centres. While there may be a justification for housing in these locations there needs to be certainty that such housing does i) not lead to an unacceptable impact on the Park; and ii) that it is sustainable.
- 2.13 Option 3, reflected in the draft Strategy/Policy, in our view leads to a dispersed approach that does not sit comfortably with National Park objectives and the strategy as set out in para. 3.2. There are locations identified for development, particularly the Villages and Hamlets (the tier at para. 3) that simply do not have a level of services and facilities that can reasonably support new development without there being a need to regularly travel to obtain goods and access services and facilities. We note the work done to establish which settlements have a level of services and facilities to support development (set out in the Topic Paper (SD104) and summarised in Appendices 1 and Appendix 2 ) but we consider that the evidence does not support development in some of the locations identified.
- 2.14 We note the constant reference to ‘opportunities’ for development. What are these ‘opportunities’? This needs to be clarified as it suggests that there is a presumption in favour of development being delivered when that should not be the case noting the strategy identified for the delivery of development in the Park both at a national and local level.
- 2.15 Regarding a figure for other settlements that should be needs driven, with evidence to back up the proposals being put forward. The Authority can then assess each proposal on a case by case basis. Neighbourhood Plans may also assist in provision.

HP/February 2021