



Hearing Statement on behalf of Wainhomes (South West) Ltd

In relation to: Matter 2 – Vision, Spatial Strategy and
Planning Applications

for Wainhomes (South West) Ltd

Emery Planning project number: 17-040

Project : 17-040
Hearing : Matter 2 – Vision, Spatial
Strategy and Planning
Applications
Client : Wainhomes (South West)
Ltd
Date : February 2021

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Contents:

1. Introduction	1
2. Issue 1: The Vision and other matters	1
3. Issue 4: Spatial Policies 1.4(2) and 3.3(2)	2

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 2 – Vision, Spatial Strategy and Planning Applications. 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: The Vision and other matters

Q2. What is the justification for the Plan period of 2018 to 2036? If the Plan were to be adopted after April 2021 would a modification be required in this regard?

2.1 Paragraph 22 of the NPPF states:

“Strategic policies should look ahead over a minimum 15 year period from adoption¹⁴, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.”

2.2 The requirement of national policy is therefore very clear. Footnote 14 provides only one exception, which relates to town centre development. The end date must therefore be extended.

The plan period should therefore be extended until at least 2038, to ensure that the plan would provide the minimum 15 year period provided it is adopted before 1 April 2023. This has implications for housing supply and allocations, and therefore other amendments will also be required.

3. Issue 4: Spatial Policies 1.4(2) and 3.3(2)

Q2. What methodology was employed to indicate the anticipated level of development for each tier of the settlement hierarchy? What factors were taken into account and is this robustly based?

3.1 Paragraph 77 of the NPPF states:

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”

3.2 Paragraph 78 states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

3.3 The above points are key. There needs to be an understanding of local needs. This is not limited to just housing need, it is also very important to look at service provision and how housing development can support this.

3.4 Topic Paper 4 (Vision and Spatial Strategy) does not discuss the proposed distribution. Section 5.5 of the Topic Paper 6 (Housing) appears to be the relevant section, but it does not provide any evidential basis for the distribution. Paragraph 5.5.2 simply notes current policy and completion rates. Paragraph 5.5.3 makes the following statement:

“The evidence suggests that current policy has successfully directed the right proportion of housing to the Local Centres. However the response to the Issues consultation was that a greater level of opportunity was sought in other smaller settlements which has not been met under the current strategy.”

3.5 It is not clear what evidence suggests that current distribution has been a success, or whether the representations referred to are valid. Critically, the evidence base fails to undertake any bottom-up assessment of need and opportunities as envisioned by the NPPF. Therefore, the proposed distribution is not justified by robust evidence and is not consistent with national policy.

Q3. 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?

Distribution to the Local Centres

- 3.6 As set out in our response to Question 2, there is no evidential basis for the figure of ‘around 60%’. It simply seems to be a continuation of a past approach. There has not been any bottom-up assessment as to the needs of particular settlements and their hinterlands.
- 3.7 In our view, the figure for Local Centres should be increased to provide the certainty of housing allocations in the most suitable and sustainable locations, with the least impact on the National Park. Topic Paper 2 notes that most housing need arises in these settlements. They represent the logical locations to plan for meeting housing and economic development needs in the National Park.
- 3.8 In terms of the distribution of development across the Local Centres, the plan does not set specific housing and employment figures for each settlement. We consider that the amount of development to be delivered in each Local Centre should be set out in the plan. It would then also be possible to relate the quantum of development proposed in this plan to the commitment made Dartmoor’s commitment through the Plymouth and South West Devon Joint Local Plan to deliver 600 dwellings within West Devon and South Hams (see our response to Policy 3.1 / Matter 4). The plan as drafted would not fulfil this commitment.
- 3.9 Notwithstanding the above, allocations are made in the Local Centres in Section 7 of the draft plan. The distribution between the Local Centres appears to be broadly equal. However, in determining the distribution of development, neither the plan nor the evidence considers housing need / local service vitality / environmental constraints / capacity to accommodate development in determining the distribution of development between the Local Centres.
- 3.10 The distribution should be based upon the capacity of specific settlements to accommodate development, particularly in terms of the impact on the National Park. Regard should be had to the availability of suitable sites to meet the need, which may be capable of addressing

affordable housing needs extending beyond the settlement in question. The capacity to accommodate development in some of the Local Centres is significantly higher than in others. On the basis we propose that South Brent accommodates a higher proportion of development than currently proposed. In addition to having very high levels of unmet housing need, there is suitable land within the settlement which could be developed with the least impact upon the National Park. We discuss South Brent in further detail below.

South Brent

- 3.11 South Brent is identified as a Local Centre alongside Ashburton, Buckfastleigh, Chagford, Horrabridge, Moretonhampstead, Princetown, and Yelverton. A broadly similar distribution is proposed between these settlements. In our view, a higher level of growth should be apportioned to South Brent.
- 3.12 There are significant affordable housing needs in the village and its hinterland. A previous needs assessment in 2009 identified a need for 28 affordable homes. That assessment underpinned the allocation of the site at Fairfield for residential development (ref: 7.16(2)). Revisions to the housing need assessment were undertaken in 2014, in advance of the Fairfield planning application (application reference: 0354/14). The update report concluded that there is a need to provide for 53 affordable homes for local people in housing need within South Brent over the 5 year period of 2014 to 2019. Topic Paper 9 (Development Sites) also identifies a need for 50 affordable homes within the village. There is a current need, therefore, for around 50 affordable homes in the village.
- 3.13 The committed Fairfield site (ref: 7.16(2)) will fall some way short of meeting local the affordable housing needs. Of the 40 dwellings consented under application 0354/14, only 14 were affordable. Therefore, there is a shortfall of affordable housing in the village of some 39 units at 2019, which is in addition to further need that will arise during the plan period. The draft allocations will also fall somewhat short of meeting the requirement over the next 5 years, let alone the plan period, across which additional need will inevitably arise. As noted above, the need for affordable housing has increased significantly since 2009.
- 3.14 New development at South Brent could also enable the delivery of other infrastructure via planning contributions and/or CIL. For example, there have been a number of previous proposals to re-open South Brent railway station. Indeed, land for the railway station and car park is allocated in the adopted Local Plan (Proposals SBR2 and SBR3) and is proposed to be retained

as an allocation in the Local Plan Review (Proposal 7.17(2)). However as far as we are aware the proposals do not benefit from funding. Clearly the level of any contribution would depend upon the scale of development allocated and the level of other required contributions, and external funding would almost certainly still be required. Nevertheless, the Local Plan Review presents the opportunity to identify sites to fund this significant opportunity.

- 3.15 Our client is promoting the land south of South Brent for residential development. We have put forward details of the site in our Regulation 19 representations. We consider that the site offers a deliverable option which could deliver much needed market and affordable housing, with negligible impact upon the National Park owing to the location and characteristics of the site. It would therefore be logical for South Brent to accommodate a higher proportion of development, on the basis that housing needs can be met in this location with minimal impact upon the National Park.

Affordable housing exception sites in the Local Centres

- 3.16 Paragraph 77 of the NPPF states:

“Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”

- 3.17 Part 4 of Policy 3.3(2) provides for affordable housing exception sites on the edge of Local Centres. The policy is supported in principle. However, in relation criterion a) of the policy, it is not clear what evidential basis there is for only allowing up to 25% of the development to comprise market housing. In contrast, the site allocations are proposed to deliver 55% market housing.
- 3.18 If a higher level of cross subsidy than 25% would enable the delivery of affordable housing to meet an identified need, and the site was suitable for development without significant impacts upon the National Park and complied with the remainder of the policy, then we see no reason to limit the amount of market housing to only 25% if a higher level (say 25-50%) was needed to make the development deliverable.
- 3.19 By only providing a very limited maximum amount of affordable housing the policy is effectively going to rule out most opportunities to deliver this type of site. Of note the Cornwall Local Plan: Strategic Policies (Policy 9) includes a rural exception policy with an allowance of up to 50%

market housing, and Wainhomes are regularly able to deliver affordable housing led development in Cornwall on that basis.

3.20 We therefore consider that a greater proportion of market housing should be allowed in Local Centres, where this can be demonstrated to be necessary to make a development viable. This would provide a greater degree of flexibility and scope to deliver affordable housing in areas of significant need. In our view 50% or 55% is a more appropriate balance where the mix can be clearly justified by viability evidence.