



Dartmoor Local Plan (2018 - 2036) Examination

ED23 DNPA Hearing Statement 9 Site Allocations

(PART 1 – Issue 1)

Whether the proposed housing, employment and mixed-use site allocations are justified, effective and consistent with national policy.

1 Issue 1 Methodology and application

Q1. How have the proposed allocations been identified?

- 1.1 Allocations were defined by a staged process which started with settlement-wide analysis, proceeded via site assessments and early public consultation on site options [SD28], consultation on the preferred sites within the Local Plan and culminated with the submission of the local plan. The first stage was to assess each settlement within Dartmoor in terms of its appropriate role within the settlement hierarchy. This gave a sustainable framework for decisions about meeting Dartmoor's housing need.
- 1.2 The Topic Paper 6 - Housing [SD106] describes how housing needs over the plan period were identified both overall and by settlement. From this work, there is a discussion at section 4.5 of the Vision and Settlement Strategy Topic Paper [SD104] which discusses how settlements were identified as suitable for allocated sites. Their ability to absorb appropriate levels of growth assessed as part of the spatial strategy Topic Paper 4 – Vision and Spatial Strategy [SD104] Appendix 1. This assessment balanced the benefits of meeting housing need in these places against their sensitivity to change, the special qualities of the National Park and the statutory purposes.
- 1.3 The Land Availability Assessment (LAA) Report 2017 [SD159] explains how available sites were sought and reviewed to produce a basket of potentially suitable and achievable sites which were within and adjacent to the Local Centres.
- 1.4 The next step was to examine the potential of these sites further in order to produce a list of sites appropriate for allocation. This is explained in more detail within Topic Paper 9 Development Sites [SD109]. In summary technical studies were used, together with professional judgement, to analyse the suitability of each site. These studies included:

- Landscape Character Assessment [SD113] / Sensitivity Assessment [SD114-117]
 - Strategic Environmental Appraisal/Sustainability Appraisal [SD04-SD13]
 - Strategic Flood Risk Assessment [SD120/SD121]
 - Habitat Regulation Assessment [SD77-SD89]
 - Open Space requirements [SD141]
 - Employment Land Review [SD148-SD150] and Infrastructure Delivery Plan [SD142]
- 1.5 The sites considered most suitable were included in the Regulation 18 draft Plan, with the reasons for the decisions made explained within the SA/SEA in accordance with the regulatory requirement. Following the Regulation 18 consultation a number of updates were made in response to comments from stakeholders in relation to:
- Technical evidence of the SEA/SFRA/HRA,
 - updated advice on planning for the South Hams SAC, and
 - updated advice from Development Management in relation to planning applications.
- 1.6 Having considered the comments two allocation policies for Mary Tavy were added. An employment land area at South Brent was removed, following updated flood risk mapping which made the site undeliverable.
- 1.7 Non-residential allocations have been made in response to safeguarding for infrastructure needs (Proposal 7.22 (2) Land off Warren Road, Mary Tavy and Proposal 7.17 (2) Land at Station Yard, South Brent) and business land needs assessments and opportunities (Proposal 7.8 (2) Land at Crannafords, Chagford).
- 1.8 Following the Regulation 19 consultation, representations were reviewed to determine if there were any overriding technical issues or objections which might warrant a change in allocations and/or site boundaries.

Q2. Do they accord with the Plan's spatial strategy as set out in SP1.4(2) in terms of the overall provision in Local Centres and Rural Settlements?

- 1.9 The spatial strategy focuses development at the National Park's eight Local Centres which are the largest and most sustainable settlements in the National Park and offer the greatest range of services (Topic Paper 4 – Vision and Spatial Strategy [SD104]). Development at these Local Centres should meet the needs of that settlement as well as a rural hinterland.
- 1.10 All but two of the proposed allocations are at the Local Centres. The two exceptions are both at Rural Settlements and are considered necessary to provide greater policy control in the delivery of substantial brownfield and infill opportunities as follows:
- Buckfast where the Axminster Carpets Spinning Mill site which presented a significant brownfield development opportunity within the settlement.

- Mary Tavy where a brownfield site within the settlement boundary presents a justified opportunity and a site adjacent to the settlement boundary for education safeguarding.

1.11 The Local Plan makes provision for windfall developments and opportunities to meet identified local need in all settlements, providing the opportunity for organic scale growth at Rural Settlements and those smaller locations further down the hierarchy. This is considered to be sufficient provision in these smaller places without the need for specific allocations.

Q3. _Would the Plan provide for a least 10% of the identified housing need to be provided for on sites no larger than one hectare?

1.12 Table 27 in SD109 [Topic Paper 9 Development Sites](#) lists the site size of allocated sites. 146 dwellings out of the 450 allocated (32%) are on sites of less than 1 hectare. This is also covered at 7.2 of SD106 [Topic Paper 6 Housing](#).

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

1.13 The site boundaries in general follow site ownership details though in some cases only a portion of the site area is allocated. The allocations which include only a portion of the area put forward have balanced the need to provide for proportionate housing growth but placing sensitive areas outside the development boundary generally following landscape or boundary features on the ground.

1.14 The starting place for site capacities was set out in the LAA report. These capacities were based on standard densities of 20 to 30 dwellings per hectare and fixed gross-to-net assumptions (see 6.11 from [SD159] Land Availability Assessment Report 2017). These were further refined by the LAA panel comprising a number of planning and development professionals. As per the agreed methodology, these residential development figures were presented as a minimum/maximum and midpoint figure.

1.15 Using these calculations as a starting point, approximate site yields have been determined by analysing the density of approved schemes of 7 or more units over the last plan period and using industry assumptions for site developable areas. The site allocations assessment work involved detailed site visits and considerations of site topography, site servicing, potential additional land take for eg, strategic green infrastructure, SUDS, or other requirements, and site-specific placemaking issues responding to design and delivery opportunities and constraints. The assumptions used to determine site yields is summarised below, further information is available at section 7.1 of the Housing Topic Paper.

- an average of 35 dwellings per hectare

- developable area of 100% for sites under 1Ha and 80% for sites of 1Ha or more; and
- in certain circumstances the HELAA recommended that site yields be limited because of site constraints and these recommendations have been used where relevant

1.16 The assumptions in relation to site constraints, and infrastructure requirements, are specifically set out in individual Allocated Site Briefs policy advice notes [SD175-SD191] and these have been incorporated into allocation policy text. The Site Briefs were provided to developers at the Regulation 19 stage and DNPA took any comments into consideration.

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

1.17 Several of the sites currently have permission or resolution to grant permission, subject to entering into a s106 agreement in relation to affordable housing and site specific requirements. This provides some certainty in delivery. The latest position on sites is set out in the Authority's Monitoring Report 2019/20.

1.18 There are a number of known potential windfall sites and the Housing Topic Paper includes evidence of ongoing windfall delivery (see section 8.1), primarily through conversions and change of use. There are a number of institutional buildings within the local centres and rural settlements and it can be anticipated that some of these will be targeted for conversion to residential during the plan period.

1.19 The former care home at Kenwyn in Ashburton is one such site which has capacity for around 15-20 dwellings. In addition, in Princetown there are four small brownfield/infill opportunities identified with capacity for 16 to 27 dwellings (see response to Inspector's question on Princetown in Matter 9 Part 2). Windfalls in Local Centres will provide headroom and flexibility ensuring adequate, and appropriate development can come forward.

1.20 To support delivery of the spatial framework – that is providing some affordable housing opportunities in each of the Local Centres – at least two allocations were made in each of the Local Centres, ensuring that if one site were to be delayed another source of housing for local needs is still in the pipeline. The exceptions to this are Chagford and Horrbridge which have had significant level of housing growth in recent years which makes sufficient provision for the local area for the coming years.

1.21 Two sites are allocated at Buckfastleigh. The Authority is concerned that the Holne Road site may be unable to deliver in a way that meets the Local Plan strategy and wider sustainable development requirements. On this basis it may be reasonable to consider

alternatives through modifications, to ensure a deliverable site is identified to meet local housing need.

- 1.22 There are some opportunities for windfalls highlighted in the 2018 Employment Land Review [SD148], but should this site not come forward having a reserve site allocation may be required.
- 1.23 A rural exception site policy operates throughout the National Park. Where housing need exists and evidence indicates it cannot be met within a settlement boundary, including in the event allocated sites are not deliverable, then a site for 100% affordable housing (with flexibility for up to 25% cross-subsidy if essential for viability) can come forward adjacent to a boundary. This allows flexibility to ensure housing needs are met in the event allocated sites do not come forward.
- 1.24 Finally, small scale rural and agricultural enterprise may come forward in accordance with policies in the local plan. This economic activity forms a key component of the national park's employment and such windfalls complement the employment and mixed-use allocations in the plan.