



Dartmoor Local Plan (2018 - 2036) Examination

ED26 DNPA Hearing Statement 11 Monitoring and whole plan viability

Whether the Plan would be viable and deliverable within the Plan period and whether the arrangements for monitoring would be robust and effective.

Issue 1 Viability

Q1. Would new development be able to accommodate the Plan's policy requirements, having regard to viability and is this supported by evidence in the whole Plan viability Assessment (SD90 and 91 and 90)?

- 1.1 The Whole Plan Viability Assessment [SD91], (October 2018) was undertaken in support of the draft Local Plan 2018-36 in line with contemporary costs, values and policy. The subsequent Whole Plan Viability Assessment Addendum [SD90] (September 2019) updated the earlier assessment to include policies later introduced or revised by the NPA; it also updated costs and values to current rates.
- 1.2 Importantly the studies identified 2 distinct value areas for the National Park in which all the typologies and other case studies were tested: North East and South West.
- 1.3 Both viability studies followed the relevant regulations and guidance and are in line with the National Planning Policy Framework 2019 and Planning Practice Guidance for Viability at September 2019. They were prepared in consultation with the development industry and take account of relevant policies in the publication draft Local Plan. In accordance with PPG (003 Reference ID: 10-003-20180724) both studies examined a set of residential typologies. General assumptions are summarised in chapter 2 and Annex I of [SD91], and, in chapter 1 and Annex II of [SD90].
- 1.4 Notes of the original consultation on which they are based can be found in Appendix II of the [SD91]. The consultation was undertaken with developers, landowners and agents at a stakeholder workshop and through subsequent follow-up discussion. Separate consultation with local estate agents was carried out to verify or sense check land and dwelling values. Individual interviews were also held with locally developing housing associations to inform affordable housing assumptions.
- 1.5 A full list of how all policies were considered can be found in [SD91] Annex III – additional policies were considered in the Addendum Report [SD90] and details of this can be found at paragraphs 1.4 and 1.5 as well

as figure 1.1 of [SD90]. Of particular note is that, as well as the Authority's policies on affordable housing described at Strategic Policy 3.3(1), 3.4(1) and 3.5(1) – see paragraph 2.23 of [SD91], the studies took account of

- Policy 4.5 (2) (and table 4.4): Electric Vehicle Charging which sets criteria for active and passive charging points;
- Policy 3.2(2): Size & Accessibility of New Housing which requires all new dwellings to reach Building Regulations Requirement M4(2) for accessible and adaptable dwellings, along with a proportion to M4(3) and for new dwellings to meet but significantly exceed national space standards;
- Policy 2.3 (2): Biodiversity Net Gain; development with the potential to impact on biodiversity will be required to contribute towards biodiversity enhancement; including 2.3 (2) 2 that development involving 2 homes, 100m² of non-residential floorspace or a site area of 0.2 Hectares, or more, will be required to deliver 10% biodiversity net gain;
- Policy 1.7 (2) Sustainable Construction; requires that “*All development proposals should minimise their impact on climate change by reducing carbon emissions further than required by Building Regulations, and improving their energy efficiency using a 'fabric-first' approach*”. (The Park Authority commissioned an expert study to advise on the costs of the different components of Strategic Policy 1.7. The report to DNPA is published separately [SD131] and the viability studies have adopted the component costs.)
- Policy 4.9 (2) 3 – requiring that the Authority will seek to ensure development within or outside the National Park which is likely to increase harmful recreational pressure on Dartmoor's Special Qualities, particularly biodiversity, cultural heritage and the access network, is appropriately mitigated.

1.6 The latter 2 bullet points were added to the viability testing in 2019 [SD90].

1.7 Costs & values are derived using a variety of sources of information, which combine public official sources with reputable trade databases and specific consultation work and are commensurate with PPG Paragraph: 012 Reference ID: 10-012-20180724. Full details of these can be found in chapter 2 and Annex I of SD 91, and, in chapter 1 and Annex II of [SD90].

1.8 The results of the viability testing for the 2018 study can be viewed in chapter 3 of SD91 which concludes that:

The viability appraisal findings demonstrate a viable and deliverable Plan so long as some flexibility is maintained, over affordable housing mix in particular. Where there is additional pressure on development from higher than usual costs, policy trade-off decisions may be required regarding the affordable housing levels and/or affordable tenure mix, in the South West of the National Park in particular. The option to deliver infill sites with up to 100% shared ownership homes or as local needs custom or self-build plots will assist in bringing these

sites forward without the need to increase unfettered open market housing. Para 4.14 (A full list of key findings and recommendations for policy can be found in chapter 4 of [SD91])

- 1.9 The results of the viability testing for the 2019 Addendum can be viewed in chapter 3 of SD90 which arrives at a similar conclusion:
- 1.10 *The viability testing undertaken in the Addendum Viability Assessment has demonstrated good general viability and, in most cases, ability to achieve a level of between 45% and 100% affordable housing, depending on site type and policy requirement. Results are weaker than found in the 2018 WPVA but overall the conclusions reached are still applicable. On some sites, flexibility regarding affordable tenures will be necessary for an economically deliverable scheme. The case studies have produced viable results in both value areas but there is less 'headroom' to deal with market fluctuations or additional cost in the South West compared to the North East. Para 3.32. (A full list of key findings can be found in the executive summary from paragraph 3. – including that Rural Exception Sites are viable with 25% market housing where the majority of units are intermediate affordable housing. (Paragraph 10 [SD90])*
- 1.11 Thus new development is generally able to accommodate the Plan's policy requirements, having regard to viability, and this is supported by the evidence presented in the Whole Plan Viability Assessments [SD90 and SD91].

Issue 2 Monitoring

Q1. Are the monitoring indicators specific and measurable?

- 2.1 The proposed monitoring indicators set out at Appendix A of the draft Local Plan are all specific and measurable. Every draft monitoring indicator sets out to analyse either the number or percentage change of a specific measure. For example, some draft indicators under Topic 3 - Housing include 'net homes approved and completed (3-year average)' and 'housing affordability ratio, average house price to average income'. Under Topic 2 – Environment draft indicators include 'SSSI's in favourable or unfavourable recovering condition (area and percent of total)' and 'Listed buildings, scheduled monuments and conservation areas at risk (number and percent of total)'.
- 2.2 Many of the proposed indicators in the draft Local Plan have been used for many years in producing the Annual Monitoring Report. These indicators have allowed the Authority to track the progress of indicators year-on-year throughout the lifetime of the current Local Plan. Examples can be seen in the latest AMR.
- 2.3 It could prove useful to produce indicative targets for certain indicators in order to create a benchmark against which success can be measured. A selection of possible indicative targets for the separate policy areas is detailed below.

Topic	Proposed indicative target/trend
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1 – Vision, Spatial Strategy and Planning Applications	Set housing distribution figures of approximately 60% in Local Centres, 25% in Rural Settlements, 10% in Villages and Hamlets and 5% in the open countryside.
2 - Environment	20% of SSSI's in 'favourable' recovering status An increase in net new biodiversity units provided, expressed as total, and by allocated sites (measured against baseline)
3 - Housing	3-year average of 65 net dwellings approved and completed annually 3-year average on allocated and windfall sites of 45% or net homes approved and delivered annually to be affordable homes Enough permissions granted to meet the local demand identified through the self-build register Housing Land Supply against 5-year total (+5%) Net housing delivery in each Housing Authority area of the National Park (and by Housing Market Area) in line with indicative HMA allowance (where applicable)
4 – Communities, Services and Infrastructure	A net increase in public open space and sports facilities (area). No net loss of community services in classified settlements
5 - Economy	A decrease in job seekers allowance claimant rate An increase in average income A net increase in employment floorspace (area) and tourist accommodation (area)
6 – Minerals, Waste and Energy	Net increase in renewable energy development approved (MW) annually
7 – Towns, Villages and Development Sites	Delivery of development on allocated sites in line with housing trajectory An increase the coverage of Neighbourhood Plans and community planning (Parish Plans)

Q2. Are appropriate mechanisms and timescales in place to undertake the required monitoring of the implementation and effectiveness of the Plan and to report on the full breadth of indicators within an Annual Monitoring Report?

- 2.4 The AMR in its current format reports on the yearly progress of various indicators that reflect the effectiveness of policies within the Local Plan. If trends are reported that are not in keeping with these policies further investigation is warranted. For example, the past three years have seen the lowest rates of approvals in Rural Settlements since 2008/09. In response, the draft local Plan proposes a new settlement hierarchy which includes Villages and Hamlets, to enable development in middle tier settlements that would otherwise not be permitted under current policies.
- 2.5 It may be appropriate to include the suggested targets and trends outlined above in Question 2 in the AMR as definitive 'trigger' points for review.
- 2.6 The Authority holds a Land Availability Database that details all new dwellings coming forward in the National Park and is updated quarterly. The database informs the indicators within the Housing section of the AMR. If indicative targets and trends were to be incorporated into the plan, this database would enable consistent monitoring of progress towards these targets. A similar database monitors employment floorspace.
- 2.7 For other indicators over which the Authority has less direct control, such as those relating to the Natural and Historic Environment, and where trends tend to become evident over a longer timescale, the Authority produces a State of the Park Report¹ at least every 5 years (as required in relation to its duties to prepare a National Park Management Plan). The indicators within the State of the Park report give a holistic picture of the National Park over the longer term, particularly in relation to habitat quality, landscape and tourism where trends are less evident on an annual basis. These contextual indicators enable a broader perspective of the success of more specific indicators included in Local Plan monitoring.
- 2.8 Topic Paper 10 – Monitoring and Governance [SD110] identifies a specific framework for both habitat monitoring (the Tamar estuary SAC) and housing delivery across the Housing Market Areas, with a clear statement of how the Authority should react in the event of specific monitoring outcomes.

¹ <https://www.yourdartmoor.org/delivering/measuring>

Q3. Do the monitoring indicators on housing allow delivery against annual targets and in terms of five-year supply to be effectively reported?

- 2.9 NPPG states 5-year land supply can be demonstrated through reporting the latest available evidence in the Authority's Monitoring Report (AMR) (Paragraph: 004 Reference ID: 68-004-20190722). For the adopted Plan this will be based upon the indicative housing delivering figure (and to date has been based on the Plan figure, in line with Paragraph: 005 Reference ID: 68-005-20190722).
- 2.10 An indicator would be appropriate under Appendix A (3 – Housing) "Availability of Land for Housing" expressed as a projected yield of new houses, which enables a 5-year housing land supply total shown against the indicative housing delivery figure. This would be reported in the AMR consistent with the methodology at NPPG (Paragraph: 007 Reference ID: 68-007-20190722).