

## **Plymouth and South Hams Joint Local Plan 2014 – 2034: Examination Statement on behalf of the Dartington Hall Trust**

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### **Matter 8 Policy Area Strategies: Thriving Towns and Villages**

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**Issue: Does the JLP provide a robust framework for the management and delivery of development across the Thriving Towns and Villages Policy Area (TTVPA) that is justified, effective and consistent with national policy?**

#### **1.0 Context**

- 1.1 The Dartington Hall Trust ('the DHT') has been promoting a number of sites for development through the Joint Local Plan ('the Plan') and has also made representations to the wording/requirements of a number of development management policies. The DHT also proposed the inclusion of a 'Dartington Campus Area Policy' but relevant provisions have not been included within the Plan.
- 1.2 The Inspectors will be aware that Historic England's response to the Plan raised particular concerns about the potential scale and extent of development envisaged by the proposed allocations at Dartington Hall (Higher Barton) and Foxhole relative to the heritage context. The DHT has, therefore, undertaken discussions with Historic England and South Hams District Council ('the Council') about how these concerns might be addressed. The preferred approach that has been proposed by the DHT, and which Historic England supports in principle, is to:
- 1 Remove the specific allocations at Dartington Hall (Higher Barton), Foxhole and Woodland's Yard from the Plan; and
  - 2 Put in place a policy framework that supports the role of the DHT and the Estate and recognises that the preparation of an Estate Framework may be able to demonstrate particular material considerations that justify development outside settlement boundaries, including the need for development to provide local jobs/amenities and to generate sufficient funds for operational/ capital investment and a sustainable income stream for re-investment in the context of wider funding proposals.
- 1.3 This approach has developed from the aspirations that were embodied in the DHT's proposed Dartington Campus Area Policy and reflect the outcome of more recent discussions with Historic England. Notably, Historic England agrees that there is a need for an Estate Framework policy to prevent a policy void that could prejudice the implementation of development on the Estate that will assist in ensuring the long term future of valuable heritage assets.
- 1.4 Appendix 1 explains the background to the suggested Estate Framework policy and includes draft Policy wording and Explanatory Text to demonstrate how it might work. The Inspectors should note that the wording of the policy has been shared with Historic England, and whilst they agree with the principle, it is subject to comments and amendment. The DHT will continue positive discussions with Historic England and the Council in advance of the Hearing Session with a view to reaching an agreed position that satisfactorily addresses all interests.

- 1.5 Appendix 2 explains the significant contribution that the Trust and the Estate make to the social and economic profile of the Plan area and beyond and outlines the operational challenges that the Trust is seeking to address through a range of measures. A 5 year plan has been developed and is being implemented with a view to raising significant investment, including via the Social Stock Exchange, philanthropy and a range of other standard financial routes, including the re-investment of Trust surpluses in order to provide future funding. Development and regeneration of property assets is core to this plan. This information provides the context which justifies the need for housing allocations at Broom Park, Sawmills Field and Dartington Lane and a supportive planning policy that will enable appropriate development to be planned on the core of the Estate through the preparation of an Estate Framework.

## **2.0 Issue 8.1 Approach to development (Policies TTV1 and TTV2)**

### **i) Is the hierarchy of sustainable settlements in Policy TTV1 and the settlements within each level of the hierarchy identified in the supporting text justified? Is the assessment framework used to determine if a settlement is ‘sustainable’ appropriate and justified?**

- 2.1 The DHT supports the proposed hierarchy of settlements under Policy TTV1 and agrees that the identification of Dartington under ‘The Smaller Towns and Key Villages’ tier is justified. This is on the basis that Dartington is a sustainable settlement which provides a range of facilities, services and amenities that support the social and economic vitality of the village and the wider area thus assisting in reducing the need to travel to the Main Towns.
- 2.2 Dartington village lies at the convergence of 2 major A roads (A384 and A385). It benefits from a number of facilities, services and amenities including The Shops at Dartington, a primary school and nursery, a petrol filling station (including small retail outlet), convenience store, post office, public house, garage, Bidwell Brook School for special educational needs, a place of worship, a community hall, playing field with senior-sized football pitch and a cricket pitch. There is no secondary school in Dartington, which is not unusual for a settlement of its size but the village is served by King Edward VI Community College to the west of Totnes (which is accessible by a safe walking route and has surplus capacity) and South Dartmoor Academy in Ashburton.
- 2.3 There are numerous current and proposed employment opportunities within the village including at Webbers Yard, Higher Tweed Mill and Beacon Park. The village is also well served by public transport. Seven bus services provide frequent services to a range of destination including Totnes, Newton Abbott, Torquay and Plymouth. These services run every half hour to Newton Abbot, Plymouth and Torquay, with a dedicated bus service to South Dartmoor Academy. Additionally, two community-run services offer trips to Totnes and Rattery around lunchtime each day.
- 2.4 The sustainability of Dartington is further enhanced by its close relationship with the Dartington Hall Estate where in the region of 1,500 people come to work including 400 people employed directly by the Trust, as well as a large number of volunteers (200-300 reflecting seasonal needs). The estate provides office and studio space for just under 170 local businesses. It is also a major visitor destination with currently around 300,000 people from across the UK and further afield coming to the Estate every year to participate in events, courses and festivals as well as to visit its retail and leisure venues and to enjoy its multi-layered heritage that includes historic buildings and landscape. There are now plans to grow Dartington as a major visitor destination. Added to that, our response to 8.5d confirms that an even broader range of services,

facilities, amenities and employment opportunities in Totnes is readily accessible including via a dedicated pedestrian/cycle link which connects the two settlements.

- 2.5 The Council has undertaken its own assessment of sustainability and we note the reference in the table at page 32 of Examination Document O6 that “Dartington was considered alongside other villages, and such was the level of services and facilities identified, it was considered appropriate to move Dartington into the ‘Key Villages’ part of the settlement hierarchy.”
- 2.6 This entirely appropriate approach was based on evidence gathered as part of the second Joint Local Plan village assessment consultation, held between November and December 2016. At this stage of the consultation process, Dartington was still being considered alongside our other villages, as historically that is where it sat within the settlement hierarchy for South Hams.
- 2.7 However, under this assessment Dartington achieved a score of 44 out of 47. The next highest score of the 52 villages assessed scored 40 which was Aveton Gifford and the average score for the 52 villages was 27.5.
- 2.8 The findings of this assessment therefore, raised valid questions for the Council regarding whether Dartington should still be considered in the same way as it historically had been. The Council concluded that the sustainability credentials of Dartington far exceeded its previous concept of rural sustainability, hence taking the decision to reclassify Dartington as a Key Village.
- 2.9 As demonstrated through the Council’s evidence base, the level of services, facilities, amenities and employment opportunities in Dartington is such that its designation under the Smaller Towns and Key Villages tier is entirely justified, particularly when comparing it against other key villages within South Ham and West Devon. Furthermore, the relationship of Dartington with the Estate and Totnes is such that a much broader range of services, facilities, amenities and employment opportunities are readily accessible by a range of transport options which only add to the settlement’s sustainability credentials. It is thus considered that the hierarchy insofar as it relates to Dartington is sound.

**ii) Where settlement boundaries are identified are they justified and do they take account of any outstanding planning permissions**

- 2.10 Examination Document TP2 (“Thriving Towns and Villages Settlement Boundary Topic Paper”) outlines a draft settlement boundary for Dartington which extends beyond the settlement boundary in the South Hams Local Plan to include land to the east of the A384 (i.e. The Shops at Dartington and Foxhole) and land to the north of the A385 (i.e. Broom Park). These revisions reflect the DHT’s plans for development on these sites.

*The Shops at Dartington*

- 2.11 The Shops at Dartington, alongside the existing Post Office and the small convenience store at the Texaco garage, collectively represent the ‘centre’ of Dartington and provide for day to day shopping needs. Furthermore, The Shops at Dartington provide rural employment opportunities (over 70 Dartington employees which will increase following the implementation of development proposals) and a meeting place. They are a functional part of the settlement and their inclusion within the settlement boundary is, therefore, justified.
- 2.12 The DHT is currently developing proposals which will re-invigorate and strengthen the role of The Shops at Dartington in the community whilst also creating a viable long-term revenue stream that could be re-invested in other projects across the Estate. The inclusion of The Shops

at Dartington within the settlement boundary will assist in providing a sound planning policy framework against which these development proposals can be properly assessed. This will help to secure investment and ensure a viable future for this important asset.

## *Foxhole*

- 2.13 Foxhole includes two Grade II Listed Buildings (the Former Dartington Hall School and Gymnasium) which have fallen in to a state of disrepair and limited use. Significant investment is required to roll out plans for the future of Foxhole and a long term use needs to be identified and secured. The DHT is, therefore, currently exploring options for re-use and appropriate development on adjoining land. The current proposal is around the notion of a ‘global learning campus’.
- 2.14 The inclusion of Foxhole within the settlement boundary is, in part, a reflection of the DHT’s representations to the Plan and its proposed allocation for development. Whilst the DHT, is now proposing that the allocation be omitted in favour of an Estate Framework policy, this does not undermine the principle that an appropriate scale of development at Foxhole, and including the re-use of existing buildings, would be sustainable and meet the requirements of Policy TTV2. Furthermore, the re-use of Foxhole and any associated development would fully embed the site within the functional boundary of the settlement and contribute to sustaining existing facilities and amenities within the village.
- 2.15 We note that the Thriving Towns and Villages Settlement Boundary Topic Paper (TP2) refers to the principles applied to the revision of settlement boundaries and references the inclusion of “...what appear to be heritage assets. These often form part of the historic fabric of the settlement, influencing how a settlement has evolved, and are subject to their own set of policy requirements.” This approach is entirely reasonable and is reflective of the contribution that Foxhole makes to the built fabric of Dartington.
- 2.16 We also note that in considering the Foxhole site the Council’s ‘Summary of allocated and rejected sites’ (EXC3D) states, “As well as the historical relationship between the local community and the Dartington Estate, there is a functional relationship between this part of the Estate and the constituent parts of the settlement comprising Dartington, due to close proximity and accessibility to the site’s facilities that are available to the local community”.
- 2.17 On the basis of the above, it is entirely appropriate for this site to be included within the settlement boundary.

## *Broom Park*

- 2.18 Broom Park is identified in the Plan as a proposed allocation for housing and the DHT will progress this site once it has realised its aspirations for development on the core of the Estate.
- 2.19 We note in our response to Issue 8.5 (i) (a) and (d) that the anticipated scale of housing at Broom Park is justified and that any proposal will achieve sustainable development. Furthermore, we note in our response to Issue 8.5 (b) that the housing trajectory is realistic and that it is reasonable to assume that the development of this site for housing will come forward within the Plan period. Its inclusion within the settlement boundary is, therefore, justified and is reflective of the fact that development will create a new physical boundary to the north of the village which is well contained by the Dartington to Week road.

## **C. How has the distribution of development across the settlements been determined and is it supported by evidence?**

- 2.20 Circa 73% of the allocated housing sites are within the Main Towns, with 16% in the Smaller Towns and Key Villages (STKV) and circa 11% in those villages identified as ‘sustainable’. The significant bias towards the Main Towns as the most sustainable locations for growth, followed by the larger villages (such as Dartington) and finally the more rural settlements is entirely appropriate and is justified by the Council’s evidence base.
- 2.21 Paragraph 5.9 of the Plan states that the STKVs provide a more limited range of services than the Main Towns, but that they play an important role in supporting the dispersed villages and hamlets that are located throughout the rural areas, and which sustain a large number of rural communities. Thus, in order to maintain their function, a proportionate amount of new growth is appropriate to ensure that services and facilities are not lost, but can be sustained and enhanced where appropriate.
- 2.22 A total of 8 STKV have been identified which will accommodate between 50 and 282 dwellings each. The STKV accommodating the most growth is Dartington (282 dwellings) where circa 150 - 200 dwellings are likely to be delivered on the core of the Dartington Hall Estate (to be realised through the preparation at an Estate Framework) with the remainder (132 dwellings) in the village.
- 2.23 It is considered that this level of growth within Dartington is wholly justified given its sustainability credentials. Furthermore, Dartington performs well in terms of sustainability when considered alongside the other STKVs and it is not constrained by an AONB landscape designations.
- 2.24 As noted in our response to 8.1(i), and as is recognised within the Plan at para 5.120, Dartington has an extensive range of services, facilities and amenities. It is also well connected to other centres and enjoys a reciprocal relationship with Totnes, extending the range of facilities that can be accessed within a short distance. The village also enjoys a unique relationship with the Dartington Hall Estate which further increases its sustainability credentials given the potential for local people to access a wide range of facilities services, amenities and job opportunities. Taking all these matters into consideration, Dartington is clearly a logical and appropriate location for additional housing-led growth.
- 2.25 Furthermore, the Plan notes at para 5.121 that in Dartington “...an emphasis is placed on the delivery of a high proportion of self and custom build homes in this area. This is considered to be in keeping with the heritage and legacy of Dartington, which has a global reputation, more recently through the Schumacher College, for leading on sustainable design.” The DHT is committed to achieving this objective but there are build cost implications which only serve to further support the quantum of growth that is proposed.
- 2.26 In summary, as the most sustainable and least constrained of the STKVs, housing growth in Dartington and on the Estate provides a real opportunity to focus development in a sustainable location and provide much needed housing which is commensurate with the availability of services, facilities, amenities and employment opportunities in the local area.

**(ii) Policy TTV2 seeks to deliver sustainable development in the TTVPA and lists specific attributes of rural sustainability. As the policies in the JLP when considered as a whole should form the framework for delivering sustainable development within the plan area, is the policy justified and is it clear how it will be used when considering development proposals? (Also refer to Matter 2 Q ii regarding Policies SPT1 and SPT2).**

2.27 The DHT supports the listed attributes of sustainability included within Policy TTV2 as well as the thrust of the policy which promotes sustainable development in line with the settlement hierarchy. However, there is a need for clarity about how the policy should be applied.

### **3.0 Issue 8.5 Housing Delivery in the TTVPA**

**i) In relation to housing site allocations proposed for development within the TTVPA:**

**a. Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?**

3.1 The DHT has been promoting a number of sites through the JLP for housing development and the following are identified as allocations in the Plan:

- 1 Policy TTV28 'Other Site Allocations in Totnes':
  - a (a) Dartington Lane: 45 homes
- 2 Policy TTV29 'Site Allocations in the Smaller Towns and Key Villages':
  - a (4) Dartington Hall (Higher Barton): 20 homes as part of a mixed used development
  - b (5) Foxhole, Dartington: 130 homes as part of a mixed use development
  - c (7) Broom Park, Dartington: 80 homes
  - d (9) Sawmills Field, Dartington: 40 homes

3.2 All of these sites are entirely within the ownership of the DHT.

3.3 Woodland's Yard, which has also been promoted by the DHT for development, is allocated in the Plan under Policy TTV29 but for employment use.

3.4 The preferred approach being advocated by the DHT and Historic England is that the allocations at Dartington Hall (Higher Barton), Foxhole and Woodland's Yard are omitted in favour of an Estate Framework Policy. On the assumption that these modifications are made to the Plan, the DHT has not provided any additional evidence to justify the amount of housing at Dartington Hall (Higher Barton) and Foxhole. This is because the scale and scope of development in these locations, and across the core of the Estate more generally, will be tested through the preparation of the Estate Framework, which will have regard to constraints and the provision of necessary infrastructure. The Broom Park, Sawmills Fields and Dartington Lane sites would not form part of the Estate Framework as they are located outside the core of the Estate. The allocations of these sites are, therefore, supported by the DHT as they provide logical and sustainable locations for growth and will deliver many benefits including securing a long term future for the Trust and the Estate.

3.5 The DHT's representations to the Plan have confirmed that the Broom Park, Sawmills Fields and Dartington Lane sites are suitable for housing development and referenced a number of

technical reports. In response to the Inspectors' questions, the DHT has commissioned consultants to undertake a number of additional studies to demonstrate that the proposed site capacities are reasonable in the context of any constraints and infrastructure requirements to supplement the Council'. The outcome of that work is summarised below with accompanying documentation attached as appendices.

- 3.6 The consultants' work would, in due course, be developed into more detailed proposals following discussions with stakeholders and the local community. At this stage the studies demonstrate that the scale of housing for the sites is reasonable and could be accommodated whilst also having regard to physical, environmental and technical issues of acknowledged importance.

### **Broom Park**

- 3.7 The site extends to 8.59 ha and is currently in agricultural use. A concept masterplan (Appendix 3) has been prepared by Studio Partington, which shows that approximately 50% of the site would be developed for housing.

### **Access**

- 3.8 Hydrock has prepared a Technical Note (Appendix 4) which confirms that access from the A384 can be satisfactorily achieved and that there are no highway capacity constraints that would preclude the development of the site for 80 houses. An access arrangements plan has been prepared which shows that a new priority junction can be accommodated with DHT and highway land.

### **Landscape and Visual**

- 3.9 Tyler Grange has prepared a High Level Landscape Analysis Report (Appendix 5), which concludes that through careful design (in terms of scale, massing and materials) there is an opportunity to create a high quality housing scheme that complements the local landscape character and corresponds with the key characteristics of the Mid Devon Valley and Slopes Landscape Character Area.
- 3.10 Because the site is wedged between several fragmented built-up areas, there is an opportunity to infill the undeveloped space and create a new, attractive settlement edge which could enhance the appearance of the western part of Dartington. Special regard should be paid to the condition of the existing woodland to ensure that it is retained and provides the desired backdrop and visual barrier in both close and distant views. Furthermore, the careful siting of green spaces and trees will soften and filter views.

### **Ecology**

- 3.11 An Ecological Deliverability Appraisal has been prepared by EAD Ecology (Appendix 6), which confirms that there are no overriding ecological constraints that would preclude development. There is potential for protected species to be present on the site such that detailed development proposals would need to be informed by further survey and assessment. In the event that protected species are found, appropriate avoidance, mitigation and compensation measures would be implemented to ensure compliance with relevant legislation and planning policy.
- 3.12 The site is located within the South Hams SAC 'Sustenance Zone'. Potential impacts to greater horseshoe bats would, therefore, need to be considered but it is envisaged that significant

impacts to the SAC could be avoided through retaining suitable foraging areas (woodland), flight-lines and dark corridors through/around the site or providing alternative areas.

3.13 Ecological gain within the development could be provided through enhancement of key features including hedgerows, the stream corridor and grassland areas, where these can be retained, together with the provision of other ecologically valuable habitat such as wetland and ponds as part of a Sustainable Urban Drainage Systems (SUDS). These habitats would contribute to the strengthening of the local green infrastructure. Features such as bird and bat boxes would also be provided.

3.14 An Ecological Impact Assessment (EcIA) based on detailed development proposals would accompany any planning application for development of the site.

### **Flood Risk and Drainage**

3.15 The majority of the site is shown on the Environment Agency (EA) Flood Map as being located within Flood Zone 1, which is an area of low flood risk and is thus suitable for residential development. The EA mapping shows that land to the south along Bidwell Brook is within Flood Zone 3 such that it is at risk of surface water flooding. Also, a foul sewer crosses the site from west to east to the north of Bidwell Brook, which will require an easement. The concept masterplan accommodates these constraints and shows no residential development in this location.

3.16 Overland routing of surface water will need to be considered in the layout of any proposal and the concept masterplan shows that there is scope for the incorporation of swales as part of the green infrastructure and as a design feature.

### **Historic Built Environment**

3.17 There are no designated heritage assets within the boundary of the site. There are 2 designated heritage assets within close proximity (to the north east) where development has the potential to impact upon the contribution that the setting of these assets makes to their significance:

- The Church of St Mary (Grade II\*); and
- Church Cottage.

3.18 Heritage Places has worked with the DHT for many years and advises on heritage issues across the Estate. They have confirmed that development of the site could result in a potential low level of harm to the contribution made to the significance of the Church of St Mary by its setting. However, this would be significantly outweighed by the substantial economic and social public benefits arising from development. Furthermore, the DHT would seek to mitigate any impacts through sensitive design and landscaping.

### **Archaeology**

3.19 The Devon Historic Environment Records (HER) confirms that there are non-designated archaeological features within the site including a possible prehistoric ring ditch and evidence of other prehistoric features and activity.

3.20 As part of the pre-application process, the DHT would prepare a Desk Based Assessment (DBA) in order to more clearly assess the potential significance and quality of known archaeological assets. The DBA would inform a strategy for any further work which, in most cases, leads to

targeted evaluation, mitigation or a full programme of works. The DHT would also accept a condition on any grant of planning permission for a watching brief during construction.

- 3.21 We do not anticipate that archaeology would preclude development and the size of the site coupled with a relatively low density development provides some contingency in site planning.

## **Conclusions**

- 3.22 The south of the site is constrained by flood plain and a sewer easement which limits development. Even taking this in to account, the concept masterplan demonstrates that 80 new homes could be achieved. Archaeology may be a constraint but, at this stage, we believe that it is one that can be dealt with through evaluation, mitigation and a watching brief. There is no reason to believe that archaeology would preclude any development coming forward. The density proposed across the whole site is low which provides a contingency in terms of any potential constraints. The scale of housing proposed is, therefore, reasonable.

## **Sawmills Fields**

- 3.23 The site extends to 2.57 ha and is currently in agricultural use. A concept masterplan (Appendix 7) has been prepared by Studio Partington which shows that approximately 40% of the site would be developable for housing. The northern part of the site is more steeply sloping which limits development in this location.

## **Access**

- 3.24 Hydrock has prepared a Technical Note (Appendix 4) which confirms that access to the primary highway network via the four arm mini-roundabout on the A385 has sufficient capacity to accommodate an additional 40 houses. There is also capacity within the existing internal highway network (through the existing residential development to the east) to accommodate this scale of development and the potential for an appropriate linkage/junction in to the site (the DHT has retained access rights through the adjoining residential development). The development of more than 40 houses would likely require a secondary access on to the A384, which would be challenging in terms of compliance with design guidance.

## **Landscape and Visual**

- 3.25 Tyler Grange has prepared a High Level Landscape Analysis Report (Appendix 5). It notes that Sawmills Field adjoins new housing development and will form a logical continuation of it to the west. Special regard will need to be given to the woodland within the site and any new houses should not breach the skyline currently formed by the trees.
- 3.26 With appropriate boundary treatment and management of the existing woodland, there is the potential to create a high-value space that will complement the local character and create a welcoming and balanced settlement on the approach to Dartington. An opportunity also arises from the potential of strengthening the existing field boundaries by introducing new Devon hedgebanks in places of the existing timber post & rail fences.

## **Ecology**

- 3.27 An Ecological Deliverability Appraisal has been prepared by EAD Ecology (Appendix 8), which confirms that there are no overriding ecological constraints that would preclude housing development. The site has no nature conservation designations but there is potential for protected species to be present on the site. As such, any detailed development proposals would

need to be informed by further survey and assessment. In the event that protected species are found, it is likely that appropriate avoidance, mitigation and compensation measures would be implemented to ensure compliance with relevant legislation and planning policy.

- 3.28 The site is located within the South Hams SAC 'Sustenance Zone'. Potential impacts to greater horseshoe bats would need, therefore, need to be considered. It is anticipated that significant impacts to the SAC could be avoided through ecological input to the emerging layout, landscaping and lighting proposals. This would have the objective of retaining suitable foraging areas (e.g. woodland) and flight-lines ('dark corridors') around the site. Off-site habitat creation or enhancement could also be implemented.
- 3.29 There would also be opportunities for development proposals to deliver ecological gain and to strengthen local green infrastructure. Ecological enhancement measures could include enhancement of retained habitats including woodland, creation of Priority Habitat (e.g. hedgerow, lowland meadow, ponds and broadleaved woodland) and other ecologically valuable habitats such as native trees. Bird and bat habitat could also be provided on retained trees and within new buildings.

## Conclusion

- 3.30 The only constraint to development is the topography of the site which would preclude development on the north western slope. Even taking this into account, the concept masterplan shows that the size of the site is such that it could deliver 40 new homes. The scale of housing proposed is, therefore, reasonable.

## Dartington Lane, Totnes

- 3.31 Pre-application discussions have been undertaken with South Hams District Council in respect of a proposal for 45 new homes. Whilst this scheme is no longer being progressed it demonstrated that the scale of housing on the site is appropriate. The Trust is currently developing proposals for an alternative scheme which will be submitted for planning following stakeholder and community engagement.
- 3.32 We append the pre-application sketch layout (Appendix 9) for information only and a brief summary of the key technical issues at the site which was previously submitted at the Regulation 18 stage to supplement our response to this question should any queries arise. This information demonstrates that the allocation of the site for 45 new homes is reasonable.

## **b. Is the housing trajectory (TP3C) realistic for each allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?**

- 3.33 The Trust has discussed the housing trajectories for the Broom Park, Sawmills Fields and Dartington Lane sites with the Council and confirmed that they are realistic and achievable.
- 3.34 Delivery of new homes at Broom Park is anticipated for 2028 – 2031 which reflects the Trust's aspirations to first focus development on the core of the Estate. Sawmills Fields and Dartington Lane are likely to come forward earlier during 2021 – 2023 which will allow time to work up detailed proposals and to undertake a full consultation and engagement exercise with stakeholders and the community.
- 3.35 The housing trajectory currently refers to Foxhole and Dartington Hall (Higher Barton) with capacity for 130 and 20 houses respectively. Whilst it is anticipated that development across the

Estate will deliver circa 150 – 200 new homes, the exact quantum and the location of growth should be determined through the Estate Framework. If the Councils agree with this approach, the housing trajectory, would need to be amended to reference “Dartington Hall Estate (Estate Framework Policy Area)” instead of “Foxhole” and “Dartington Hall (Higher Barton)”. Combined “net site capacity” and the “Total in trajectory” would be 150 – 200 with delivery over the period 2021 – 2027 as is currently envisaged.

### **c. Are the specific development requirements of each site allocation policy effective and justified by evidence?**

- 3.36 The DHT considers that the requirements of the Broom Park, Sawmills Field and Dartington Lane allocations, combined with the other policies in the Plan, will ensure the delivery of sustainable housing development that is well integrated with existing settlements. Furthermore, the evidence base completed by the Council alongside the site specific work undertaken to date by the DHT confirms that the development requirements are justified and effective.

### **d. Will the allocations achieve sustainable development?**

#### *Broom Park and Sawmills Field*

- 3.37 Broom Park and Sawmills Field are within the proposed Dartington settlement boundary and both sites represent logical extensions to the village. As noted in our response to 8.1(i), and as is recognised within the Plan at para 5.120, Dartington has an extensive range of services, facilities and amenities. It is also well connected to other centres and enjoys a reciprocal relationship with Totnes, extending the range of facilities that can be accessed within a short distance. The village also enjoys a unique relationship with the Dartington Hall Estate which further increase its sustainability credentials given the potential to access a wide range of facilities services, amenities and employment opportunities. With this in mind, the location of the Broom Park and Sawmills Field are such that they would be regarded as sustainable.
- 3.38 Manual for Streets paragraph 4.4.1 states that walkable neighbourhoods are typically characterised as having a range of facilities within 10 minutes walking distance (up to about 800 metres). However, it states that this is not an upper limit and that walking offers the greatest potential to replace short car trips, particularly those under 2 km. The size of Dartington is such that the Broom Park and Sawmills Fields sites would be within walking distance of a range of facilities and amenities within and around the village, and would be within easy cycling distance. The many opportunities across the Estate for employment, learning and leisure would also be readily accessible on foot and by bike. We note in our response to 8.1(i) that Dartington is served by a number of bus services. Together they combine to provide a reasonably frequent service to Totnes and a range of other destinations.
- 3.39 The DHT accepts that as in most rural areas the occupants of any future housing would likely make use of a car for at least some of their journeys. However, a number of facilities, services, amenities and employment opportunities can be accessed either by foot, public transport or cycling.
- 3.40 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. In the light of the various services, facilities, amenities and employment

opportunities within a short travelling distance of Dartington, such journeys may not necessarily be lengthy. Furthermore, the location of the Broom Park and Sawmills Fields sites on the edge of Dartington, a settlement with a number of bus services, would provide a choice of travel in accordance with the principles of the NPPF.

- 3.41 Sustainability is not just about accessibility to jobs and services. The NPPF advises that there are three dimensions to sustainable development: economic, environmental and social.
- 3.42 Economically, the development of the Broom Park and Sawmills Fields sites would provide housing to support local growth in employment,. It could also increase the number of economically active residents in the area.
- 3.43 Furthermore, housing development at Broom Park and Sawmills Fields would deliver a range of house types and include circa 30% affordable dwellings as per emerging policy requirements. Development would, therefore, diversify the housing market within Dartington and thereby add to the choice of dwellings.
- 3.44 The proposal would also increase household expenditure within the area which would be beneficial to local services and businesses both within Dartington and other nearby settlements including Totnes.
- 3.45 The environmental role of sustainability contributes to protecting and enhancing the natural, built and historic environment. The Ecological Deliverability Appraisals at Appendices 6 and 8 confirm that net gains in biodiversity could be achieved on both the Broom Park and Sawmill Field. Overall, development of the sites would, therefore, be beneficial to biodiversity by way of safeguarding and enhancing the existing habitats and increasing the range of habitats available.
- 3.46 The social role includes supporting strong, vibrant and healthy communities. In this respect the development of the Broom Park and Sawmills Fields sites for housing would meet this objective by contributing to the supply of housing required to meet the needs of present and future generations and broadening the range and tenure of dwellings available within Dartington including assisting with meeting the need for affordable housing.
- 3.47 An average of 1,114 dwellings per annum were delivered across the Housing Market Area (HMA) between 2001/02 and 2015/16 compared to an overall target of 1,720. There is, therefore, evidence of past under-delivery of housing in the HMA which indicates that household formation rates have been constrained by supply. This shortfall will have restricted the ability of people to form households. Young people will have been particularly affected, as affordability pressures in locations such as Dartington have a disproportionate impact on those with more limited means. Increasing housing development is, therefore, a vital step to ensuring that these constrained levels of household formation do not continue to limit the ability of younger people to access much needed housing.
- 3.48 Furthermore, development would also increase the opportunities for people to live close to their place of work and provide high quality built environments including areas of publicly accessible open space which would benefit the wider community. Furthermore, the Broom Park and Sawmills sites are situated within walking and cycling distance of a range of facilities, services and amenities.
- 3.49 In summary, Dartington benefits from a good range of services and facilities, and the development of the Broom Park and Sawmills Fields sites for housing would be economically, environmentally and socially sustainable.

*Dartington Lane*

- 3.50 There is no question that the Dartington Lane site, which is within Totnes and adjacent to existing residential properties, occupies a sustainable location. Indeed, the principle of housing development in this location has already been established by the grant of planning permission on land to the west and through pre-application discussions with the Council in respect of this site. Furthermore, the significant benefits of delivering much needed housing are noted above and are not repeated here. Other sustainable development credentials will be achieved through detailed design and to meet other policy requirements in the Plan.