



**DARTMOOR LOCAL PLAN**  
guiding planning applications in Dartmoor National Park

**Duty to Co-operate**  
**Statement of Common Ground**  
**Dartmoor Local Plan 2018 - 2036**

February 2020 (V2)



# Contents

Dartmoor National Park Local Plan .....	3
1 Introduction and context.....	3
1.1 Purpose of this Document .....	3
1.2 Context .....	4
2 Location and administrative areas covered by the statement Statement of Common Ground .....	5
3 Key Strategic Matters .....	6
4 Signatories to the Statement of Common Ground.....	7
5 Other Duty to co-operate partners and additional signatories .....	8
6 Strategic Matters for Co-operation .....	9
7 Strategic Priorities .....	10
7.2 National Park Purposes, Natural and Historic Environment.....	10
7.3 Spatial Strategy .....	11
7.4 Housing.....	12
7.5 The National Parks Circular 2010 requires that in furthering their statutory purposes the Parks give sufficient weight to socio-economic interests to fulfil their duty to sustain strong rural communities. This requires that they provide clear and consistent advice on what are acceptable forms of development. It states that: .....	13
7.6 Economy, Business and Leisure .....	16
7.7 Sustainable Communities, Services and Infrastructure .....	20
7.8 Minerals, Waste and Energy .....	22
8 Adjoining Local and Strategic Plans .....	23
9 Governance arrangements and review of the cooperation process .....	24
10 Timetable.....	26
Appendix 1: Assessment of Strategic Matters for Duty to Co-operate.....	27
Appendix 2: Summary table of Duty to Co-operate topics and relevant partners .....	36
Appendix 3: Signatories to the Statement of Common Ground .....	40

# Dartmoor National Park Local Plan

## Statement of Common Ground

### 1 Introduction and context

#### 1.1 Purpose of this Document

- 1.1.1 This document has been produced in response to the requirement in the National Planning Policy Framework (NPPF) that authorities ‘should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these’ (para 27).
- 1.1.2 Dartmoor National Park Authority is preparing a new Local Plan. At the start of the process, the Authority carried out a review of the strategic matters for co-operation under the Duty to Co-operate (DtC) for the Dartmoor National Park Local Plan. This was documented in the Duty to Co-operate Scoping Report (May 2017) which identifies who the Authority expects to engage with throughout the development of the new Local Plan, on what matters, and the ways the Authority will work with Duty to Co-operate partners. The Authority consulted DtC partners on the Scoping Report to confirm that the relevant strategic matters for co-operation had been identified. A few comments were received and the report was updated in the light of comments received.
- 1.1.3 A Draft Statement of Common Ground was produced to inform the consultation on the draft Plan (Regulation 18) in the autumn of 2018, sent to relevant partners and published on the Authority’s website. This provided a record of progress in addressing the cross-boundary issues affecting the Dartmoor National Park Local Plan.
- 1.1.4 This document is a second updated version prepared for the submission of the Local Plan (published alongside Regulation 19). It has been revised taking into account comments from partners received during August 2019, and subsequent comments and discussions which have taken place since (including since some organisation have signed). Following revision to areas specific to their interests only, a formal sign off by those remaining partners is now sought. Whilst DNPA considers the draft statement to truly and accurately reflect the cooperation undertaken and the areas of agreement and disagreement with relevant bodies, until this is completed, final changes to the document may still be necessary if any errors, omissions or inaccuracies are identified by any of those bodies.
- 1.1.5 The Statement of Common Ground is a new process within the more established Duty to Co-operate framework, and the process is little tested. It is clear that the Duty to Co-operate is an ongoing process through plan preparation and the Statement should be “made publicly available through the plan process” (NPPF

para 27). The assessment of strategic matters for co-operation has been kept under review and updated throughout the plan preparation process.

- 1.1.6 Updated Planning Practice Guidance (Revision 15/03/2019) provides guidance on what should be included in the Statement of Common Ground:

*“a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);*

*b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;*

*c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);*

*d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;*

*e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;*

*f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;*

*g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and*

*h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.*

*The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites”.*

## 1.2 Context

- 1.2.1 Dartmoor National Park was established in 1951 under the National Parks and Access to the Countryside Act 1949. The purposes of National Park designation are enshrined in national legislation. First set out in the National Parks and Access to

the Countryside Act 1949, and amended by the Environment Act 1995, the two statutory purposes of National Park designation are:

- to conserve and enhance the natural beauty, wildlife and cultural heritage; and
- to promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.

1.2.2 When National Parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks.

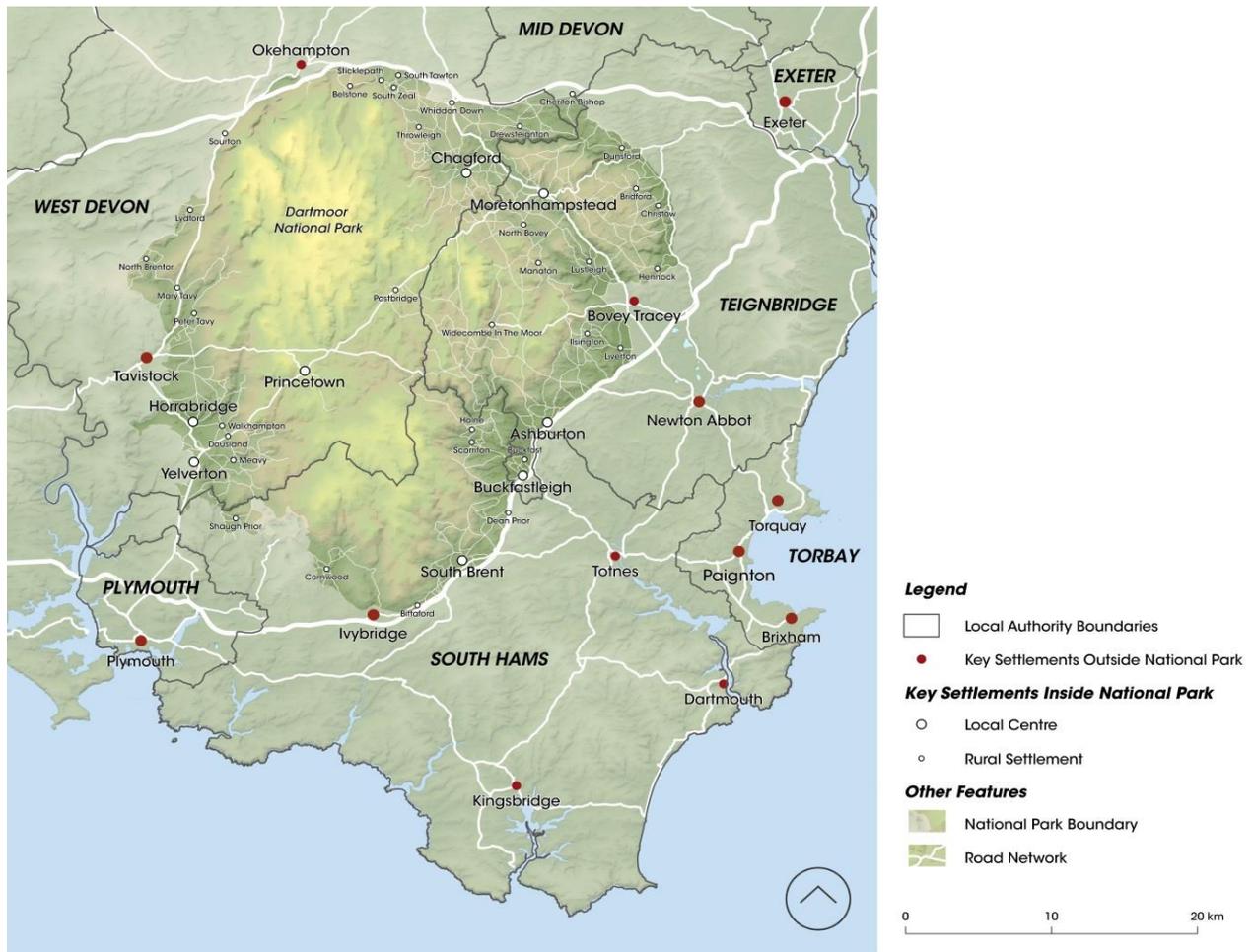
1.2.3 Section 62 of the Environment Act 1995 requires Local Planning Authorities and other public bodies to have regard to the purposes for which National Parks are designated.

1.2.4 At 954 square kilometres (368 square miles), Dartmoor is the largest open space in southern England. It has wild open moorland, granite tors and wooded river valleys. Dartmoor is an internationally renowned landscape, which has been shaped by thousands of years of human interaction with its demanding environment. It has a rich diversity of habitats resulting in part from non-intensive husbandry and land management.

1.2.5 The national status of the National Park is given great weight in national planning policy and para 172 of the NPPF (2019) states *'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.*

## **2 Location and administrative areas covered by the statement Statement of Common Ground**

2.1.1 Dartmoor National Park Authority is the local planning authority and the minerals and waste planning authority for the whole of the National Park. It is not responsible for other matters, such as transport, education, health or flood risk planning which are undertaken by Devon County Council. District Councils are responsible for other functions, such as economic development, housing, and environmental health.



**Figure 1.** Map showing Dartmoor National Park and adjoining authority areas

### 3 Key Strategic Matters

3.1.1 The Statement of Common Ground is expected to contain the key strategic matters which require cross-boundary cooperation to address. In providing guidance on how to identify strategic matters National Planning Practice Guidance advises that *‘Paragraphs 20-23 of the NPPF (Feb 2019) sets out the matters that the strategic policies should make provision for, this is not an exhaustive list and authorities will need to adapt this to meet their specific needs. For local planning authorities this is linked to matters set out in sections 33A(4) and 19(1B) to 19(1E) of the Planning and Compulsory Purchase Act 2004.’* NPPF (2019) paragraph 20 states:

*“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision<sup>3</sup> for:*

*(a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

*(b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*(c) community facilities (such as health, education and cultural infrastructure); and*

*(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.*

- 3.1.2 NPPF (2019) paragraphs 21 and 22 state plans should include strategic policies to cover relevant cross-boundary issues (para 21) and that plans should look ahead a minimum of 15 years from adoption, to take account of long term requirements and opportunities (para 22).
- 3.1.3 The NPPF also highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area – for instance, because of a lack of physical capacity or because to do so may cause significant harm to the principles and policies of the NPPF. This is particularly relevant to the National Park.
- 3.1.4 The Strategic Matters for the Dartmoor National Park Local Plan review are described in section 6, below.

#### **4 Signatories to the Statement of Common Ground**

- 4.1.1 The following partners are signatories to this Statement of Common Ground. The particular matters relevant to each Authority are noted in Appendix 2.
- Devon County Council
  - Mid Devon District Council
  - South Hams District Council
  - Teignbridge District Council
  - West Devon Borough Council
  - Exeter City Council
  - Plymouth City Council
  - Torbay Council
- 4.1.2 Dartmoor National Park is located wholly within Devon County, and is split between Teignbridge District Council, South Hams District Council, West Devon Borough Council, and a small part of Mid Devon District Council. These Authorities are therefore important partners for the preparation of the Local Plan.
- 4.1.3 Plymouth City Council, Torbay Council and Exeter City Councils are nearby Authorities which are responsible for significant growth areas that will have important implications for the National Park, and as such are also important partners for the preparation of the Local Plan.

## 5 Other Duty to co-operate partners and additional signatories

5.1.1 The other bodies subject to the Duty to Co-operate are listed in the legislation or Guidance as:

- the Environment Agency
- Historic England (the Historic Buildings and Monuments Commission)
- Natural England
- the Civil Aviation Authority
- Homes England (formerly the Homes and Communities Agency)
- each Clinical Commissioning Group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail and Road (formerly the Office of Rail Regulation)
- each Integrated Transport Authority
- each Highway Authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Aggregate Working Party
- the Mayor of London
- Transport for London
- the Marine Management Organisation

5.1.2 Duty to co-operate partners are not necessarily signatories to this Statement of Common Ground, but the statement is sent to them and they have the opportunity to confirm the accuracy of the Statement. NPPG states ‘additional signatories will be those bodies who have a role in the matters covered in a statement of common ground, and with whom an authority needs to cooperate in order to plan for these matters’.

5.1.3 A number of these organisations are not considered relevant to the Dartmoor National Park Local Plan, namely the Mayor of London, or Transport for London. Dartmoor does not have a coastline and no strategic matters for co-operation with the Marine Management Organisation have been identified.

5.1.4 Natural England is a non-departmental body responsible for ensuring that England’s natural environment is protected and improved, including by identifying and overseeing SSSIs and SACs. Two matters related to Dartmoor’s SACs in which Natural England have a specific role are identified which justifies their inclusion as an ‘additional signatory’ to this statement of common ground. These matters are:

1. The recreational impact of housing development on the National Park’s special qualities, including its Special Areas of Conservation (SACs)
2. The preparation of guidance for the South Hams SAC and specifically the greater horseshoe bats for which the site is in part designated

5.1.5 The South West Aggregate Working Party (SWAWP) is an ‘additional signatory’ with regard to the Minerals Plan. Cornwall Council can be relevant in respect of strategic minerals provision, and is engaged through the SWAWP. Local Enterprise

Partnerships (LEPs) and Local Nature Partnerships (LNPs) are not subject to the requirements of the duty to cooperate, but local planning authorities must cooperate with them and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making. DNPA is actively involved in working with both the Heart of the South West LEP and the Devon Nature Partnership on areas of mutual interest, but they do not have a specific role in the matters identified within this Statement of Common Ground.

- 5.1.6 A much wider range of bodies, not covered by the Duty to Co-operate, have an interest in the development of the Local Plan. Details of how DNPA engages with them are set out in the [Statement of Community Involvement](#).

## 6 Strategic Matters for Co-operation

- 6.1.1 Dartmoor National Park Authority has undertaken a review of the strategic matters where co-operation may be required during the preparation of the Local Plan. This has been informed by the statutory purposes and duty of the National Park along with the Devon-wide Duty to Co-operate Protocol.
- 6.1.2 The table in **Appendix 1** lists the strategic matters and provides an assessment of those where co-operation is required. **Appendix 2** provides a summary of which topics are relevant to each of the Duty to Co-operate partners.
- 6.1.3 In summary, the key strategic matters we have identified are:
- Conserving and enhancing the **natural beauty and cultural heritage** of the National Park and its setting (including landscape character and tranquillity);
  - Conserving and enhancing **biodiversity** (including ecological and green infrastructure networks);
  - The **spatial strategy** for managing development in the National Park and surrounding areas;
  - The delivery of new **homes**, including affordable homes, pitches for Gypsies and travellers and the needs of an ageing population including residential care;
  - Support for the **rural economy** including the agricultural and forestry sectors and the promotion of sustainable **tourism**;
  - The sustainable management of **recreation** and associated infrastructure, with regard to demand arising from development in areas surrounding the National Park;
  - Provision of **community services** and **infrastructure** required to support sustainable development in Dartmoor (including education, health, transport, telecommunications, flood risk management) where compatible with National Park purposes; and
  - The sustainable management of **waste** and **minerals** development, bearing in mind the status and purposes of the National Park.
- 6.1.4 The Strategic Environmental Assessment / Habitats Regulations Assessment screening and scoping was also used to inform the strategic issues for co-operation. This did not identify any new issues, but highlighted in particular the cross-boundary issues arising from predicted increases in recreation arising from

planned growth in the region, and the potential effects on Dartmoor's environment (including SACs) and local communities. This is considered in more detail in section 7.5. Other evidence-based studies were also used to inform discussion on strategic matters as preparation of the Local Plan progressed.

## **7 Strategic Priorities**

- 7.1.1 The following topics have been identified as the emerging strategic priorities for the Local Plan, and an Issues Consultation was carried out on these topics during October 2016 to January 2017:

### *7.2 National Park Purposes, Natural and Historic Environment*

- 7.2.1 The protected status of the National Park and the great weight given to this in national planning policy is a significant factor in the development of the local plan, and cross-boundary discussions regarding the scale and distribution of development. National Park status and statutory purposes constrain the scale and type of development that is appropriate within the National Park, meaning that this needs to be accommodated in adjoining areas. Local Planning Authorities have a duty under section 62 of the Environment Act 1995 to have regard to National Park purposes when coming to decisions or carrying out their duties which includes potential impacts on the setting of the National Park or historic environment designations from development outside the National Park.
- 7.2.2 The Environment section of the draft Local Plan considers the Natural and Historic environment, identifying the most appropriate policy approaches to protecting Dartmoor's nationally and internationally important landscapes, cultural heritage, biodiversity and water environment. Consideration of the historic environment will require co-operation between DCC and Dartmoor National Park Authority. Paragraph 187 of the NPPF sets out that local planning authorities should maintain or have access to a historic environment record. Effective partnership working between DCC and DNPA on evidence sharing enables the maintenance of a single Historic Environment Record which improves consistency of data across the area.
- 7.2.3 Strategic Policy 2.1 seeks to ensure development in the National Park respects Dartmoor's landscape character. Evidence has been prepared which is consistent with the overarching and adjoining Landscape Character Assessments. This area of policy is largely unchanged.
- 7.2.4 Strategic Policy 2.1 also requires the Authority to seek to ensure that proposals coming forward outside the National Park, in its landscape setting, respects Dartmoor's landscape character. Reflecting our existing working relationship, this puts a requirement on the Authority to work with its neighbouring County, Unitary and District Authorities and ensure that due regard is given to National Park purposes under Section 62 of the Environment Act.
- 7.2.5 Dartmoor National Park contains extensive habitats of international, national, regional and local importance. Habitats and ecological networks cross boundaries and co-operation is needed to protect and enhance healthy, functioning

ecosystems. There are opportunities to strengthen connectivity between habitats across boundaries, guided by Living Dartmoor (the National Park biodiversity strategy) and as part of green infrastructure networks. Living Dartmoor is developed from the Strategic Nature Areas of the South West Nature Map and is consistent with neighbouring Authorities' identified cross-boundary habitat links. Strategic Policy 2.2 and its supporting text present a stronger emphasis on local natural networks (which incorporates green and blue infrastructure) and the value of cross-boundary connectivity.

- 7.2.6 The Authority identified the three European sites (Special Areas of Conservation) on Dartmoor (the Dartmoor SAC, South Hams SAC and South Dartmoor Woods SAC) as a strategic matter where co-operation is required regarding potential impacts on the SACs. The Authority has been working with Devon County Council, South Hams District Council, Teignbridge District Council and Torbay Council, in association with Natural England, on the preparation of guidance for the South Hams SAC and specifically the greater horseshoe bats for which the site is in part designated. This aims to ensure a consistent approach amongst the authorities in relation to the SAC, to ensure that development plans (including the Dartmoor National Park Local Plan) and planning decisions, meet requirements relating to the protection of the SAC. The guidance was consulted on as a Supplementary Planning Document (SPD) during Spring 2018. It is currently being progressed as guidance by each of the Authorities it affects.
- 7.2.7 Strategic Policy 2.2 seeks to ensure that new development sustains and enhances Dartmoor's designated and priority habitats and species, and the ecological networks which support them. Following the Regulation 18 consultation, DNPA has amended the Local Plan to include specific reference to the South Hams SAC, and particularly its importance for Greater horseshoe bats. If there is potential for development to have a likely significant effect on the SAC's greater horseshoe bat population, a Habitats Regulations Assessment (HRA) should be carried out. The Local Plan policies map and Map 2.1 have been amended to show the greater horseshoe bat consultation zone. Following the Habitats Regulations Assessment, and advice from Natural England, the draft Local Plan allocations also identify where further HRA and detailed bat surveys will be required.
- 7.2.8 The draft Local Plan has also been amended to reflect the Government's recent proposals on biodiversity net gain and the Natural Environment Topic Paper 1 sets out the evidence to support the approach taken. The policy recognises that off-site biodiversity enhancement should occur where it is most environmentally beneficial and this should not be limited by administrative boundaries.

### 7.3 *Spatial Strategy*

- 7.3.1 The draft Local Plan sets out the spatial strategy which describes where different types of development are acceptable in different areas of the National Park. It aims for most new development, such as housing and new business premises, to go in the 8 largest towns and villages. There is then more of a focus on local needs housing and expansion of existing businesses in smaller villages, which are split into two categories to reflect their function and ability to support development both

in the context of infrastructure, and environmental effects. Outside of these towns and villages opportunities for new development are more limited, and focussed on farming or other rural activities and development which need to be in the open countryside. DNPA has also taken into account housing, employment, services, facilities and other infrastructure outside of the National Park in considering the spatial strategy.

- 7.3.2 DNPA has worked with adjoining authorities to ensure a consistent policy approach for settlements / parishes which are split between two Local Plan areas or closely linked in terms of role and function. These settlements are Yelverton (WDBC), South Brent (SHDC), Ashburton and Buckfastleigh (TDC) and Cheriton Bishop (MDDC).
- 7.3.3 In relation to Yelverton, South Brent, Ashburton and Buckfastleigh, the settlements fall within DNPA although the parishes themselves are split, and the spatial strategy for the settlements is set by the Local Plan policies. All four settlements are identified as Local Centres in Strategic Policy 1.4 Spatial Strategy where development intended to serve the needs of the settlement and its rural hinterland will be acceptable in principle including to meet identified local housing needs; maintain and improve employment development where appropriate opportunities exist; and maintain or enhance a range of services which serve the settlement and its wider rural hinterland. Sites are allocated in these settlements. Strategic Policy 3.1 sets out the housing need required to support residential development in these settlements will be derived from the entire parish and the adjoining parishes which are wholly or substantially within the National Park.
- 7.3.4 The majority of the settlement of Cheriton Bishop is outside the National Park but there is a small area south of the A30 which is within the National Park. The policy approach is consistent. The MDDC Submission draft Local Plan Policy S13 Villages identifies Cheriton Bishop as a rural settlement suitable for limited development including small scale housing, employment, tourism and leisure; services and facilities serving the locality; and other limited development which enhances community vitality or meets a local social or economic need. This is consistent with the draft Dartmoor National Park Local Plan Strategic Policy 1.4 Spatial Strategy which identifies Cheriton Cross/ Bishop as a Rural Settlement where development intended to meet the needs of the settlement and its parish will be acceptable in principle including meeting identified local housing needs; opportunities for small scale employment development; and to maintain or enhance a range of services and facilities which serve the settlement. Strategic Policy 3.1 sets out the housing need required to support residential development in this settlement will be derived from the entire parish and the adjoining rural parishes which are wholly or substantially within the National Park.

## 7.4 Housing

- 7.4.1 The 2019 NPPF refers to National Parks in paragraph 172 where it states great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and

enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. It does not however exclude National Park Authorities from other requirements, including those relating to the provision of housing which are set out in Section 5: Delivering a sufficient supply of homes. The requirements in this section provide the underpinning framework for the housing policies in Local Plans, including in paragraphs 77 to 79, for its delivery in rural communities.

- 7.5 The National Parks Circular 2010 requires that in furthering their statutory purposes the Parks give sufficient weight to socio-economic interests to fulfil their duty to sustain strong rural communities. This requires that they provide clear and consistent advice on what are acceptable forms of development. It states that:

*Para 78. The Authorities have an important role to play as planning authorities in the delivery of affordable housing. Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.*

*Para 79. The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term.*

- 7.5.1 The Circular remains the extant government position. This position has been reinforced recently by the exclusion of National Parks from the Standard Methodology for calculating housing needs. This confirms that government still considers National Parks to occupy a unique position as Local Planning Authorities in respect of housing supply.
- 7.5.2 This national policy context forms the foundation for the Housing Strategy in the Local Plan. This strategy is to seek to meet the identified local affordable housing need in the National Park, in those communities where it arises, and to do so with a mix of market housing that itself is meeting local need and responding to the demographic trends identified. But that the National Park does not seek to influence the affordability of housing by significantly increasing supply, nor is it appropriate for it to meet needs arising from outside of its area.
- 7.5.3 There are four separate Housing Authorities covering Dartmoor. The National Park sits within two Housing Market Areas (HMAs) – the Plymouth HMA which includes the parts of West Devon and South Hams inside the National Park, and the Exeter HMA which includes the parts of Teignbridge and Mid Devon inside the National Park. The scale and distribution of housing across the Housing Market Areas is an important element of Duty to Co-operate discussions. DNPA has worked together with its partner authorities within the respective HMAs to understand the housing needs of the National Park within the context of the two HMAs. The revised NPPF (2018) introduced a standard methodology for assessing housing need. There is no methodology for National Parks but instead the Authority “*may continue to identify a housing need figure using a method determined locally, but in doing so will need to*

*consider the best available information on anticipated changes in households as well as local affordability levels.” (Reference ID: 2a-014-20190220)*

- 7.5.4 Both HMAs have joint / strategic plans in preparation outside the National Park. DNPA was invited to consider joint plan making arrangements but, in the context of the special purpose of the National Park, the Authority took the decision to produce a standalone Local Plan for the National Park. The Plymouth and South West Devon Joint Local Plan was adopted by the constituent authorities in March 2019 and covers the administrative areas of Plymouth City, South Hams District and West Devon Borough. DNPA responded to the draft Joint Local Plan and appeared at the Examination hearings. The Greater Exeter Strategic Plan (GESP) is not as advanced, with the draft Plan timetabled for 2019, although this timetable is under review. DNPA has been involved in discussions at officer level regarding the scale and distribution of housing and also the Habitats Regulations Assessment of the strategic site allocations. There has also been extensive joint evidence gathering and an ongoing dialogue at officer level.
- 7.5.5 The policy approach to National Parks and their statutory purposes sets out that the National Park is not generally a suitable location for unfettered market housing development; a stance established by the 2010 Government Circular and Vision for National Parks and the Broads. Dartmoor National Park’s Local Plan policies therefore facilitate housing delivery in order to support local needs, subject to the landscape capacity to do so and the wider objectives of the National Park. Levels of need in the National Park are small compared to the overall housing needs of the HMAs. Importantly the NPPF also notes “*the scale and extent of development within these designated areas should be limited*” (para 172).

#### *Housing delivery*

- 7.5.6 The Dartmoor Local Plan continues the Authority’s established local needs-led approach to housing delivery. However this has been developed at a point of flux in national policy in assessing housing need for plan-making purposes. The Authorities within the Plymouth and Exeter HMAs, which cover the National Park, have worked collaboratively to identify need, and development plans which meet the need in such a way as it respects Dartmoor’s National Park status and the great weight to be applied to that in planning new development.

#### *Plymouth HMA*

- 7.5.7 The adopted Joint Local Plan (JLP) covers the city of Plymouth, and the areas of South Hams and West Devon which lie outside the National Park. The housing need for the HMA is met, largely through the JLP, but also taking into account an allowance of 600 dwellings over the JLP plan-period, which is expected to be delivered within the National Park. This figure was derived before the review of the Dartmoor Local Plan started, and is based upon the historic level of delivery within the South Hams and West Devon parts of the National Park. Within these areas, sites are allocated in Local Centres currently, and in the draft Local Plan, to meet locally identified affordable housing need, including an element of cross subsidy on sites to support delivery and create balanced communities. The overall figure for

indicative housing delivery has in the draft Dartmoor Plan risen from 50 per year, to 65 per year, across the National Park, meaning that there will be likely a slightly higher number than anticipated arising from the Dartmoor 'allowance'.

- 7.5.8 The JLP Authorities (Plymouth City Council, West Devon Borough Council and South Hams District Council) made representations at the Regulation 18 Stage of the Dartmoor Local Plan, setting out that they believed that the local plan should set out a housing requirement figure in order to provide certainty that the 'Dartmoor Allowance' set out in the Plymouth and South West Devon Joint Local Plan would be delivered, and would provide a clearer basis for setting out a housing trajectory, a 5 Year Land Supply, and monitoring housing delivery to ensure that the needs of the HMA are being met in full. Discussions have been undertaken to explore this issue in more depth, and DNPA recognises that the JLP Authorities would favour greater commitment to the delivery of the figure which is expressed in the Dartmoor Local Plan as an indicative housing delivery figure.
- 7.5.9 DNPA considers that the Dartmoor allowance is, in the HMA context, a small amount of housing. DNPA maintains that the approach taken is sound in the National Park context, and has confidence in the delivery of housing to meet identified needs within the South Hams and West Devon parts of the National Park. The key concerns of both DNPA and the JLP Authorities are to ensure that housing delivery takes place as set out in the JLP and the Dartmoor Local Plan.
- 7.5.10 In order to ensure that the Dartmoor Allowance is delivered in full over the plan period, DNPA commits to setting out a clear understanding of housing land supply and delivery in the revised Housing Topic Paper. Within a further Monitoring and Governance Topic Paper DNPA has set out a formal framework, which describes how if monitoring indicates clear under-delivery within these parts of the National Park such that the Dartmoor Allowance and local affordable housing need is not being met, and such that any under delivery impacts upon the meeting of need across the HMA, this may necessarily lead to a review in whole or part of the plan. This Topic Paper has been prepared with and agreed by the JLP Authorities.

#### *Exeter HMA*

- 7.5.11 Teignbridge and Mid Devon are working with East Devon and Exeter to prepare the Greater Exeter Strategic Plan as a statutory joint local plan. This will provide the overarching strategy for the constituent local planning authorities including the overall level and distribution of housing. Housing provision within Greater Exeter will include strategic sites allocated within the GESP itself, and other housing sites allocated in subsequent local plans prepared by the individual councils based on strategic guidance provided by the GESP. Teignbridge has commenced an update of the Teignbridge Local Plan. The GESP is currently considering housing need on the basis of the standard methodology, the results of which therefore include an element of need arising from household growth within the Dartmoor National Park portion of the Exeter HMA. The GESP authorities agree that any provision within the Exeter HMA element of Dartmoor would be designed to meet local Dartmoor need, using DNPA's locally determined methodology. In preparing the GESP, the

Greater Exeter authorities will consider to what extent this provision should be taken into account within the overall GESP housing targets.

### *Key issues for housing*

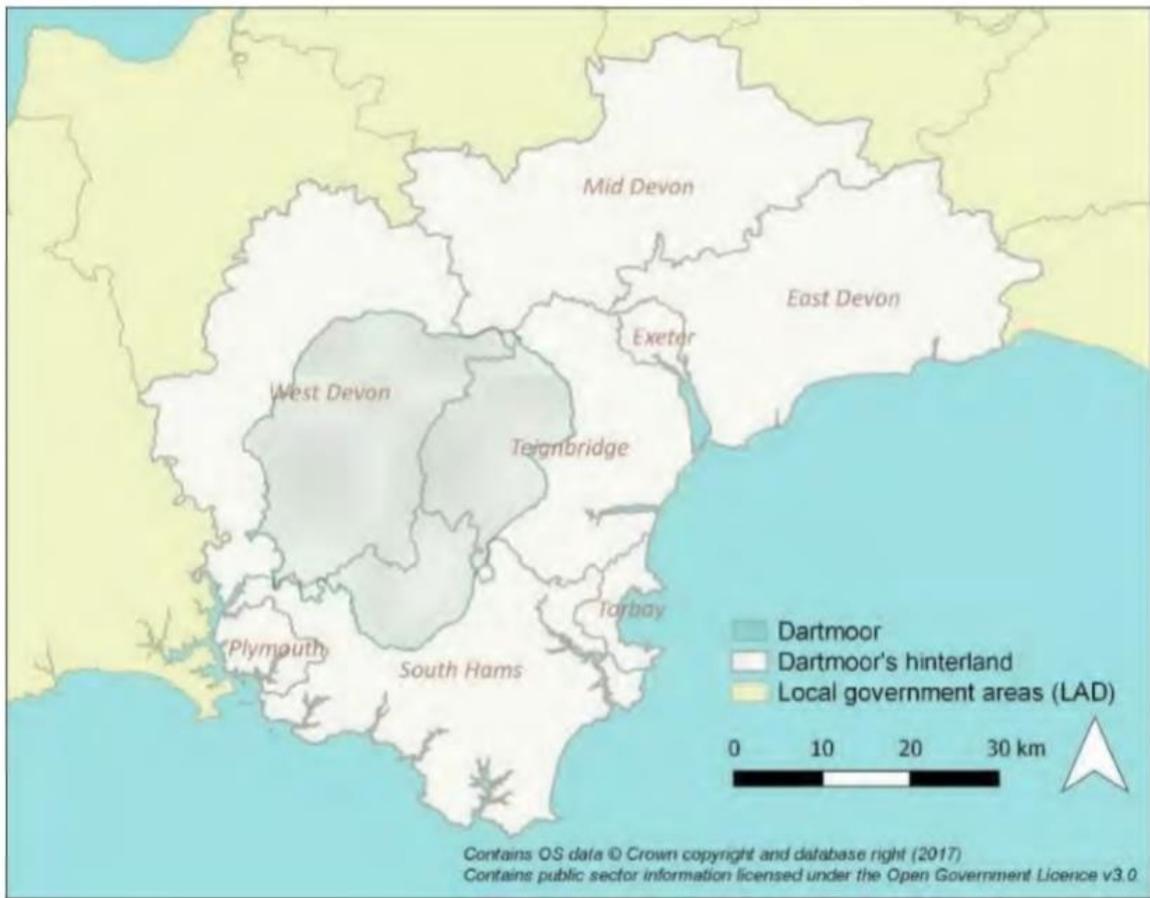
- 7.5.12 In the Dartmoor National Park Local Plan review key issues for housing are: understanding local affordable housing need, development viability (at a strategic and site level), self-build/custom build housing, conversions and agricultural dwellings. DNPA has worked closely with district housing officers to inform the policy approach to these issues. This has included housing policy meetings and attendance at the viability workshop. DNPA has a Joint Advisory Committee (JAC) for housing on Dartmoor which has DNPA, Local Housing Authority membership at an officer and Member level, as well as attendance of Housing Enablers and Homes England. Officers from the districts attended the consultation events on housing held during the Regulation 18 consultation.
- 7.5.13 Strategic Policy 3.1 describes the Local Plan indicative housing delivery figure for Dartmoor. Further detail on the rationale behind this approach is set out in the supporting text, and in more detail in the Housing Topic Paper and evidence gathered jointly with relevant duty to cooperate partners. The distribution of this figure is set out broadly in the Local Plan, in respect of the settlement hierarchy, beyond this the distribution is responsive to local needs in line with the overarching strategy.
- 7.5.14 DNPA has also worked with Devon County Council and district councils on a joint Gypsy and Traveller Accommodation Assessment which indicated a very low level of need for Dartmoor National Park. Consequently, the Local Plan does not identify a pitch target for Gypsy and Traveller sites. Instead a criteria based policy is set out which enables suitable sites to come forward where a need is identified.

## *7.6 Economy, Business and Leisure*

- 7.6.1 One of the key aims of the Local Plan review is to encourage a sustainable and diverse economic base for Dartmoor, which is both sensitive to the environment, and the needs of local communities. Key issues identified for the Local Plan include support for existing businesses to thrive and expand within the National Park, opportunities for new businesses appropriate for Dartmoor, tourism development and support for the agricultural sector, and home working. DNPA is not an economic development authority and so co-operation is required to help deliver strategic economic priorities in the National Park. As part of developing the evidence base for the economy policies in the Local Plan, DNPA held a workshop with key partners including officers from Devon County Council, South Hams, West Devon, and Teignbridge District Councils. This did not identify any specific cross-boundary issues.
- 7.6.2 Tourism and recreation are a major part of Dartmoor's economy, and rely heavily on Dartmoor's special qualities, beautiful landscape and picturesque towns and villages. Around 2.31 million people visit Dartmoor each year, spending around £139.5m (DNPA tourism statistics). Planning policy needs to carefully balance the

protection of Dartmoor, with the need to respond to changing visitor trends and demands. The growth of surrounding areas will likely place additional pressures on Dartmoor such as more traffic on Dartmoor roads, or additional visitors to popular Dartmoor ‘honey pot’ sites. This can have an impact upon biodiversity, recreational infrastructure and/or tranquillity which are special qualities of the National Park. Cross-boundary co-operation will be important to consider these pressures and how they can best be managed.

- 7.6.3 The impact of large scale housing development close to the National Park has been subject of discussion in the context of the review of the National Park Management Plan. DNPA has worked with the South West Partnership for Economic and Environmental Prosperity (SWEPP) at Exeter University to better understand the scale of growth around the National Park, and the impacts this may have in terms of increased recreational use. A report has been prepared which has been the subject of discussion with Duty to Co-operate partners.
- 7.6.4 The report highlights that Office of National Statistics population projections show that over the 25 years from 2014 to 2039, the overall population in the region (the eight local authority areas of East Devon District Council, Mid Devon District Council, Exeter City Council, Teignbridge District Council, West Devon Borough Council, South Hams District Council, Torbay Council and Plymouth Council) is projected to increase by 13% from around 1 million people in mid-2014 to 1.1 million in mid-2039. The areas predicted to see greatest growth are the main urban areas of Exeter and Plymouth and their associated new communities, as well as along the A30 and A38 corridors around Okehampton and Newton Abbot.



7.6.5 Modelling undertaken by Exeter University for the study estimates that Dartmoor currently receives around 7.8 million day visits over the course of a year. The majority of these (92%) come from the 8 neighbouring local authority areas, the remainder from the rest of England. Of all trips, 30% are ‘new’ visits, i.e. outdoor recreation would not take place anywhere else but in the National Park. When the additional growth predicted in the neighbouring local authorities is taken into account, the modelling suggests that by 2039, this will result in more than 870,000 additional annual visits to Dartmoor per year, a rise of around 12%. The study went on to consider the potential effects of this predicted increase in recreation, including the value of these visits and the health and wellbeing benefits, as well as the potential costs in relation to path erosion, disturbance to wildlife and damage to habitats.

7.6.6 Given the majority of the recreational visits arise in the adjoining areas, DNPA considers that this is primarily an issue for adjoining Local Plans rather than the Dartmoor National Park Local Plan, and will be dealt with through the provision of green infrastructure, open space, sport and recreation facilities in the surrounding areas. Plans for managing the likely increase in recreational visits to Dartmoor, and mitigating any negative impacts, are being addressed through the review of the Dartmoor National Park Management Plan, which includes updating the Dartmoor Recreation Strategy. The Authority is continuing to work with neighbouring authorities through Duty to Co-operate discussions including by encouraging them to consider the implications of the likely increase in recreation in their local plans

and to help DNPA develop a mitigation strategy to manage impacts into the future, including by supporting additional research if necessary.

- 7.6.7 Many of the areas where impacts are forecasted to increase are designated as or close to Special Areas of Conservation (SACs). The SWEEP Report identifies 12 species that stand as examples of species that might be vulnerable to disturbance from increased intensity of recreational activity.
- 7.6.8 The research indicates potential impacts within the National Park, which results in some uncertainty around potential effects on designated and non-designated habitat from recreational disturbance arising from new development planned outside the Dartmoor Park boundary. Natural England has noted that the evidence is National Park wide, and not SAC specific, and has recognised an opportunity to work with DNPA to explore whether further research would be of merit, to understand the potential recreational impact arising from new development around the National Park..
- 7.6.9 The Local Plan includes policies to support public access and recreation but to ensure that associated development does not negatively impact on the National Park's special qualities. This includes policies in the Environment section to protect the landscape character, wildlife and cultural heritage of the National Park. Strategic Policy 4.9 The Access Network seeks to ensure that 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. Although much of the increase in recreation pressure is predicted to arise outside the National Park, the Local Plan also includes requirements for developments to support public open space and sports facilities (Strategic Policy 4.2) which will provide alternative green spaces and play areas for residents, and will help to minimise the impact of new housing development on more sensitive areas of the National Park.

- 7.6.10 The HRA for the Local Plan is informed by the study carried out to better understand the potential recreational impacts of new development on the Plymouth Sound and Tamar Estuaries European sites. That study identifies that part of Dartmoor National Park lies within the Zone of Influence (Zol) for recreational users potentially visiting the site.
- 7.6.11 As part of this work, the Tamar Estuaries Consultative Forum (TECF) has developed a Mitigation Strategy, which, via contributions from new residential development within the Zol, seeks to avoid likely significant effects upon the integrity of the sites. This Mitigation Strategy (the Recreation Mitigation Management Scheme Nov 2019<sup>1</sup>) is costed based upon the level of growth planned for within the Plymouth, South Hams, West Devon and Cornwall areas; the small level of residential development anticipated within the Zol within Dartmoor National Park was not factored in. Subsequently this has been estimated at 16 homes per year.
- 7.6.12 The level of development within the National Park part of the Zol is negligible within the context of growth across the whole Zol. The potential impact of seeking financial contributions from new housing within the Dartmoor part of the Zol would be significant, in the context of the priorities for development within the National Park. On this basis the parties have agreed that whilst new residential development within the National Park would be within the Zol, it would not be required to make a financial contribution, as the contributions from the quantum of development elsewhere in the Zol will deliver the mitigation strategy.
- 7.6.13 This is agreed by the relevant Local Planning Authorities and Natural England, and a framework which will be used for the governance and monitoring of the mitigation of the Plymouth Sound SAC and Tamar Estuaries SPA in respect of Dartmoor National Park is set out in the Dartmoor Local Plan Monitoring and Governance Topic Paper.

## 7.7 *Sustainable Communities, Services and Infrastructure*

- 7.7.1 Dartmoor is a challenging environment to support robust and vibrant communities. Isolated rural villages can rely heavily on the private car, young people can struggle to stay in their local communities with difficulties to access housing, education and employment, services and facilities face challenges to remain viable. The Sustainable Communities section of the draft Local Plan includes policies to enable communities to thrive and continue to be viable and sustainable places to live and work.
- 7.7.2 Many of the settlements on Dartmoor include local convenience stores, with some of the Local Centres having a wider range of shops. However the main retail offer is provided by the cities and larger settlements outside the National Park. Future retail requirements will be considered through district retail assessments and it is not

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<sup>1</sup> <http://www.plymouth-mpa.uk/wp-content/uploads/2019/11/Recreation-Mitigation-and-Management-Scheme.pdf>

anticipated that there will be any requirement for strategic retail development requiring cross-boundary co-operation.

- 7.7.3 Devon County Council (DCC) is the Local Education Authority and is responsible for the provision of schools and school places. DCC has identified capacity issues at primary and secondary schools which have catchments within the National Park. These include primary schools at Ashburton, Ilsington, Horrabridge, Meavy, South Tawton, and Widecombe-in-the-moor, and Okehampton secondary school, where investment may be needed over the plan period. DCC has an established policy approach for Section 106 contributions. Government funding to DCC does not cover new pupil places arising as a result of new development. The Local Plan recognises (including through viability assessment) that new development may attract a requirement to contribute towards the funding of educational facilities or transport. This does not require any further strategic co-operation and the need for developer contributions in respect of the locations identified above will be considered through development management on a site by site basis.

DCC evidence demonstrates that across its area affordable housing generates pupils, and therefore that it would request contributions for education from affordable housing where there is a lack of capacity. DNPA considers that within the National Park, tightly drawn local occupancy restrictions for affordable housing may mean that new affordable housing will not necessarily generate new pupil places at the same rate. Irrespective of this, DNPA recognises that DCC does not receive new pupil place funding from other sources. A significant portion of affordable housing in the National Park is delivered through funding from Homes England, which can only be used for the purpose of delivering affordable housing. Within the National Park there is a focus upon affordable housing delivery, and the Local Plan states clearly that this is a strategic priority. DNPA would note that where an LPA is a CIL charging authority (as is the case for many other LPAs within the County), and includes education on its Regulation 123 list, a social housing relief would be applied. The intention of this relief, applied nationally, is to ensure that affordable housing is not unduly burdened by additional planning obligations. DNPA would therefore seek to apply the same principle through S106, particularly given the Local Plan's affordable housing focus.

- 7.7.4 Pupil forecasts for Ashburton Primary School identify that pupil numbers will exceed the school's current capacity and that the school, in its current form, will be unable to meet the need arising from additional development in Ashburton. The existing school site also has limited scope for extension and the development planned in the Dartmoor Local Plan is not on its own sufficient to fund the school's relocation.. DNPA is working closely with DCC and the local schools to enable local education needs to be met by creating additional capacity in the area. Discussions are ongoing.
- 7.7.5 The provision of facilities and services to support health and wellbeing will require co-operation including meeting the needs of an ageing population and the provision of residential care. It is important to establish a broad approach to housing suitable for older people which supports the draft Local Plan aim of supporting homes for a

working age population, and limiting the increasing proportion of the population which is older people. The provision of green infrastructure may also support health and wellbeing. No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.

- 7.7.6 Transport and communications is another area where co-operation is required including the approach to traffic management, freight transport, telecommunications and the provision of routes for more sustainable modes of transport including walking and cycling. Co-operation with Devon County Council as Highway Authority and Local Transport Authority, and Highways England as Strategic Highway Authority, currently takes place to cover these themes. The provision of infrastructure across boundaries for mobile phone coverage, and roll out of super-fast broadband will also need to be considered. Whilst the provision of infrastructure may include elements of partnership working on a case by case or project basis, there are currently no cross-boundary strategic issues. Policy 4.3 Enabling Sustainable Transport has been added to the draft Local Plan to encourage and enable sustainable travel by protecting, enhancing and providing new walking, cycling, and sustainable transport routes.
- 7.7.7 The management of flood risk will require co-operation with DCC as the lead local flood authority and the Environment Agency, including in particular any further revision or update of the evidence base to support the Local Plan including the Strategic Flood Risk Assessment and the Critical Drainage Areas identified on Dartmoor. No specific strategic cross boundary issues requiring co-operation have been identified. However, projects, or individual site specific proposals may come forward which require co-operation in relation to flood risk management - these will be considered on a site by site basis.
- 7.7.8 We do not usually see major infrastructure projects coming forward in Dartmoor National Park, however the Local Plan will consider the provision of infrastructure to support sustainable development. The preparation of the Infrastructure Delivery Plan (IDP) included co-operation with prescribed bodies and infrastructure providers but has not identified any strategic cross-boundary infrastructure requirements required to support delivery of the Local Plan. The Regulation 18 consultation identified the capacity issue at Ashburton Primary School and the Regulation 19 Draft consultation will provide a further opportunity for prescribed bodies and providers to comment and inform any necessary update of the IDP.

## 7.8 *Minerals, Waste and Energy*

- 7.8.1 Dartmoor National Park Authority is the Mineral and Waste Planning Authority for the area. However, like many other National Park Authorities, the level of planning involvement in mineral matters within the Dartmoor National Park Authority does not justify a specialist minerals team or officer. The Authority therefore works closely with the adjoining mineral and waste planning authority, Devon County Council (DCC), in particular with regard to evidence and reporting. As such there will need to be ongoing co-operation with DCC and other Minerals Planning Authorities regarding the assessments of minerals demand and production, and

assessments of waste arisings and disposal, bearing in mind National Park purposes. There are adequate reserves in the crushed rock aggregate landbank calculated for Devon together with adjoining authorities and National Park Authorities to provide for ongoing sales beyond the minimum number of years advised in the NPPF. No need has been identified for new sources of building stone beyond a strategic desire to provide for material which enables conservation of the National Park's distinctive character. The Plan includes Minerals Safeguarding Areas some of which are cross boundary and consistent with the approach of the Devon Minerals Plan. Dartmoor National Park is included with the Devon Local Aggregate Assessment, and a member of the South West Aggregates Working Party. No new strategic waste management facilities are needed within the National Park. Both the DCC Minerals Plan and the DCC Waste Plan are consistent with the approach set out in the Local Plan, that new larger scale development to meet minerals and waste needs will be met outside the National Park as far as is practical. There are therefore not considered to be any strategic cross-boundary minerals and waste issues. Any site specific issues will be dealt with on a case by case basis.

- 7.8.2 The Minerals, Waste and Energy section of the draft Local Plan includes discussion and policy for energy, and in particular renewable energy development in the National Park. There is already co-operation regarding policy advice and evidence on renewable energy developments through the Devon Landscape Policy Group. The Authority will continue to work with this group and neighbouring authorities to avoid impacts of renewable energy schemes on the special qualities and setting of the National Park. No specific strategic cross-boundary issues requiring co-operation in relation to energy policies for the Local Plan have been identified. Any site specific issues will be dealt with on a case by case basis.

## **8 Adjoining Local and Strategic Plans**

- 8.1.1 The Plymouth and South West Devon Joint Local Plan was adopted in March 2019. It covers the administrative areas of Plymouth City, South Hams District and West Devon Borough and is a single strategic plan dealing with land use and development. It sets out proposals that will balance the needs for housing, employment and the environment through to 2034.
- 8.1.2 The local authorities of East Devon, Exeter, Mid Devon and Teignbridge and Devon County Council are working together, engaging with stakeholders and communities, to prepare a Greater Exeter Strategic Plan (GESP). This formal statutory document will provide the overall spatial strategy and level of housing and employment land to be provided up to 2040.
- 8.1.3 Alongside the GESP, adjoining Local Planning Authorities are preparing their own Local Plans. The Mid Devon Local Plan Review 2013 -2033 is currently at

examination. Teignbridge is at the early stages of a review of its adopted Local Plan.

- 8.1.4 DCC has an adopted Devon Minerals Plan (2017) and Devon Waste Plan (2014), which cover these matter outside the National Park. DNPA was a duty to co-operate partner in the preparation of the Plans.
- 8.1.5 At an early stage of these joint Plan processes there was discussion regarding the inclusion of Dartmoor National Park. A report (NPA/16/015) setting out the options was presented to the Dartmoor National Park Authority, which set out the rationale for not including the National Park within the Plymouth or Greater Exeter Strategic Plans and this was approved by members. The report proposed that instead, there would be positive engagement between the authorities in evidence gathering, and a clear position for each authority as a stakeholder in the preparation of the respective plans.

## **9 Governance arrangements and review of the cooperation process**

9.1.1 There are a number of existing mechanisms to support co-operative working across boundaries. The following key principles illustrate how engagement and cross authority working is embedded in DNPA's approach to both plan-making and decision-taking:

- The National Park Authority comprises members of each of the key local authorities which cover the National Park area.
- The National Park Management Plan, whilst led by DNPA is a shared plan for a range of stakeholders including; prescribed bodies such as Natural England, Environment Agency, Historic England, as well as local authorities and a range of other partners.
- Section 62 of the Environment Act 1995 makes it a duty for all relevant authorities to have regard to national park purposes when coming to decisions or carrying out their duties. This duty means the DNPA has long established relationships with government departments and agencies and a range of other local and public bodies in delivering national park purposes.
- The Authority's remit differs from a local authority, DNPA is a Local Planning Authority but does not have statutory responsibilities in, for example; housing, economic development, environmental health, education, and highways, beyond its planning role. This means we work closely with these local authority

departments in both plan-making and decision-taking. This enables strong connection with other authorities at an officer level.

9.1.2 Officers continue to engage with other local authorities and agencies on the duty to co-operate around strategic issues for the area; this includes:

- Specific work on a duty to co-operate protocol led by Devon County Council to which DNPA is a signatory;
- Involvement with the Plymouth, West Devon and South Hams Joint Local Plan;
- Involvement with the Greater Exeter Strategic Plan (Teignbridge District Council, Mid Devon District Council, East Devon District Council, Exeter City Council and in partnership with Devon County Council);
- Involvement with adjoining and other relevant Local Planning Authorities in preparation of their Local Plans, including in particular Mid Devon, Teignbridge, Exeter and Torbay.
- Continued liaison with statutory bodies, for example with the Environment Agency, Natural England, Homes England, Defra and Historic England;
- Work with Devon County Council on economic development and infrastructure planning, and Minerals and Waste evidence base;
- Engagement with relevant Minerals and Waste Planning Authorities including through the Aggregate Working Party, and the Waste Technical Advisory Body;
- Involvement in cross-Devon landscape policy through the Devon Landscape Policy Group;
- The Authority is an active member of the Devon Local Nature Partnership (LNP);
- Engagement with the Local Enterprise Partnership (LEP) including joint work with Exmoor National Park on a Rural Productivity Plan;
- Neighbourhood Planning support - liaison between officers supporting Neighbourhood Plans through the South West Neighbourhood Plans Officers network to support consistency and good practice; and
- DNPA is an active member of the Devon Climate Emergency Response Group working to address the climate emergency across Devon.

9.1.3 A Devon-wide duty to co-operate protocol<sup>2</sup> was agreed in 2014 to guide strategic planning across local boundaries. Dartmoor National Park Authority is a signatory to the protocol, along with the other local authorities and other partners including the LEP, LNP and statutory environmental agencies (Natural England and Environment Agency).

9.1.4 The protocol sets out a strategic framework to enable efficient, coordinated and consistent co-operation on agreed matters. This does not preclude co-operation arrangements between organisations on specific spatial issues as is appropriate. Such relationships will specifically operate between Authorities covered by the protocol and other neighbouring Councils. The protocol also identifies the topic areas which may require specific co-operation between some, or all, of the organisations listed.

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<sup>2</sup> <https://www.devon.gov.uk/planning/planning-policies/the-duty-to-co-operate>

## 10 Timetable

10.1.1 The timetable for the Local Plan review is set out below, along with an indication of how engagement with duty to co-operate partners will be undertaken.

<b>Stage</b>	<b>Timeframe</b>	<b>Engagement</b>
<b>Evidence gathering</b>	2016 onwards	Informal consultation Joint working on evidence base studies Officer liaison meetings
<b>Issues</b>	Winter 2016/17	Consultation
<b>Options</b>	Summer/Autumn 2017	Consultation Officer liaison meetings
<b>First draft Local Plan (Reg 18 consultation)</b>	Autumn/Winter 2018	Formal Consultation Follow up responses Officer liaison meetings
<b>Revised draft Local Plan (Reg 19 consultation)</b>	Autumn/Winter 2019	Formal consultation Follow up responses Officer liaison meetings
<b>Submission and Examination</b>	Spring 2020 onwards	Participate in Examination

## Appendix 1: Assessment of Strategic Matters for Duty to Co-operate

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
<b>1. Population change/ demographic forecasting</b>	To co-operate on assessing population change and demographics including housing need	DCC TDC WDBC SHDC MDDC PCC ECC	Edge Analytics Understanding Data	Yes. Topics 1 & 2 require cross-boundary co-operation regarding the need for and distribution of housing
<b>2. Housing need and provision</b>	To provide a co-ordinated approach to the distribution of housing across the housing market area, including joint studies where appropriate.  To co-operate on meeting identified housing needs across the Housing Market Areas, including accommodating the needs arising from the National Park in adjoining authorities where appropriate.	DCC TDC WDBC SHDC MDDC PCC ECC HCA HA	SHMA (Plymouth) SHMA (Exeter) LAA Local Housing Needs Assessments Topic Paper 6: Housing Indirectly - Landscape Sensitivity Study	Yes. Topics 1 & 2 require cross-boundary co-operation regarding the need for and distribution of housing. See also No. 21 regarding Gypsy & Traveller provision and No. 19 health and wellbeing regarding the provision of housing needs for an ageing population.
<b>3. Spatial strategy / settlement strategy</b>	To ensure a consistent policy approach for settlements which are split between two Local Plan areas or closely linked in terms of role and function	TDC WDBC SHDC MDDC HA	Settlement strategy Topic Paper 4 Vision and Spatial Strategy	Yes. Co-operation is required regarding a number of settlements, particularly in relation to Yelverton (WDBC), Ashburton and Buckfastleigh (TDC) and Cheriton Bishop (MDDC)
<b>4. Economic development and</b>	To co-operate on strategic issues across functional economic areas including the protection of existing employment land,	DCC TDC WDBC	GESP EDNA ELR SHLAA	Yes. Support for key sectors and provision of an appropriate policy framework require cross-

<b>Topic</b>	<b>Strategic Priorities for Dartmoor National Park Local Plan</b>	<b>DtC Partners</b>	<b>Evidence base</b>	<b>Assessment of co-operation</b>
<b>employment strategy</b>	<p>support for key sectors including tourism and agriculture/forestry, and any proposals for strategic retail, leisure, industrial or other economic development.</p> <p>To work with the LEP to ensure that Local Plan policy framework and Strategic Economic Plan are consistent and mutually supportive.</p>	<p>SHDC MDDC PCC ECC HoSW LEP HA</p>	<p>HoSW Strategic Economic Plan, Growth Plan Dartmoor/Exmoor Rural Productivity Plan Topic Paper 8 Economy</p>	<p>boundary / agency co-operation</p>
<b>5. Transport and communications</b>	<p>To manage the impacts of transport and communications policy and provision of infrastructure across boundaries including the impact on the National Park of development in surrounding areas.</p> <p>To provide a consistent approach to traffic management, freight transport, telecommunications and the provision of routes for more sustainable modes of transport including walking and cycling.</p>	<p>DCC HoSW LEP ORR CAA HA</p>	<p>DCC LTP IDP Topic Paper 7 Transport</p>	<p>Yes. Transport policy and infrastructure provision including telecommunications and the promotion of sustainable transport require co-operation</p>

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
6. Education / skills	To ensure the provision of necessary infrastructure for education and skills to support the needs of local communities and businesses	DCC HoSW LEP	DCC IDP	Yes. The provision of necessary educational facilities and infrastructure will be a matter for co-operation with DCC (see No.20). No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.
7. Recreation, Leisure, culture and sport	To assess and avoid or mitigate impacts on the National Park from recreation and leisure pressure arising from housing development outside the National Park	DCC TDC WDBC SHDC MDDC PCC ECC TC	OSS District assessments and relevant strategies DNP Access and Recreation Strategy SWEEP Recreation Futures Topic Paper 8 Economy	Yes. Co-operation is needed to consider cross-boundary impacts of development leading to increased recreational pressure in the National Park. This could be the impacts of specific development proposals but also the cumulative impact of the scale of growth in surrounding areas given the growth ambitions of Plymouth and the Greater Exeter area.
8. Green infrastructure	To support climate change mitigation and adaptation measures across boundaries, including ecological networks and green infrastructure.	DCC TDC WDBC SHDC MDDC PCC ECC EA NE TC DLNP	IDP Living Dartmoor Topic Paper 1 Natural Environment	Yes. Cross-boundary co-operation on ecological networks and green infrastructure. See also Topic no.14.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
<b>9. National Park purposes, special qualities and setting of the National Park</b>	<p>To ensure that adjoining Local Plans include policies to protect designated areas, including the setting of the National Park and historic designations.</p> <p>To ensure that strategic allocations and planning proposals in adjoining areas are consistent with National Park statutory purposes through appropriate consultation, location, master-planning, design, and landscaping.</p>	All partners	<p>State of the Park Report</p> <p>National Park Management Plan</p> <p>Topic Paper 4 Vision and Spatial Strategy</p>	<p>Yes.</p> <p>Topic Nos. 10, 12 and 15 require co-operation as National Park status and statutory purposes constrain the scale and type of development that is appropriate within the National Park, meaning that this needs to be accommodated in adjoining areas. Local Planning Authorities have a duty under section 62 of the Environment Act 1995 to have regard to National Park purposes when coming to decisions or carrying out their duties which includes potential impacts on the setting of the National Park or historic environment designations from development outside the National Park</p>
<b>10. Coastal and marine planning</b>	Dartmoor National Park does not have a coastline and consequently does not have any direct responsibility for coastal and marine planning. The National Park covers the headwaters of several major river catchments and the majority of waterbodies are classified as 'good' or 'moderate' under the Water Framework Directive.	N/A	N/A	<p>No</p> <p>No strategic matters for co-operation have been identified relating to coastal and marine planning</p>

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
<b>11. Landscape</b>	See Topic 9 above	DCC TDC WDBC SHDC MDDC PCC NE	National Park Management Plan Dartmoor Landscape Character Assessment Dartmoor Landscape Sensitivity Study Devon Landscape Character Assessment Devon Landscape Policy Group advice Topic Paper 1 Natural Environment	Yes. See Topic 9 above
<b>12. Energy conservation, renewable energy and low carbon development</b>	To support climate change mitigation and adaptation measures across boundaries, and to avoid impacts of renewable energy schemes on the special qualities and setting of the National Park.	DCC TDC WDBC SHDC MDDC	Topic Paper 1 Natural Environment Devon Landscape Policy Group Advice	No. This would be covered under Topic 9 above. No specific strategic cross-boundary issues requiring co-operation have been identified in relation to energy development. Any site specific issues will be dealt with on a case by case basis, for example, the Climate Emergency Response Group

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
<b>13. Biodiversity, biodiversity networks and ecosystem services</b>	To ensure a consistent approach to the protection and enhancement of biodiversity across boundaries, including ecological networks and green infrastructure.	DCC TDC WDBC SHDC MDDC PCC TC NE DLNP	National Park Management Plan Topic Paper 1 Natural Environment Living Dartmoor	Yes. Habitats and ecological networks/green infrastructure cross boundaries and co-operation is needed to protect and enhance healthy, functioning ecosystems. There are opportunities to strengthen connectivity between habitats across boundaries, guided by Living Dartmoor (the National Park biodiversity strategy). Co-operation is also needed to ensure a consistent approach to statutory designations including SACs and protected species.
<b>14. Heritage considerations</b>	See Topic 9 above	DCC TDC WDBC SHDC MDDC HE	National Park Management Plan Topic Paper 2 Historic Environment Conservation Area Appraisals	Yes. See Topic 9 above. Consideration of the historic environment will require co-operation between DCC and DNPA in respect of HER. Potential cross boundary historic rail infrastructure (e.g. Wray Valley Trail, Drake's Trail)
<b>15. Minerals</b>	To ensure that a co-ordinated strategic approach is adopted to minerals and that strategic planning policies and proposals for minerals development are consistent with National Park purposes.  Given the limited scope for minerals exploitation within Dartmoor National Park, DNPA and Devon County Council will work together to co-ordinate local assessments of aggregate production.	DCC	Devon Minerals Plan 2017 LAA (annual) Minerals research/topic papers (DCC) Topic Paper 5 Minerals and Waste Development	Yes. Dartmoor National Park Authority is the Minerals Planning Authority for the National Park and the local plan will include policies relating to minerals for the whole of Dartmoor National Park. As such there will need to be co-operation with DCC and other Minerals Planning Authorities regarding the assessments of demand and production, bearing in mind National Park purposes.

<b>Topic</b>	<b>Strategic Priorities for Dartmoor National Park Local Plan</b>	<b>DtC Partners</b>	<b>Evidence base</b>	<b>Assessment of co-operation</b>
<b>16. Waste</b>	To ensure that a co-ordinated strategic approach is adopted to waste and that strategic planning policies and proposals for waste management are consistent with National Park purposes.	DCC	Devon Waste Plan 2014 Topic Paper 5 Minerals and Waste Development	Yes. Dartmoor National Park Authority is the Waste Planning Authority for the National Park and the local plan will include policies relating to waste for the whole of Dartmoor National Park. As such there will need to be co-operation with DCC and other Waste Planning Authorities regarding the assessments of waste arisings and disposal, bearing in mind National Park purposes
<b>17. Flood risk management</b>	To manage flood risk particularly the cross-boundary upstream and downstream impacts of strategic planning and development	DCC EA	Dartmoor SFRA update Catchment Flood Management Plans	Yes. The preparation of the evidence base to support the Local Plan including the SFRA update and Critical Drainage Areas designated on Dartmoor will require co-operation with the Environment Agency and Devon County Council as the Lead Local Flood Authority. No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
<b>18. Health and wellbeing</b>	To ensure a consistent approach to considering health and wellbeing in the development of planning and infrastructure related policy	DCC Clinical Commissioning Groups National Health Service Commissioning Board	IDP SA/SEA DLNP Naturally Healthy initiative Devon Joint Strategic Needs Assessment Devon Joint Health and Wellbeing Strategy 2016 Devon transforming Care Partnership Plan 2016	Yes. The provision of facilities and services to support health and wellbeing will require co-operation including meeting the needs of an ageing population and the provision of residential care. The provision of green infrastructure and the historic environment which may support health and wellbeing is covered in topics 9 and 14, and the impacts of increased recreational pressure arising from development are included in No.8. No specific strategic cross boundary issues requiring co-operation have been identified. However individual site specific proposals may come forward that require co-operation - these will be considered on a site by site basis.
<b>19. Infrastructure planning, funding, delivery, phasing and implementation</b>	To ensure adequate and effective infrastructure provision with regard to for example, transportation, telecommunications, energy, waste water, water quality, water supply, education and health facilities for the communities of the respective authorities consistent with NP purposes	DCC TDC WDBC SHDC MDDC PCC ECC EA NE HCA HA HoSW LEP DLNP	IDP	Yes. The preparation of the Infrastructure Development Plan will include co-operation with prescribed bodies and infrastructure providers to identify any infrastructure requirements required to support delivery of the Local Plan.

Topic	Strategic Priorities for Dartmoor National Park Local Plan	DtC Partners	Evidence base	Assessment of co-operation
<b>20. Gypsy and traveller policy (particularly regarding accommodation of need and provision)</b>	To ensure a consistent approach and evidence base for identification of the need for, and provision of, Gypsy & Traveller sites	DCC TDC WDBC SHDC MDDC	Devon GTAA assessment 2014 District and Joint Strategic Plan GTAAs Topic Paper 6 Housing	Yes. See Topic Nos 1 & 2.
<b>21. Neighbourhood Plans</b>	To provide a consistent approach to supporting Neighbourhood Planning in Parishes that span two Local Plan areas	TDC WDBC SHDC MDDC		No. Neighbourhood Plans are required to be in conformity with the strategic policies of Local Plans and as such it is not expected that any additional strategic cross-boundary issues will arise. A Protocol is being developed between DNPA and the District Authorities to ensure effective support for Neighbourhood Planning groups where Plans cross boundaries.
<b>22. Procedural considerations</b>	To support co-operation, best practice and efficiency in plan making	DCC TDC WDBC SHDC MDDC PCC ECC NE EA HE		No. This is not a cross boundary strategic planning issue. However DNPA will work with other prescribed bodies and partners to co-operate in relevant discussions regarding best practice and efficiency in Local Plan preparation. A <a href="#">report</a> (NPA/16/015) setting out the rationale for not including Dartmoor National Park within the Plymouth or Greater Exeter Strategic Plans was approved by members.

**Appendix 2: Summary table of Duty to Co-operate topics and relevant partners**

Topic	DCC	TDC	WDBC	SHDC	MDDC	PCC	ECC	TC	EA	NE	HisE	HomE	HigE	CAA	CCGs/ NHSCB	ORR	HoSW LEP	DLNP
Population change/ demographic forecasting	X	X	X	X	X	X	X											
Housing need and provision	X	X	X	X	X	X	X					X	X					
Spatial strategy / settlement strategy	X	X	X	X	X								X					
Economic development and employment strategy	X	X	X	X	X	X	X						X				X	
Retail planning		X	X	X	X	X	X										X	
Transport	X												X	X		X	X	
Education / skills	X																X	
Recreation, leisure, culture and sport	X	X	X	X	X	X	X	X										
Green infrastructure	X	X	X	X	X	X	X	X	X	X								X
National Park purposes & special qualities	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Topic	DCC	TDC	WDBC	SHDC	MDDC	PCC	ECC	TC	EA	NE	HisE	HomE	HigE	CAA	CCGs/ NHSCB	ORR	HoSW LEP	DLNP
Landscape	X	X	X	X	X	X				X								
Energy conservation, renewable energy and low carbon development	X	X	X	X	X													
Biodiversity, biodiversity networks and ecosystem services	X	X	X	X	X	X		X		X								X
Heritage considerations	X	X	X	X	X						X							
Minerals	X																	
Waste	X																	
Flood risk management	X								X									
Health and wellbeing	X														X			
Infrastructure planning	X	X	X	X	X	X	X		X	X		X	X				X	X

Topic	DCC	TDC	WDBC	SHDC	MDDC	PCC	ECC	TC	EA	NE	HisE	Home	HigE	CAA	CCGs/ NHSCB	ORR	HoSW LEP	DLNP
<b>Gypsy and Traveller policy</b>	X	X	X	X	X													
<b>Neighbourhood Plans</b>	X	X	X	X	X													
<b>Procedural considerations</b>	X	X	X	X	X	X	X		X	X	X							

Key:

DCC – Devon County Council (also Highways Authority, Education Authority and Lead Local Flood Authority)

WDBC – West Devon Borough Council

MDDC – Mid Devon District Council

ECC – Exeter City Council

EA – Environment Agency

HisE – Historic England

DLNP – Devon Local Nature Partnership

HigE –Highways England

SHDC – South Hams District Council

PCC – Plymouth City Council

TC – Torbay Council

NE – Natural England

Home –Homes England

HoSW LEP – Heart of the South West Local Enterprise Partnership

NHSCB – National Health Services Commissioning Board

CCGs – Clinical Commissioning Groups

ORR – Office of Rail and Road

TDC – Teignbridge District Council

CAA – Civil Aviation Authority

### Appendix 3: Signatories to the Statement of Common Ground

The Statement of Common Ground was initially signed in Autumn 2019. Revisions were subsequently made to the Statement in Spring 2020 regarding cross-boundary issues on recreational impacts of the Plymouth Sound SAC. A revised Statement was then produced to take account of these issues. The signatories involved in these revisions signed the Statement in Summer 2020.

Partners who signed in Autumn 2020 have confirmed that these revisions do not affect their agreement to the Statement and that their signature is still valid. Therefore, some signatories below are dated earlier than others.

#### Autumn 2020 Signatures

Devon Country Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Devon County Council:

Name: Mike Deaton  
Role: Chief Planner  
Signed: Mike Deaton  
Date: 17 September 2019

South West Aggregates Working Party

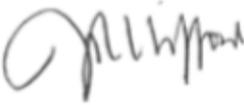
The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to the South West Aggregates Working Party:

Name: Ellie Inglis-Woolcock  
Role: Chair, South West Aggregates Working Party  
Signed: E. Inglis-Woolcock  
Date: 23/9/19

Mid Devon District Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Mid Devon District Council:

Name: Jenny Clifford  
Role: Head of Planning, Economy and Regeneration  
Signed:

J. Clifford  Date: 16/9/19

*Summer 2020 Signatories*

Plymouth City Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Plymouth City Council:

Name: Richard Grant  
Role: Strategic Planning Manager (Joint Local Plan)  
Signed:

 Date: 27<sup>th</sup> July 2020

South Hams District Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to South Hams District Council:

Name: Richard Grant  
Role: Strategic Planning Manager (Joint Local Plan)  
Signed:

 Date: 27<sup>th</sup> July 2020

West Devon Borough Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to West Devon Borough Council:

Name: Richard Grant

Role: Strategic Planning Manager (Joint Local Plan)

Signed: 

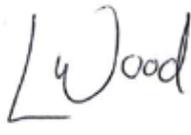
Date: 27<sup>th</sup> July 2020

Cornwall Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Cornwall Council:

Name: Louise Wood

Role: Service Director – Planning & Sustainable Development

Signed: 

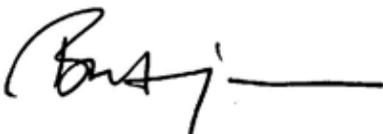
Date: 14<sup>th</sup> August 2020

Exeter City Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Exeter City Council:

Name: Bindu Arjoon

Role: Director

Signed: 

Signed:  
Date: 15/07/2020

Teignbridge District Council

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Teignbridge District Council:

Name: Neil Blaney

Role: Head of Place and Commercial Services

Signed:



Date: 16th July 2020

Natural England

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Natural England:|

Name: Denise Ramsay

Role: Senior Adviser Planning and Team Leader

Signed:



Date: 18 August 2020

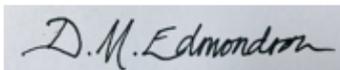
Torbay Council<sup>3</sup>

The signature below confirms agreement that the Statement of the Common Ground is an accurate summary of the cross-boundary matters being addressed that are relevant to Torbay Council:

Name: David Edmondson

Role: Assistant Director – Planning, Housing & Climate Emergency

Signed:



Date: 20<sup>th</sup> August 2020

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<sup>3</sup> Torbay Council added three comments to the Statement before signing, stating that these comments are for Dartmoor's consideration but are content if the text is retained as is. These comments were (*italics denotes additional or changed wording*):

Section 4.1.3 - 'nearby *unitary* Authorities'

Section 7.2.6 - The guidance was consulted on during Spring 2018 and adopted by each of the Authorities it affects. The final, published wording was produced in October 2019.

Section 7.5.4 – 'timetable for 2020.'