

COMMENT FORM

Final Draft Local Plan Consultation: 16 September - 1 November 2019

Your comments will help us and the Inspector to identify any issues with the Plan relating to soundness, legal compliance and compliance with the Duty to Cooperate, and any changes to the Plan which may therefore be needed prior to adoption. Please carefully read the [accompanying guidance](#) before answering the following questions.

Responses must be received by 5pm on Friday 1st November 2019 for your comments to be taken into account. View the Dartmoor Local Plan (2018-2036) Final Draft at www.dartmoor.gov.uk/localplanreview.

PART A - About You

Personal details

First name *	Claude						
Surname *	[REDACTED]						
Address	[REDACTED]						
Post code	[REDACTED]						
Email address *	[REDACTED]						
I am completing this form as (choose one)	A resident	X	An agent		A Town / Parish Council		An organisation
	A business		A visitor		A statutory agency		Other (specify below)
Other							
Job title (where relevant)							
Organisation (where relevant)							
On behalf of (where relevant)							
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes	X	No				

* Required field

Data Protection Act 2018

Your personal data will be securely held by Dartmoor National Park Authority for the purpose of assisting with the Local Plan Review process. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has commented on the plan. For the purposes of the examination, we will share your personal details and representation with the Inspector appointed, and publish your name and representations as part of a report on our website. For more information please refer to our [Forward Planning Privacy Notice](#).

Tick the box below if you would like to be added to our Local Plan consultee database and kept up to date with the Local Plan Review process and other planning policy matters.

☐ I would like to be added to the Local Plan consultee list

PART B - Your Comment

Please carefully read the [accompanying guidance](#) before answering the following questions.

Your comments should relate to specific areas of the plan, so please tell us the policy or paragraph number that your comment relates to. If there are areas which you believe not to be sound or legally compliant, please tell us why, and what changes you deem necessary, sharing any evidence you have to support your proposed changes.

If this is a report or any other document which cannot be shared via this form then you can email it to us at forwardplanning@dartmoor.gov.uk.

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	Strategic Policy 1.4 (1) Spatial Strategy; 1. Local Centres; a) Section 3 Housing, Strategy the figure in the statement "Around 65 new homes will be built in the National Park each year." should be substantially reduced for sustainability
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		
ii) Sound		X
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above.
Fully explain your reasoning and try to be as precise as possible.

The "indicative delivery figure of 65 dwellings per year" should be substantially reduced for sustainability. This figure is unsound because:

1. **By removing park land for urban uses to maintain present skill and labour and 'improve' the age distribution, it compromises the ability of future generations in the Park, the county and the nation to meet their own needs for National Park values.**
2. **With the present rate of out-commuting from the Park for work at 23%, the new homes, particularly in communities on the A38 and A386, continue to provide housing to neighbouring authorities.**
3. **It does not consider skills and labour available from just outside the Park.**

See full comment on the final page.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

Reduce the "indicative delivery figure of 65 dwellings per year" until the projected net out-commuting rate is reduced to zero percent.

[Additional space on final page]

Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

No. I do not wish to participate in hearing session(s)	X	Yes. I wish to participate in hearing session(s)
---	---	---

6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

I indicated **yes** because I am willing to participate if you think there is value in my presence or that my comment will not be addressed unless I am there in person. I do not consider my presence to be necessary if my comment is addressed in writing. Although I made a similar comment on the previous draft, I saw no reflection of it in the review documentation nor in the final draft.

Thank you for sharing your comments on the final draft Local Plan for Dartmoor. If you have more comments to share, please complete parts C-F below.

Following this consultation, the final draft Plan along with all comments made will be submitted for examination by a Planning Inspector. The Inspector will consider whether the plan complies with the relevant legal requirements and whether it is sound (see guidance). Keep up to date on our progress by [signing up to our Local Plan consultee list](#), and following us on Twitter [@DartmoorPlan](#) and Facebook [/DartmoorPlan](#)

PART C - Additional Comment (1)

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		
ii) Sound		
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	Yes , I wish to participate in hearing session(s)
--------------------------	--	--------------------------	--

6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

PART D - Additional Comment (2)

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		
ii) Sound		
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	Yes , I wish to participate in hearing session(s)
--------------------------	--	--------------------------	--

6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

PART E - Additional Comment (3)

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		
ii) Sound		
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	Yes , I wish to participate in hearing session(s)
--------------------------	--	--------------------------	--

6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

PART F - Additional Comment (4)

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		
ii) Sound		
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No , I do not wish to participate in hearing session(s)		Yes , I wish to participate in hearing session(s)
--	--	--	--

6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

Additional space (please tell us which question you are continuing from):

Comment 1.

Strategic Policy 1.4 (1) Spatial Strategy; 1. Local Centres; a) The “indicative delivery figure of 65 dwellings per year” should be substantially reduced for sustainability.

Section 3 Housing, Strategy the figure in the statement “Around 65 new homes will be built in the National Park each year.” should be substantially reduced for sustainability.

The figure of 65 new homes per year is unsound because

1. It is based on reasoning that is contrary to the NPPF objective for sustainability. That is, the resulting supply of new homes intended to meet the demands of the present, including skill, labour and age distribution of the populace within the park, compromises the ability of future generations in the park, the county and the nation to meet their own needs for National Park values. Once land is built upon, it is essentially removed from contributing to National Park values.
2. It is based on unstated cooperation with neighbouring authorities to provide housing to satisfy their demand for skills. Cooperation with neighbouring authorities is required by NPPF paragraphs 26 and 27.
 - a. The Non-Technical Summary of the Sustainability Appraisal made for the DNPA’s Local Plan Review (June 2019 version) paragraph 17 states:

“There is a net out commuting for work from Dartmoor for about 23% of workers and a key factor is to increase opportunities for home working.”

b. Both the net out commuting and working from home opportunities represent an excess in the present demand for skills and labour within the park. Based on the Housing Evidence Summary contained on page 58 of the Local Plan, it would appear that skill and labour requirements within the park could be more than met by only building 30 homes per year. If the projections were made for no new construction of homes, it is possible that it would show that present and future skill and labour requirements within the Park could be met without any new homes.
 - c. All of the development centres in the Local Plan are within commuting distance of Plymouth, Exeter and beyond. In particular the corridor communities of Horrabridge, Yelverton, South Brent, Buckfastleigh and Ashburton have easy

access for motor transport. Any development in the centres is likely to have levels of out commuting in excess of the Park net average.

3. It does not consider skills and labour available from just outside the Park.
 - a. The *Extended Summary of Population futures and Dartmoor National Park: Implications of development around the outskirts of Dartmoor for recreational use and management of access (August 2018 version)* forecasts an increase of 100,000 people over the 25 years (2014-2039) within the Park and its outskirts (see Figure 1). The Local Plan does not consider the skills and labour of the populace outside the Park yet within its outskirts in establishing the figure of 65 new homes per year. These people are a resource for potentially providing the skills and labour requirements within the Park.
 - b. People living in close contact with Dartmoor in communities such as Ivybridge, Bovey Tracey, Okehampton and Tavistock are as environmentally friendly in transport terms to many jobs inside the Park as are people living in communities like South Brent, Buckfastleigh and Ashburton.
4. I gave a brief summary of these reasons for reducing the figure of 65 new homes per year in the previous review cycle. I had difficulty expressing my views fully in the online review provisions; as a consequence they may not have been fully appreciated in preparing the final plan. New evidence to support the unsoundness of this figure is the following skill and labour assessment of my neighbourhood, which comprises 7 homes in Horrabridge. Though this may be too small a sample on which to base a plan, it does show that maintaining the present level of skills and labour within the Park is a complex subject that is not likely to be satisfactorily met by building more homes within the Park.
 - a. One home is occupied by two people both retired. One was teacher in Plymouth prior to retirement and the other performed and presently performs volunteer work in Tavistock.
 - b. One home has not been occupied in the last ten years. It is being renovated for a retired couple.
 - c. One home is occupied by two people both retired. One worked from home and the other worked part-time within the Park. One of these people currently performs volunteer conservation work within the Park.
 - d. One home has not been occupied in the last 20 years except on brief occasions.
 - e. One home is occupied by two people both working. One is a building contractor usually working outside the Park. The other is a teacher usually working outside the Park.
 - f. One home is occupied by two people and their two children. The couple both work outside the Park.
 - g. One home is occupied by two people and their two children. The couple both work outside the Park.

If you require help, or would like to receive this form in an alternative format, please contact the Forward Planning team:

Forward Planning, Dartmoor National Park Authority
Parke, Bovey Tracey, Devon, TQ13 9JQ

Tel: 01626 832093
Email: forwardplanning@dartmoor.gov.uk
Website: dartmoor.gov.uk/localplanreview