



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 *	Bas					
Surname *	PAYNE					
Address	[REDACTED]					
Post code						
Email address *						
I am completing this form as (choose one)	A resident	An agent	A Town / Parish Council	x	An organisation	
	A business	A visitor	A statutory agency		Other (specify below)	
Other						
Job title (where relevant)	Parish Councillor; Chair of Parish Council Planning Committee					
Organisation (where relevant)	Moretonhampstead Parish Council					
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 Yes, please. (I couldn't make the box on the left accept input)

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)	Please see Section 3 below.
Policy (enter number, e.g. 4.5)	Please see Section 3 below.
Policies Map	Please see Section 3 below.

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		No
iii) Compliant with the Duty to co-operate		No

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.

Initial comment:

We have found DNPA's insistence on comments being made separately on each policy, and separating supporting comments and objections, difficult to work with, and counterproductive. Policies often need to be considered in relation to each other in order to be "joined-up". We tried to make our comments on the first draft comply with DNPA's request; we hope the Inspector will understand our reluctance to do so again at this stage.

We have as a result submitted separately in tabular form, our comments on different policies in the first draft, the effect that these have had, and our suggestions and comments at this stage. Here we make more general comments on soundness and on the duty to co-operate.

Soundness:

Housing: Our primary concern is with the lack of soundness of the policies relating to housing. The final draft local plan (Policy 3.1) proposes an indicative target for the National Park of 65 new homes a year (with around 69 houses proposed for the three allocated sites in Moretonhampstead (Policies 7.10-12)). This target is based on the need to attract more younger people and families, which we support. However the population modelling used is not documented in a way that allows us to examine its method and assumptions and so test its soundness, and, given the fact that the definitions of affordable that are used aren't realistically locally affordable given the ratio between average market price and average local wages (Final Draft p.58), the 45% affordability target, and DNPA's past poor record of delivering on affordability targets, it seems to us highly unlikely that putting 65 new homes on these sites will deliver any significant number of genuinely affordable houses. Instead, it's likely to attract more wealthy older buyers, which isn't what Moreton needs or wants, would place even more strain on traffic and parking - issues which aren't addressed affectively by Policy 4.3, and would have a damaging impact on the appearance and feel of the town without adequate balancing gain.

We would comment that it seems to us that part of the problem lies in DNPA's failure to take sufficiently into account issues which it doesn't have direct responsibility for, such as traffic, parking, and social housing (which DCC and TDC are responsible for).

Sustainability: We are increasingly concerned also at the lack of coherent and sensible policies in relation to sustainability and environmental impact. It seems to us to make little sense, for instance, in insisting on the use of traditional local materials (Policy 1.7) while at the same time preventing their local extraction (and the employment this would create), resulting in the need to ship granite and slate in from China, India and Brazil. Many of DNPA's current environmental policies (e.g. Policies 1.7, 2.3 and 4.5) appear to be unlikely to deliver real and cost-effective benefit.

The duty to co-operate:

Moretonhampstead Parish Council carried out a survey of local opinion last year, in order to better inform our response to the first draft local plan. We received nearly 400 replies from local residents

- something like 25% of the number of registered voters in the parish - which is an unusually large response for such surveys, evidence both of the concern local residents feel, and of the care we took to encourage participation. We took no position prior to or during the survey to influence responses - we simply wanted to know what our community thinks. We kept DNPA informed through this process, sent them copies of everything and invited comments; sadly we received very little response. We are submitting separately a copy of the survey as part of our response to this consultation.

At the time of the consultation on the first draft local plan, we submitted around 25 comments on different policies, some supportive, some objecting, all based on the results of our local survey and further discussions within the community. Sadly, as the separate tabulated summary shows, we had little or no response from DNPA, and our comments had little effect on the Final Draft. We would also comment that the timing of this most recent round of consultation is sadly typical of DNPA's failure to consult constructively. The Final Draft was published on 16 September; councillors were invited to a meeting the next day, before they had had reasonable time to read and assess the final draft. As our Parish Council, like many, meets only once a month, during the first week of the month, the 1 November deadline for comment has made it harder for us to meet and discuss the final draft and our response: DNPA should have recognised the problem and given us and other Councils time to consider the final draft and our response at more than one regular meeting between the publication date and the deadline.

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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.

We feel that the housing policy needs to be recast, removing the "indicative target", and laying greater emphasis on the need for social rented housing, which seems to be the only realistic current way to provide affordable and flexible housing for young families, and on the need to consider infrastructure issues. This would give more hope to younger families, and reduce the risk of unacceptable environmental damage and pressure on an overstretched infrastructure. We feel that the environmental and sustainability policies also need to be rewritten in order to provide real benefit at reasonably-affordable cost.

For other suggestions, please see the tabulation submitted with this response.

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5. **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.
6. 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)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

This response is - as requested - brief. If the Inspector wishes to explore the issues we raise, we are of course very willing to assist.

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

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>i)</i> Legally compliant		
<i>ii)</i> Sound		
<i>iii)</i> 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]

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	Yes , I wish to participate in hearing session(s)
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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>i)</i> Legally compliant		
<i>ii)</i> Sound		
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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.

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PART E - Additional Comment (3)

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

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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:

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<i>i)</i> Legally compliant		
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<i>iii)</i> 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.

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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>i)</i> Legally compliant		
<i>ii)</i> Sound		
<i>iii)</i> 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]

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

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

Tel: 01626 832093

Parke, Bovey Tracey, Devon, TQ13 9JQ

Email: forwardplanning@dartmoor.gov.uk
Website: dartmoor.gov.uk/localplanreview