

About you

- First name: Paul
- Surname: Pine
- Address: [REDACTED]
- I am completing this form as: A resident
- If other, please specify: •
- Job title: Commander
- Organisation: Royal Navy
- On behalf of: •
- Email address: [REDACTED]
- Did you submit comments on the Regulation 18 (First Draft) Local Plan?: Yes
- Local Plan Consultee List: I would like to be added to the Local Plan consultee list

Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Policy
- Please tell us which paragraph/policy your comment relates to: Proposal 7.19 (2) Land at Binkham Hill, Yelverton
- Do you consider the Local Plan to be legally compliant?: Yes
- Do you consider the Local Plan to be sound?: No
- Do you consider the Local Plan to be compliant with the duty to co-operate?: Yes

- Please tell us why you have answered yes and/or no to the questions above:

I am not in a position to say whether the Local Plan is both legally compliant and compliant with the duty to co-operate, but I am assuming that it is. I do not consider the Local Plan to be sound though with regard to Proposal 7.19 (2) Land at Binkham Hill, Yelverton.

The Binkham Hill Proposal is not sound for a number of reasons. - The proposal allocates development of 'around 41 homes' (with 45% for affordable housing) in a site of 1.48 ha, whilst a similar proposal in Yelverton 'Proposal 7.18 (2) Land at Elfordtown, Yelverton' allocates 'around 40 homes' (with 45% for affordable housing) in a site of 1.99 ha. The Binkham Hill Proposal should have the number of homes reduced to reflect parity between options in Yelverton for development. I would suggest 30 homes over 1.48 ha is equivalent housing density to 40 homes over 1.99 ha. - The number of homes (41) is in addition the Binkham Hill Proposal since the December 2018 First Draft of the Local Plan. These homes are there 'to meet identified local needs', yet the plan is not clear in how these needs have been calculated, or will be calculated in the future. Strategic Policy 3.3 (page 69) sets out guidelines for new housing development in Local Centres, but not how the needs are calculated. The Local Plan needs to demonstrate how it arrived at the numbers of homes allocated to each Proposal and describe how 'identified local needs' will be calculated in the future. - Proposal 7.19 (2) Land at Binkham Hill (page 148) part (c) refers to 'appropriate highway improvements to access Plymouth Road'. Plymouth Road is nowhere near Binkham Hill, but is the A386 near Horrabridge. Binkham Hill is next to Dousland Road, this should be corrected. - Proposal 7.19 refers to 'land' and does not recognise that it is currently green-field working farmland, providing local employment and locally sourced food, meeting local population needs. It supports the 'Special Qualities of Dartmoor National Park' stated in paragraph 1.1.8 providing 'traditional farming practices, using the moorland commons for extensive grazing of hardy cattle, sheep and ponies'. This land use and 'Special Qualities of Dartmoor National Park' constraint should be included in the Proposal. - Proposal 7.19 also cuts the current farming pasture in half impacting the number of animals that graze on the land, access to and from the field, the impact on local farmers, loss of green space in favour of urban and how any boundary would be established. To maintain the 'Special Qualities of Dartmoor National Park' the introduction of 'dry stone walls and hedgebanks' could be included. These land type aspects and constraints should be included in the proposal. - This proposal for housing
- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?:

at Yelverton does not include any proposed uplift for additional Services such as GP and Dentist (with National Health Dentists rather than Private to support affordable housing families), and more importantly the introduction of Services that do not currently exist in Yelverton, most notably a Primary School. The Yelverton Settlement Profile (September 2019) Map 3 – Settlement Services (page 8) has a Legend for Key Services which do not exist, for example Primary School, Bank and Public Library. Both the Proposal 7.19 and the supporting Yelverton Settlement Profile require updating to reflect the actual key services available and emphasis the ones that do not currently exist. - Proposal 7.19 makes reference to a 'link to the Drake's Trail' yet this is not referred anywhere else within the Local Plan. Details of this need to be included so it is clear what is 'Drake's Trail' and how any link may impact the local population and 'Special Qualities' of Dartmoor. The current Drake's Trail Cycle Path is on the other side of Yelverton about half a kilometre away. - Proposal 7.19 increases housing in Yelverton, will also increase road traffic and parking requirements in local facilities (shops) and services (doctor, dentist), and those facilities that will require additional public transport (Primary Schools in Horrabridge, Meavy and Walkhampton) which currently do not exist. Any proposal in Yelverton should also address the traffic uplift required in these additional parking requirements and facilities to support the increased local population. - Proposal 7.19 does not fully consider 'Strategic Policy 1.4 Spatial Strategy' specifically to Yelverton with its unique proximity to major towns (between Tavistock and Ivybridge), city (Plymouth) and adjacent Villages (Crapstone and Axtown) which are outside the National Park Boundary when considering housing needs. Many people outside the National Park Boundary use the National Park routinely often commuting through it on a daily basis, eg Tavistock to Plymouth via Yelverton is a particularly busy road. Yelverton has a much bigger role than housing, as it is the gateway to the National Park from the major city of Plymouth. This is not considered in the Plan or the Yelverton Settlement Profile. The Plan and Profile should be updated to reflect the unique position of Yelverton, proximity to Plymouth and role as a gateway settlement serving the wider community.

- Do you wish to participate in hearing session(s)?:

Yes, I wish to participate in hearing session(s)

Share your comments

- Does your comment relate to a paragraph, policy or policies map?:

Policy
- Please tell us which paragraph/policy your comment relates to:

7.20 Yelverton Special Policy Area
- Do you consider the Local Plan to be legally compliant?:

Yes
- Do you consider the Local Plan to be sound?:

No
- Do you consider the Local Plan to be compliant with the duty to co-operate?:

Yes
- Please tell us why you have answered yes and/or no to the questions above:

I am not in a position to say whether the Local Plan is both legally compliant and compliant with the duty to co-operate, but I am assuming that it is. I do not consider the Local Plan to be sound though with regard to Proposal 7.20 Yelverton Special Policy Area.
- What modifications do you consider necessary to make the Local Plan legally

The Yelverton Special Policy Area is not sound for a number of reasons. - It is the only 'special' policy area within the whole plan, and only one of two 'special policy areas', the other being South Zeal Conservation Area protecting medieval Burgage Plot supported by a Character Appraisal at the link below.
https://www.dartmoor.gov.uk/_data/assets/pdf_file/0008/865457/South-Zeal-Appr-complete.pdf - Proposal 7.20 aims to protect the 'original core of Yelverton', yet the area it covers is not the original core, but large houses built in the 1930's, the same time as the

compliant and/or sound?: houses in Binkham Hill which are not in the area. - The original core of Yelverton was built in the 1820's around the Rock Hotel, 1840's around the Leg O' Mutton and 1850's around the Roborough Inn, all of which are outside the Special Policy Area. - This Special Policy Area is constraining the 'subdivision and development of typically large plots in this location', which is driving the need to develop green field and farmland sites in the area impacting many more residence and the wider community (Proposal 7.18 and 7.19 in Yelverton). - The Plan currently has two green-field sites proposed in Yelverton for new development, when only 'a small level of housing that provides for specific local needs' is required (reference Para 10.4 in the DLP Topic Paper 9 dated Dec 18). - There is no 'Development Site Brief' or Character Appraisal supporting this Proposal whilst there are briefs for other Proposals. Removal of this Special Policy could satisfy part of this need over the life of the 2018-2033 Plan, reducing the requirement to develop on green-field sites in Yelverton.

- Do you wish to participate in hearing session(s)?:
Yes, I wish to participate in hearing session(s)
- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:
My family home will be directly and significantly affected by Proposal 7.19 Land at Binkham Hill, Yelverton to provide 'affordable housing to meet identified local needs' by using farmland to build housing, whilst Proposal 7.20 Yelverton Special Policy Area seeks to protect houses of a similar age a few streets over for flawed reasons. In order to present a fair and balanced Local Plan that meets the aims to 'conserves and enhances the National Park's 'Special Qualities', and protects special areas and features within it from harmful development' and 'encourages redevelopment of vacant buildings or land, or other areas' this Special Policy Area needs to be reviewed, if required by public hearing.

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

My family home will be directly and significantly affected by Proposal 7.19 Land at Binkham Hill, Yelverton. I do not feel that the Local Plan has focused enough on Yelverton as a Local Centre and specifically its wider role as a gateway to the people of Plymouth. Specifically the Proposal 7.19 needs to be reviewed in the light of this wider role, the impact on the special qualities of Dartmoor and the Plan needs more clarity on how 'identified local needs' are established.