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Sent: 31 October 2019 11:48
To: Development Control <planning@dartmoor.gov.uk>; Forward Planning - mbx <forwardplanning@dartmoor.gov.uk>
Subject: Response to Local Plan Review on behalf of Sticklepath Parish Council

Dear Sir/Madam

Please find below comments on the Local Plan Review made by Sticklepath Parish Council.

The comments are based on an understanding that the Local Plan should be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

PC Comment on Plan	Reference to which draft LP Policy?	Why is it not sound?	What evidence is there?	How could it be remedied
New housing should have solar panels on roofs where feasible or other forms of achievable renewable energy infrastructure, including District Heating where feasible. In locations where there is no mains gas, there is a great opportunity to introduce wood pellet boilers or similar to discourage oil based heating systems. This should be coupled with high levels of insulation. The plan provides no measurable requirements for this approach so it is not effective in ensuring	Policy 3.8 (2) – Replacement Homes Policy 3.3 (2) – Housing in Local centres Policy 3.4 (2) – Housing in Rural settlements	It requires “a significant improvement in energy efficiency which could not be achieved by modification or adaptation of the existing dwelling” but is not specific and provides no measurable parameters. It is not therefore effective .	A fundamental principle of the NPPF’s environmental ambition is supporting a transition to the low carbon economy, through encouraging the reuse of existing resources and use of renewable resources (including renewable energy) to minimise our impact on climate change.	Inclusion of measurable objectives for energy efficiency and use of renewable energy

<p>new housing takes all available opportunities to reduce carbon emissions.</p>				
<p>The policy requires electric charging point per new dwelling with private parking. However, for communal parking areas (even where off street) this requirement drops to 5%. This appears far too low and given communal car parking is a common feature in residential development this will not deliver the required transition to a low carbon economy.</p>	<p>Policy 4.5 – Electric Vehicle charging points</p>	<p>It is not positively prepared on the basis it is not achieving sustainable development to the full extent needed.</p>	<p>A fundamental principle of the NPPF’s environmental ambition is supporting a transition to the low carbon economy, through encouraging the reuse of existing resources and use of renewable resources (including renewable energy) to minimise our impact on climate change.</p>	<p>The requirement for EVCP should be significantly increased from 5%.</p>
<p>The Housing strategy for Rural Settlements (which includes Sticklepath) is supported.</p>	<p>Policy 3.4 (2) Housing in Rural settlements</p>	<p>Na</p>	<p>It is considered a sound policy</p>	<p>Na</p>
<p>The policy protecting community services and facilities does not set down any specific timeframes for applicant’s to market a property and properly test the market. The Local Plan states:</p> <p><i>“The case for losing community services or facilities cannot be based upon the short term needs of an owner or tenant, or their current business model. The case must demonstrate a business or facility is not workable in the</i></p>	<p>Policy 4.1 – Supporting community services and facilities</p> <p>Policy 5.2 – development affecting Town Centres</p>	<p>The policies are not as effective as they could be. They doesn’t specify a timeframe for market testing for loss of community facilities and only specify 6 months for town centre uses, prior to any attempt at changing the use of such a facility.</p> <p>This could lead to confusion and anxiety in local communities.</p>	<p>The NPPF at paragraph 92 clearly sets out protection for community facilities stating <i>“planning policies should...guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;”</i></p>	<p>Adding a timeframe for at least 12 months market testing in both policies.</p>

long term by exploring the full range of potential uses or ways to operate it."

The emphasis here is on the long term, so we would welcome reference to at least 12 months of market testing before an application is made. This avoid ambiguity for applicants and the local community on what is expected.

The policy protecting town centres only specifies 6 months, which is insufficient time.

Thanks

Cllr Peter Grubb (on behalf of Sticklepath Parish Council)