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**Strategic Planning**  
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31 October 2019

Dear Sir/Madam

**RE: Dartmoor Local Plan: Final Draft Consultation (Regulation 19)**

Thank you for the opportunity to comment on the Dartmoor Local Plan: Final draft consultation.

Appendix A attached provides the County Council's detailed comments on the Local Plan including general comments regarding the strategy, environmental matters, housing and minerals, waste and energy.

Appendix B sets out the County Council's education comments.

The County Council would be pleased to discuss the comments raised and actions arising in more detail.

We look forward to continuing our work with you as the Local Plan progresses and would like to attend the relevant Examination Hearings in due course.

Yours faithfully,

Mike Deaton

**Chief Planner**

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## Dartmoor Local Plan: Final Draft Consultation (Regulation 19)

### Appendix A: General comments

Section/paragraph	Issue and reference point	Comments
<b>1 Vision, spatial strategy, and planning applications</b>		
	Strategy: Minerals	Major development is formally defined as winning and working of <b>minerals</b> ; <b>waste development</b> ; development of 10 dwelling houses or more; a building (s) of more than 1,000 square metres of floor space; or development carried out on a site of 1ha or more. The current wording could be interpreted as meaning that development of this scale would be unlikely and needs to be considered in the context of the potential scale of some of the allocations and the extant planning application for the extension to Linhay Quarry.
Strategic Policy 1.2 (2)	Sustainable development in Dartmoor National Park	Point 1.g) refers to conserving the quality and quantity of natural resources. In some cases, there will also be a need to make efficient use of such resources, e.g. minerals. The plan would be improved by adding a new point to address this e.g.: ' <i>will ensure the efficient use of natural resources</i> '
<b>2 Environment</b>		
2.3	Biodiversity and geodiversity	The NPPF defines Green Infrastructure as having multi-purpose environmental outcomes/benefits. This does not appear to be mentioned directly in the Plan. It would be helpful to mention the potential to both conserve and enhance access to aspects of the NP's heritage by seeking to incorporate heritage assets within green infrastructure. The historic environment is also receiving increasing attention for the contribution that access to it can make to the physical and mental wellbeing agenda. These linkages could be brought out more strongly.
Strategic Policy 2.3 (1)	Biodiversity net gain	On and off-site mitigation measures can sometimes have negative impacts on landscape character and the historic environment. The plan should ensure that these impacts are considered in the context of wider development impact as a whole.
2.6.2 and 2.6.3	Conserving and enhancing heritage assets and understanding significance	By virtue of the NP's designation, some non-designated heritage assets may have a much higher significance here, and therefore be given greater weight in planning, than a comparable asset outside the NP. This elevated significance should be recognised in the plan.
2.6.8	Conservation Areas	Conservation Areas, in addition to having built historic environment value, are also likely to have high potential for the survival of historic archaeology (evidence of medieval and post-medieval settlement evidence). This should be mentioned.
2.7	Water environment	This section is generally based on the Flood Zones but would benefit from wider consideration of all local sources of flood risk such as surface water and groundwater (these are excluded from the Flood Zone mapping).



		<p>It would also be beneficial to include reference to the County Council as the Lead Local Flood Authority (LLFA), responsible for managing local flood risk from surface water, groundwater and ordinary watercourses. For context, the surface water flood map has been developed for Devon. This dataset indicates the surface water data that best represents local conditions and was reviewed, discussed and agreed between the LLFA, Environment Agency and other local partners. It is to be used alongside the existing Environment Agency Flood Zone Maps by Local Planning Authorities in the planning process.</p> <p>The section on Sustainable Drainage Systems (SuDS) and their role in the planning process is helpful and appropriately includes reference to DCC's SuDS guidance. It would be beneficial to support this further with an explanation of DCC's role as a statutory consultee for major developments which have surface water drainage implications.</p>
<b>3 Housing</b>		
Policy 3.11 (2)	Gypsy and Traveller Accommodation	The gypsy and traveller accommodation assessment identifies the need for 3 pitches during the Local Plan period. The plan does not allocate sites for this provision, rather it relies on a criteria-based policy to manage the delivery of pitches. Further evidence should be provided to demonstrate that this approach will deliver the provision required going forward.
<b>6 Minerals, waste and energy</b>		
Strategic Policy 6.1 (2) and 6.2 (2)	New or extended minerals operations and minimising the impacts of minerals operations	The consideration of wider need (outside the NP) for certain minerals is supported. Provision of sufficient building stone for conservation purposes, where re-use of materials is not possible, is very important. However, it would be appropriate to be clearer in Strategic Policy 6.1 and 6.2 that 'local need' can relate to the supply of conservation materials for use outside as well as inside the NP (where the need is proven, and impact is managed).
6.1.11	Safeguarding Dartmoor's mineral resource	Paragraph 6.1.11 lists the Minerals Safeguarding Areas, but the Policies Map also shows Minerals Safeguarding Areas in the vicinity of Lee Moor that are not mentioned in the list, and this discrepancy should be addressed.
<b>7 Towns, villages and development sites</b>		
Various paragraphs	Allocation scale	This revised draft of the plan now includes the development scale (particularly number of dwellings) in the policies for the majority of the allocations. It is noted however that Proposal 7.4 (2) Land at Chuley Road does not include the potential number of dwellings. It would assist in infrastructure planning, particularly regarding local education provision, if the number of dwellings proposed were included.
Various policies	Policy maps	As a national designation, Scheduled Monuments should be included within the policy maps where relevant.
7.22 (2)	Land off Warren Road (Mary Tavy)	It is understood that it is a local aspiration to relocate the primary school. Therefore, although Devon County Council does not currently have funding for the project, it understands the inclusion of this policy within the new Local Plan. Allocation of the site for the relocation of the primary school would put the school and community in a stronger position should funding become available in the future.

## Appendix B:

Where the development proposed exceeds the forecast capacity of schools, relevant information has been set out below. This considers the forecast spare capacity, relates this to the number of dwellings proposed in the area and identifies requirements. Where a development proposal is not stated below, there is forecast to be sufficient capacity to mitigate development impact.

In addition to primary and secondary school capacity, consideration has also been given to the impact of development on Special Educational Needs (SEN) and early years provision. It is not expected that the level of development will be sufficient to require contributions towards SEN provision in accordance with the DCC's Education Infrastructure Plan, however if development proposed did meet the threshold, a contribution would be requested. With regards to early years provision, contributions may be requested from development when there is insufficient provision in the area.

School	Net capacity (places) at 2019	Projected NOR primary = spring 2023 Secondary = spring 2025	Spare capacity
<b>Primary</b>			
Ashburton	189	201.75	-12.75
Meavy	112	111.25	0.75
<b>Secondary</b>			
Okehampton	1466	1704.42	-238.42

Area	Sites	School	Number of houses which could be supported by forecast capacity
Ashburton	Land at Longstone Cross (40 homes)	Ashburton Primary	0
	Land at Chuley Road (mixed use)		
Yelverton	Land at Elfordtown (40 homes)	Meavy Primary	3
Chagford	Land at Lamb Park (36 homes)	Okehampton College	0

### Ashburton Primary School

Ashburton Primary has no forecast spare capacity. No development can be accommodated in the existing capacity of the school which would require either the expansion or potential relocation of the primary school which would need to be funded by development. The school is on a constrained site making it difficult to expand and at present there is no funding stream to support the relocation of the school and it is considered unlikely that the development sites proposed in the Local Plan will be able to financially support its relocation. The County Council is working with local schools to put in place a strategy to accommodate pupils from new development. This could include some expansion on site where possible, additional provision at another local school or



transport to existing schools. Therefore contributions from development will be required towards the future expansion of the existing school and / or transport to a school with capacity to support additional pupils.

**Meavy C of E Primary School**

Meavy Primary School has a forecast spare capacity of 0.75 primary pupils – amounting to capacity for 3 dwellings. As the number of pupils from the planned scale of development exceeds the spare capacity there would need to be an increase in capacity within the area. The school is on a constrained site so has limited opportunities to expand however, if necessary, it may be possible to deliver a small expansion. Alternatively, it may be possible to amend the designated areas of Meavy Primary and other local schools and provide a small expansion delivered at a nearby school to accommodate the change in designated areas and secure additional capacity to meet the need generated by development.

**Okehampton College**

Okehampton College has no spare forecast capacity. A scheme has been completed to relocate the post-16 provision to create 125 additional secondary school places on the site. Further expansion will be needed to accommodate development proposed in the designated area and should be considered alongside development proposed in the Plymouth and SW Devon Joint Local Plan. Developer contributions will be requested from development towards secondary infrastructure.