

Local Plan Review  
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Direct Line: 

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Dear Forward Planning Team,

### **Dartmoor National Park Local Plan Review: FINAL DRAFT CONSULTATION – REGULATION 19**

Highways England welcomes the opportunity to comment on the Dartmoor National Park Local Plan Review (LPR) Final Draft Consultation. This Regulation 19 consultation forms part of the Dartmoor National Park Local Plan review process which seeks to extend the period of the Plan up to 2036. Submission and Examination of the Plan is scheduled for 2020 with Adoption anticipated in 2021.

Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Dartmoor National Park Local Plan area comprises a stretch of the A30 in the north and the A38 in the south and east. It is on the basis of these responsibilities that we provide the comments that follow in this letter.

### **Highways England's Role in the Local Plan Process**

Highways England recognises that prosperity depends on our roads, so aims to support growth and facilitate development based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. To constructively engage in the local plan-making process, we require a robust evidence-base for consideration so that sound advice can be given to local planning authorities on the appropriateness of proposed development in relation to the SRN. This also extends to include the identification of transport solutions that may be required to mitigate adverse impact on the SRN and hence support potential site allocations.

Highways England is keen to ensure that transport and land use planning policy is closely integrated. In this respect, Highways England draws your attention to 'The Strategic Road Network - Planning for The Future' which acts as a guide to working with Highways England. DfT Circular 02/2013 also sets out how we will engage with the planning system to deliver sustainable development.

Paragraph 12 of Circular 02/2013 states that *'the preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion'*.

Paragraph 18 states that *'capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements'*.

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and NPPG. We acknowledge that, at this stage of the Local Plan review process, stakeholder's views on the suitability of the Draft Policies for distributing and managing future development are being sought.

## **The Current Local Plan**

The existing Dartmoor National Park Local Plan First Review 1995-2011 was adopted in August 2004 and currently provides detailed local planning policies for the National Park. The Plan and its policies were 'saved' under The Planning and Compulsory Purchase Act 2004 however some of these policies were replaced by policies in the adopted Core Strategy (2008), Development Management & Delivery DPD (2013) and Minerals & Waste Plan (2004). The adopted Core Strategy which covers the period 2006-2026 aimed to deliver around 50 homes per year during the period, and delivery to date has been in line with this.

## **Previous Plan review consultation responses**

We previously responded to your First Draft (Regulation 18) Consultation in March 2019. In this response we provided specific comments in respect of the need for the Plan to be supported by a robust evidence base to identify the impact of the proposed development, and where necessary, that appropriate mitigation is signposted within the Plan Policies. We also recognised the requirement to identify the quantum of development proposed in the Plan settlements together with clarity regarding the total quantum of development expected over the Plan period, which is discussed later in this response.

It is noted that following the Regulation 18 Consultation the Plan period has been extended from 2033 to 2036 to provide 15 years post adoption to better enable delivery of housing need.

## **Spatial Strategy**

Draft Strategic Policy 3.1 (2) 'Meeting Housing Need in Dartmoor National Park' sets out that the Local Plan will seek to meet an indicative housing delivery figure of 65 homes each year post-adoption across the National Park over the period of this Plan, up to a total of 1,125, as below:



	A: Homes Required under existing Plan 2018-2020 (50/year)	B: Homes Required once emerging Plan adopted 2021-2036 (65/ year)	C: Total Homes needed (=A + B)
Local Centres	90	585	675
Rural Settlements	38	244	282
Villages & Hamlets	15	97	112
<b>Settlements</b>	<b>143</b>	<b>926</b>	<b>1,069</b>
Open Countryside	7	49	56
<b>Total</b>	<b>150</b>	<b>975</b>	<b>1,125</b>

Draft Strategic Policy 1.4 (2) 'Spatial Strategy' proposes specific site allocations for residential development in line with the below hierarchy, which is guided, in part, by the restrictions on the provision of new development and infrastructure within the National Park boundary:

- 8 Local Centres
- 16 Rural Settlements
- 18 Villages & Hamlets
- Outside classified settlements

As requested in our response to the Regulation 18 Consultation, the draft Local Plan now sets out, where proposed, specific housing allocations by settlement, under a series of Plan 'Proposals'. Growth will be supported at existing local centres and rural settlements with limited housing (restricted to affordable dwellings) being permitted at villages, hamlets and outside classified settlements. The quantum of new specific housing allocations proposed across the Plan Period is set out below:

Site	Settlement	Units
Longstone Cross	Ashburton	40
Chuley Rd	Ashburton	45
Axminster Carpets	Buckfast	40
Barn Park	Buckfastleigh	26
Holne Road	Buckfastleigh	28
Lamb Park	Chagford	36
New Park	Horrabridge	35
Thompsons (Station Rd)	Moretonhampstead	26
Forder Farm (Chagford Cross)	Moretonhampstead	25
Betton Way	Moretonhampstead	18
Adj Fairfield	South Brent	36
Palstone Lane b	South Brent	34
Palstone Lane a	South Brent	15

Binkham Hill	Yelverton	41
Elfordtown	Yelverton	40
<b>Total</b>		<b>485</b>

The aim of the Local Plan's spatial strategy is to focus development opportunities in the most sustainable locations, and where it relates well to existing development, which is intended to reduce the reliance on the private car. The plan therefore seeks to focus development in existing settlements to ensure access to existing roads and amenities, and where housing or employment premises relate well to existing development, which is set out in 'Topic Paper 7 – Transport' (Version 3, September 2019). This aligns with Paragraph 16 of the DfT Circular 02/2013), which recommends development be '*promoted in locations that are or can be made sustainable, that allow for the uptake of sustainable transport modes*'. This should include locations with good access to transport modes that can substitute travel by private car, when considering the commuting locations that would otherwise travel via the SRN.

In terms of location, employment development often contributes significantly to peak hour traffic, and hence there can be challenges to accommodating high levels of trip demand, which may only exist for limited periods of the day. As above, the location of employment sites is as important to Highways England as the location of housing sites as growth should be targeted at sustainable sites to reduce any imbalance between population and jobs and avoid additional trips on the SRN as a result of out-commuting. Highways England therefore welcomes the Plan's preference for the allocation of small scale employment broadly in line with the settlement hierarchy of residential allocations.

## Transport Impacts

### Plan Policy

Draft Plan Policy 4.3 (2) 'Enabling sustainable transport' sets out that all new development will be required to encourage and enable sustainable travel and be supported by an appropriate level of transport survey and assessment to inform the decision-making process. The supporting Plan text highlights the need to reduce the need to travel, allow contributions from new development to help address existing transport issues and improve sustainable access and viability of public transport services. Whilst the growth set out in the draft Plan is likely to result in additional trips using the SRN, based on the proposed scale and distribution of this growth, and the strategies set out within the Plan's Policies, we are satisfied that the impact of the allocations within the Plan is unlikely to result in an adverse impact on the safe and efficient operation of the SRN, and that further detailed assessment is not required. Should the proposed level of development increase beyond that as currently set out in the Plan, Highways England will require that further assessment is undertaken.

## Conclusion

We have set out above our high-level considerations in respect of the Dartmoor National Park Local Plan Review Final Draft Consultation. The Plan aims to deliver 1,125 homes, or 65 per year across the period of the Plan, based on a spatial strategy which prioritises growth at existing local centres and rural settlements, with limited growth being permitted at villages and hamlets and in locations outside classified settlements.



Development should be promoted at locations that are, or can be made, sustainable allowing and encouraging the uptake of sustainable transport modes, which is reflected within the Draft Policies contained within the Plan. The planning of adequate local highway infrastructure to provide for local movements should be an integral part of the transport strategy, thereby maximising the ability of the SRN to serve its primary function in supporting the strategic movement of people and freight. Highways England is satisfied that the proposed Plan growth, underpinned by policies which seek to direct growth towards sustainable locations and reduce the reliance on the private car, can be accommodated without the requirement for transport mitigation on the SRN.

We trust that our response will be helpful and assist you with your Local Plan review. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,

*Sally Parish*

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