

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 *	Ed							
Surname *	Persse							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident	<input type="checkbox"/>	An agent	<input checked="" type="checkbox"/>	A Town / Parish Council	<input type="checkbox"/>	An organisation	<input type="checkbox"/>
	A business	<input type="checkbox"/>	A visitor	<input type="checkbox"/>	A statutory agency	<input type="checkbox"/>	Other (specify below)	<input type="checkbox"/>
Other								
Job title (where relevant)	Planning Consultant							
Organisation (where relevant)	EJFP Planning Ltd							
On behalf of (where relevant)	Hon. Andrew Lopes							
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>				

* 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.

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I would like to be added to the Local Plan consultee list

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)	3.3.1 to 3.3.3
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) Legally compliant	X	
ii) Sound	X	
iii) Compliant with the Duty to co-operate	X	

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.

The inclusion of the definition of a local person is welcome and such a definition will assist in providing homes for those people who have a genuine connection with the National Park.

Furthermore, the definition is sufficiently flexible to take into account numerous circumstances.

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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.

[Additional space on final page]

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.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	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.

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 [signing up to our Local Plan consultee list](#), and following us on Twitter [@DartmoorPlan](#) and Facebook [/DartmoorPlan](#)

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)	5.1(2)
Policies Map	

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	x	
iii) 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.

Welcome the changes to criterion 3 which now includes tourism development.

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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.

[Additional space on final page]

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.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

x	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.

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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)	5.4(2)
Policies Map	

- 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		X
iii)	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.

Concerns relating to the restrictive nature of the requirements set out in criterion 4(c) of the policy.

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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.

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In terms of criterion 4 (c) it is considered that there should be greater flexibility, such dwellings will not always be located that is conducive to occupation as an affordable dwelling. Therefore, the policy should also consider commuted sums and local occupancy.

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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.

5. 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)	X	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.

To discuss the points made in this representation

PART E - Additional Comment (3)

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

Paragraph (enter number, e.g. 4.5.1)	5.4.11
Policy (enter number, e.g. 4.5)	5.6(2)
Policies Map	

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		X
iii) 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.

Policy 5.6(2) 2 a seems to be a retrograde step in light of DMD44 and the acceptance of pods, shepherd huts and other similar structures in rural areas under DMD44. It is considered that there is an opportunity for high quality and innovate structures to be assimilated into the landscape in villages/hamlets and the open countryside which will have limited impact on the landscape yet be beneficial in terms of providing high quality and unique tourist accommodation with the National Park boundary. This would have a benefit on the local economy and those traders etc. within the park. Additionally, high quality/unique/bespoke holiday accommodation that is thoughtfully and considerately sited is likely to have less of an impact on the adjoining landscape than tents.

Concerns are also raised in relation to the point made in paragraph 5.4.11 that the long-term siting of holiday accommodation such as yurts does not contribute to the local economy. This is clearly not correct, such holiday lets do contribute to the local economy and to say that they do not is simply incorrect.

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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.

The policy is suggested to be amended as follows;

2(c) for a new building is met through the conversion of a redundant building, and suitable historic buildings are used first in accordance with strategic policy 2.7; or the provision of high-quality/Bespoke/unique structures for holiday accommodation which are assimilated into the landscape; and

Other National Parks support the following preamble is found in the North Yorks Moor National Park Plan

Policy UE1 is intended to cover traditional camping (though not caravans) and also newer forms of non-permanent tourist accommodation, where accommodation that is fabricated off site and can be easily removed without harm to the landscape but which is likely to still form a long lasting but reversible form of development. This policy also applies to new types of 'glamping' or alternative and distinctive types of accommodation (pods, yurts, teepees, shepherd huts etc.) that have evolved in response to a quickly changing market, and which can support an existing rural business, farm or estate. It applies across the whole of the National Park, thereby allowing for low impact, non-permanent sustainable schemes to come forward across the National Park.

Thus other Parks have understood and appreciated the ever-changing tourism market and adapted their policy so as to cater for this fact. It is therefore, suggested that the DNPA adopt a similar policy stance as outlined above.

Furthermore, should the DNPA accept the above for inclusion in this policy, it is considered such structures should not be subject to the 28 day rule as suggested in paragraph 5.4.11 and criterion 3(b). While such a restriction is suitable and justified for touring caravan and tent, it is not for the suggested high quality bespoke/unique/accommodation suggested.

Paragraph 5.4.11 needs amendment such that it confirms that holiday lets as yurts do contribute to the local economy and this should be recognised in the Local Plan. Furthermore, the recent Glover Report recognises the benefits of tourism and the positive impact this sector has on the local economy.

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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.

5. 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)	X	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.

To discuss the points made in this representation

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)	3.6(2)
Policies Map	

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		x
iii) 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.

The policy as written is too restrictive and should have greater flexibility. The main concern comes with criteria 2(a) and 2(b).

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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.

The policy should be amended in relation to criterion 2(a) to reflect the guidance set out in the nationally described space standards. This would give greater clarity and flexibility to the provision of affordable housing; this flexibility will ensure that the identified need for settlements can be met and not shoehorned into the current inflexible approach currently proposed.

In terms of criterion 2(b) it is not clear why the 93m² is required or justified in relation to self-build or custom build local person housing. To qualify for local person occupation there is no requirement to be in housing need, in addition the pre-ambles to the policy states at paragraph

3.7.2 that *Homes are tailored to the needs of the occupant, meaning also they are more likely to stay in the home and the community for longer.* The policy does not reflect the guidance and unduly restricts without justification the size of these dwellings. It is therefore considered that the restrictions set out in criterion 2(b) should be removed. If it considered that there is a need for restrictions, then these should be more reflective of open market standards.

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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.

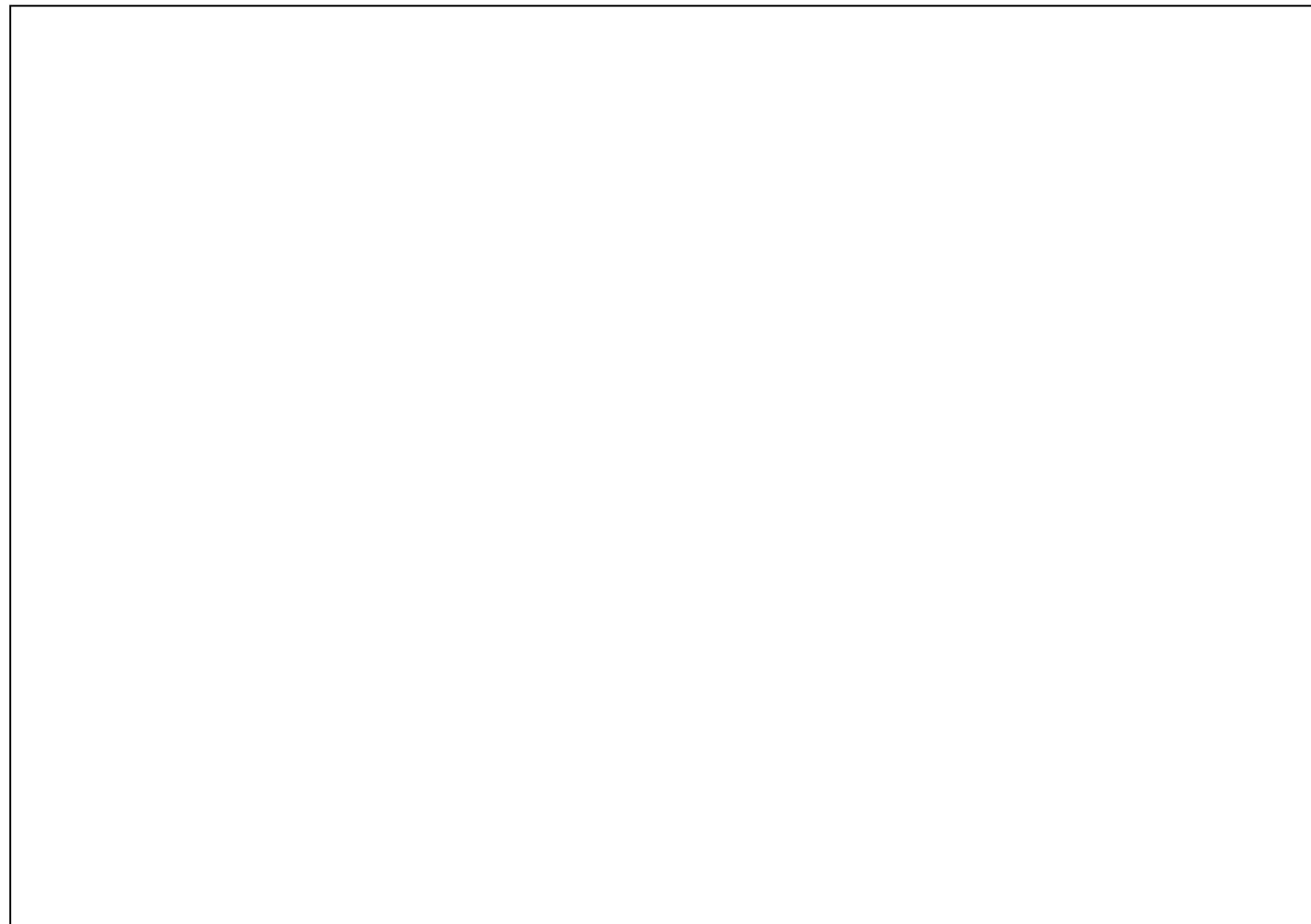
5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	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.

To expand on the points made above

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:

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Parke, Bovey Tracey, Devon, TQ13 9JQ
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Email: forwardplanning@dartmoor.gov.uk