

## **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 1<sup>st</sup> 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](http://www.dartmoor.gov.uk/localplanreview).

### **PART A - About You**

Personal details

First name *	Iestyn						
Surname *	John						
Address	[REDACTED]						
Post code	[REDACTED]						
Email address *	[REDACTED]						
I am completing this form as (choose one)	A resident		An agent	X	A Town / Parish Council		An organisation
	A business		A visitor		A statutory agency		Other (specify below)
Other							
Job title (where relevant)	Partner						
Organisation (where relevant)	Town planning consultants						
On behalf of (where relevant)	Buckfast Abbey Trustees						
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes		No	X			

\* 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.

☐ 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](mailto:forwardplanning@dartmoor.gov.uk).

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)	1.4(2) Spatial Strategy
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	<b>Yes</b>	<b>No</b>
<b>i)</b> Legally compliant	<b>Yes</b>	
<b>ii)</b> Sound	<b>Yes</b>	
<b>iii)</b> 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 1.4(2) provides a positive and clear statement on the spatial approach to be taken towards development in the Park and in relation to the national approach towards development in National Park area.

We strongly support South Brent being identified as a Local Centre within Policy 1.4(2). This is wholly appropriate given its size and range of facilities and its' location relative to other Park settlements.

The approach being advocated in the draft policy will set out clear guidelines for future development with the tiered focus meaning that development, where needed, will be concentrated in the most sustainable settlements but without excluding smaller settlements from being able to meet their own lower levels of need. We note that the policy provides for a modest increase in the level of development in Local Centres when compared to the approach established in the current local plan. This is welcome as some extra provision is needed to help address the demographic and economic challenges facing Park communities, as set out in other parts of the draft Local Plan. Given the important role Local Centres play within the Park, we especially support the priority being given within the draft policy to enhancing services in these settlements in order to meet their needs and those of their hinterlands.

In summary, it considered that the approach set out in Policy 1.4(2) will help to ensure that the Park can protect its environment whilst also meeting the social and economic needs of its communities, as required under relevant legislation for the National Park.

[Additional space on final page]

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	<b>No</b> , I do not wish to participate in hearing session(s)	<b>Yes</b> , 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)	4.1.2
Policy (enter number, e.g. 4.5)	Policy 4.1(2) Supporting community services
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	<b>Yes</b>	<b>No</b>
i) Legally compliant	Yes	
ii) Sound	Yes	
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 4.1(2) seeks to protect all community facilities. Development of these will only be allowed where the existing facility is not viable or where equivalent provision is provided elsewhere. It adds that "within or adjoining" classified settlements provision of "new or extended" community facilities will be supported.

Supporting paragraph 4.1.2 notes that community facilities will include, amongst other things, community halls and places of worship.

It is considered that this policy is sound, robust and in accordance with national policy for development in national parks especially with regard to the duty to protect the economic and social well being of communities within those areas. It is therefore important that a strong presumption is set out to protect these uses and ensure their re-provision where necessary. It is appropriate for the policy to allow for the provision of new facilities and that these be allowable on land adjacent to, as well as within, existing communities. Allowing this additional flexibility will help to optimise the potential benefits which can accrue from new or replacement facilities, for example in relation to their locational accessibility (for example to highway or other connections) and space necessary to allow the provider maximise the utility of their community facility. Edge of settlement locations will still provide good access for users not only to residents of the settlement in question but for those living in the wider hinterland - an issue of particular relevance to Dartmoor given the extent of its rural population - and where access to alternative provision is otherwise likely to be hard to come by. It is therefore essential that this policy retain the flexibility for new and replacement community facilities to be provided in and adjacent to existing settlements.

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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.

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X	<b>No</b> , I do not wish to participate in hearing session(s)		<b>Yes</b> , 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.

**If you require help, or would like to receive this form in an alternative format, please contact the Forward Planning team:**

Forward Planning, Dartmoor National Park Authority  
Parke, Bovey Tracey, Devon, TQ13 9JQ

Tel: 01626 832093  
Email: [forwardplanning@dartmoor.gov.uk](mailto:forwardplanning@dartmoor.gov.uk)  
Website: [dartmoor.gov.uk/localplanreview](http://dartmoor.gov.uk/localplanreview)

Dear Sir/Madam

Bell Cornwell LLP act on behalf of Buckfast Abbey Trustees in relation to a number of their interests in the Dartmoor area. In this capacity, we have been asked to provide some representations on certain aspects of the draft plan and we therefore have pleasure in attaching a completed representations form to that effect.

Please note that this submission is made independently to those which will be made with regard to the Trustees' very specific interests at the Buckfast Spinning Mill site, details of which will be subject to a separate submission.

We would be grateful if you could provide confirm receipt of these comments. If you have any queries please do not hesitate to contact us.

Yours sincerely

Iestyn John

**Iestyn John**

BA(Hons) MA MRTPI

**Partner**

| [bell-cornwell.co.uk](http://bell-cornwell.co.uk)



Clear, realistic advice  
with  
a personalised service

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Unit 2 Capital Court, Bittern Road, Exeter, Devon EX2 7FW  
Also at Amersham, Hook and London



A full list of partners can be found on our website: [www.bell-cornwell.co.uk](http://www.bell-cornwell.co.uk)  
Bell Cornwell LLP registered in England & Wales number: OC340551