



DARTMOOR LOCAL PLAN
guiding planning applications in Dartmoor National Park

Dartmoor Local Plan Review

Summary of responses to Regulation 18 consultation

This document summarises the comments received on the Regulation 18 draft Local Plan. All comments received during the consultation have been read, logged, and are being considered. This document provides an overview of the responses and it may not be possible to see individual comments. You will be able to see in the next draft of the Local Plan (regulation 19) whether/how your comments have led to changes in the Plan.

Thank you to everyone who took the time to submit comments, and we hope you will continue to stay involved and comment further.

April 2019



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1 Introduction

- 1.1.1 The Regulation 18 draft Local Plan for Dartmoor was the first formal step in the review of Dartmoor National Park Authority's (DNPA) Local Plan which will in time replace Dartmoor's current adopted local plan: the Core Strategy (2008) and Development Management and Delivery DPD (2013). The consultation follows a previous Issues Consultation¹ which informed the preparation of draft policies. The draft Local Plan was published on 3 December 2018, and the public consultation period ran from this date until 4 February 2019.



Figure 1 – Cover of First Draft (regulation 18) Dartmoor Local Plan 2018 - 2033

- 1.1.2 The draft Local Plan was published on DNPA's website², and hard copies were available at Parish and Town Council offices, libraries, visitor centres and Local Authority headquarters. Consultation was undertaken in line with the Adopted Statement of Community Involvement³.
- 1.1.3 Consultees were asked to consider the following questions when reading the plan and preparing a response:
1. Do the policies respond to the right issues? Do they respond appropriately? Have we missed anything?
 2. Is the scope of each chapter correct?
 3. Are there any policies you particularly support, and why?
 4. Are there any policies you would like to see change? If so, why and how?
 5. Do you consider the Plan to be 'sound'?
- a) Government guidance states that to be adopted, a plan must be deemed 'sound'. According to the National Planning Policy Framework⁴ (2018), plans are 'sound' if they are:
 - b) 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;

¹ http://www.dartmoor.gov.uk/__data/assets/pdf_file/0009/957150/2017-04-19_Issues_Consultation_Response_SummaryV2.pdf

² www.dartmoor.gov.uk/localplanreview

³ http://www.dartmoor.gov.uk/__data/assets/pdf_file/0007/948589/SCI-PUBLISHED.pdf

⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- c) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- d) 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;
- e) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework

1.1.4 The consultation was public and open to everyone, respondents included residents, community groups, visitors and businesses, as well as developers, architects, planning agents, government organisations and others. There were 158 respondents and 917 comments submitted. Figures 2 and 3 summarise the type of people and organisations that responded and how many comments were received against different parts of the Local Plan.

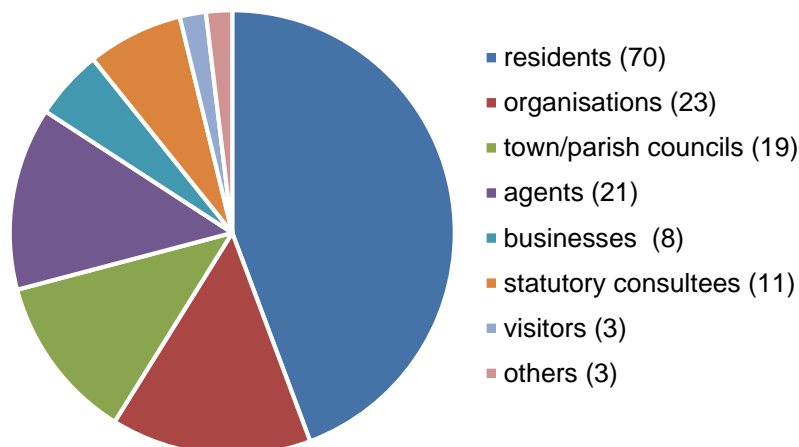


Figure 2 – Summary of the type of people and organisations that responded

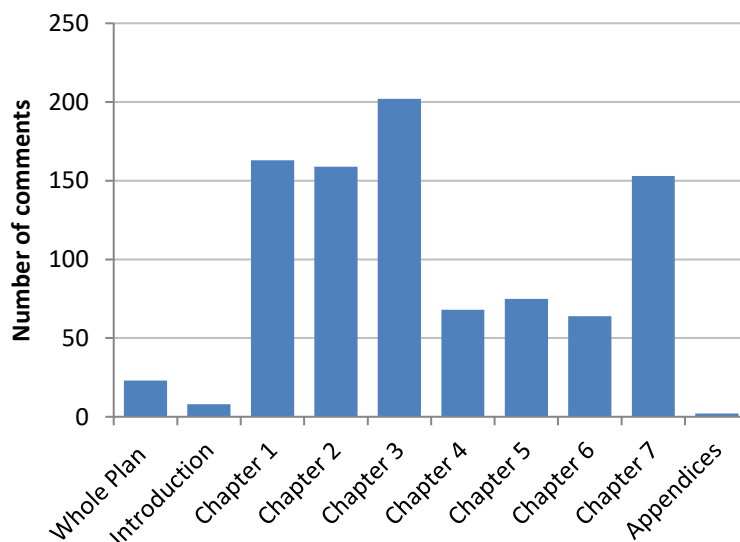


Figure 3 – Number of comments received against parts of the Local Plan

1.1.5 We ran a number of outreach events to help publicise the consultation and encourage discussion of Local Plan policies and the issues they try to address. This included:

Four drop-in events where the public could talk openly with planning officers at the following locations:

1. Ashburton Christmas Fair: 6th December 2018 1600 - 2100
2. Yelverton War Memorial Hall: 11th December 2018 1500 - 1800

3. Whiddon Down: 13th December 2018 1500 - 1800
4. Moretonhampstead: 18th December 1500 - 1800

Five workshops where specific stakeholders from relevant organisations were invited to discuss topic areas:

1. Parish Council workshop: Meeting room, Parke 5th December 1400 – 1600
2. Environment workshop: Meeting room, Parke 15th January 2019 0900 – 1230
3. Farming workshop: Meeting room, Parke 17th January 2018 1030 – 1330
4. Housing workshop: Meeting room, Parke 21st January 2018 0900 – 1230
5. Economy workshop: cancelled due to low demand

2 Consultation responses

2.1 Overall

- 2.1.1 Many respondents commended the language and design of the first draft, recognising that it is more succinct, clearly structured and an improvement on existing documents which should prove easier to work with. Diagrammatical summaries were welcomed in particular.

2.2 Introduction

- 2.2.1 There was general support for the introduction and that it provided a friendly introduction to how to understand and use the Local Plan. There was some concern that strategic and non-strategic policies were not properly defined and that the Authority's socio-economic duty was not given sufficient prominence.

2.3 Chapter 1: Vision, spatial strategy and planning applications

Policy or section	Summary of responses
Policy 1.1(1) Delivering National Park purposes and protecting Dartmoor's Special Qualities	Strong general support for this policy and the prominence of the Sandford principle in resolving conflicts between National Park purposes. Respondents asked for stronger language, emphasising the duty should not be pursued in conflict with the purposes.
Special Qualities	General support for the special qualities listed. Individual respondents asking for the Special Qualities to also recognise; Dartmoor's woodlands and traditional woodland management, its capacity to provide spiritual refreshment to visitors and provide flood attenuation services to downstream areas outside the National Park boundary.
The Vision	Seven respondents commented directly. General support for the Vision. It was suggested the vision could be more ambitious in seeking environmental enhancement, not just conservation. Other comments included it should also refer to infrastructure provision to support communities and businesses, the importance of woodland and use of locally sourced timber in construction, and that the historic environment should be given more prominence.
Policy 1.2 (1) Sustainable Development in Dartmoor National Park	20 comments received. Many respondents supported the principle of the policy, and provided detailed comments about the wording and criteria, including <ul style="list-style-type: none"> • the policy wording is too dictatorial and it's unrealistic to expect all development to meet all the criteria • the criteria should include the strategic requirement to meet local affordable housing needs

	<ul style="list-style-type: none"> • there are insufficient safeguards to protect Dartmoor from recreational harm • that the policies could be more ambitious in tackling current sustainability issues, including meeting emission targets and delivering environmental enhancement • doubt that compliance with the policy criteria would deliver development which is environmentally sustainable • that certain objectives should be prioritised over others • more commitment to requiring SuDS to deliver additional water attenuation • amend or add the following sustainable development goals: 'conserve and enhance natural resources', 'reduce flood risk' and 'ensure efficient use of natural resources',
Policy 1.3(1) Presumption in favour of sustainable development	Few direct comments on this policy, no objections. Two respondents recommended that a presumption in favour of development to meet local affordable housing needs should be introduced.
Policy 1.4(1) Spatial strategy	<p>38 comments received. Full support for the principle that development is better directed at sustainable and well-serviced settlements. Strong support for the new three-tier settlement hierarchy. Specific comments on the categorisation of settlements included in the hierarchy. Other comments included:</p> <ul style="list-style-type: none"> • potential for confusion between settlement type names, suggested that many would consider Villages and Hamlets to be Rural Settlements • concern that the Local Plan does not take into consideration the impact of housing growth outside the National Park and the likely impacts of visitors from these developments • that the amount of development to be delivered in each Local Centre should be set out in the Local Plan • Local Centres should deliver a higher proportion of the indicative housing number • Some, more sustainable, Local Centres should deliver more housing than others • business development in the open countryside should prioritise use of existing building and previously developed land. • policy wording to support employment development is inconsistent throughout the policy • other settlements suggested for inclusion in the settlement hierarchy: Hexworthy, Wrangaton, Teign Village, Buckland-in-the-Moor, Docombe, Gidleigh, Harford, Haytor Vale, Leusdon, Murchington, Poundsgate, Sigford, Higher Brimley and Sampford Spiney
Policy 1.5(1) Major Development in Dartmoor National Park	13 comments received. There was widespread confusion over the national definition of major development for the purposes of this policy, particularly whether the definition of major is the statutory definition or a judgement of what is major in the context of Dartmoor. Many respondents had mistaken the definition of Major Development to be the statutory GDPO ⁵ definition (i.e. 10 dwellings or more etc.). Many respondents requested for the language to be revised, and the definition of major development and the exceptional circumstances to be made clearer. Several respondents felt it was appropriate to assess the development's impact on special qualities when determining whether it was major. Several commenters identified the definition in the glossary did not align with that in the policy preamble.

⁵ http://www.legislation.gov.uk/ukxi/2015/595/pdfs/ukxi_20150595_en.pdf

Policy 1.6(1) Delivering good design	<p>Respondents generally commented that this section was worded well and supported its aspirations. Comments included:</p> <ul style="list-style-type: none"> • provide clarification on how density is maximised whilst maintaining urban grain • policy should also include environmental features of good design and reference biodiversity enhancement policy • consider recognising the significance of more modern buildings • more emphasis on design for the prevention of crime and disorder • both support and objection to the inclusion of corrugated metal sheeting , and concern that this could be confused with modern profile metal sheeting • concern that the Design Guide SPD has led to a monoculture of white rendered houses and dissuaded creative design solutions and materials • concern that policy wording wrongly elevates the status of the Design Guide SPD • requests for a requirement for the use of local construction materials, particularly granite and timber, to support local economies and ensure consistency in appearance
Policy 1.7(1) Sustainable construction	<p>Strong support for this policy. Comments included:</p> <ul style="list-style-type: none"> • should be reworded so that reduction of consumption and fossil fuels are the primary aims, not just carbon emissions alone. • particular support for encouraging a fabric-first approach, over renewable energy generation • request that improved efficiency should be required, rather than encouraged
Policy 1.8(1) Protecting local amenity in Dartmoor National Park	<p>6 comments received. Support expressed, but with recommendations for further detail with regards:</p> <ul style="list-style-type: none"> • wood burners and their impact on air quality • ensure proper consideration of highway safety, • enhancement of local amenity • that local people's views are considered when making decisions against the criteria
Policy 1.9(1) Higher risk development and sites	<p>3 comments received. Comments included a query as to whether the policy should consider mention of radon gas a specific local hazard and it should be clearer that clause 2 is only ever pursued where clause 1 has been satisfied.</p>
Policy 1.10(1) Flood risk	<p>10 comments received, all seeking consideration is given to providing further detail or stronger policy wording.</p> <ul style="list-style-type: none"> • Consider incorporating this policy into chapter 2 with broader consideration of the whole water environment • Dartmoor's position as the headwaters of many of the county's rivers provides an opportunity for a stronger policy requiring development to contribute to flood reduction • Preamble should reference the Strategic Flood Risk Assessment, as well as the Lead Local Flood Authority's Flood Risk Management Strategy and Flood Risk Management Plan • Stronger requirement to require Sustainable Drainage Systems (SuDS) on all new development • Expand SuDS requirements to ensure SuDS are designed for simple future maintenance and management by a responsible operator and manager

- Include a diagram to help explain the flood risk sequential test
- Policy preamble should reference other flooding sources, such as surface water flooding, and data sources used to assess these.
- Clarify that Devon County Council is the Lead Local Flood Authority and set out when it is consulted

2.4 Chapter 2: Environment

Policy or section	Summary of responses
Policy 2.1 (1) Protecting the character of Dartmoor's landscape	20 comments received, generally expressing strong support. Particularly for the intention to protect the National Park's landscape setting in policy. Comments generally asked that preferable land management practices be controlled through the planning system and that other features of environmental significance be mentioned in preamble.
Policy 2.2 (1) Conserving and enhancing Dartmoor's biodiversity and geodiversity	Strong general support for the policy, with many detailed comments asking for tweaks and amendments, including: <ul style="list-style-type: none"> • Include full explanation of how priority habitats and habitat links have been identified • Include reference to the emerging South Hams SAC SPD guidance • Encourage woodland creation and advise where it is most appropriate • Better acknowledgement of the risks of climate change and importance of water quality to the integrity of habitats and species • Concern that the policy's exceptional circumstances could lead to harm of wildlife sites • Consider including county wildlife sites and naming SACs on map 2.1.
Policy 2.3 (1) Biodiversity enhancement	Strong support for this policy. Many asking the policy be more ambitious and require net gain in accordance with Defra's emerging biodiversity metric and net gain approach. Also that other elements of the environment should be considered, including water, soil and air quality and cultural heritage. Concern that the policy will be difficult to enforce.
Policy 2.4 (1) Dartmoor's heathland and woodland	11 comments received. Some confusion around how this policy should be considered alongside other policies protecting the National Park's special qualities. General requests for more detail. Other comments included: <ul style="list-style-type: none"> • Concern the policy perpetuates a distinction between broadleaf and conifer woodland, without recognising the potential benefits of mixed woodlands • Concern the definition of 'public' recreation is too narrow • Concern that public recreation should not justify development in these locations and is not in accordance with the Sandford Principle
Policy 2.5 (1) Protecting tranquillity and dark night skies	Overwhelming support for the policy intent. Many respondents seeking additional detail and that further work is undertaken in this area, comments included: <ul style="list-style-type: none"> • Concern the policy will lead to a ban on all external lighting, but also recognition that much of the impact can be reduced with PIR lighting • That it be recognised all wildlife is affected by artificial lighting, not just nocturnal species • Requests for DNPA to pursue dark night sky status • The policy could do more to reconcile existing lighting issues • Concern that the tranquillity policy is unduly restrictive for mineral development

Policy 2.6 (1) Conserving and enhancing heritage assets	<p>15 comments received, including</p> <ul style="list-style-type: none"> • Request for conservation areas to be used more strongly to ensure new developments conserve their historic character and setting • Concern that consideration of conservation value should not be limited to buildings of pre-1919 origin • Concern that the policy's exceptional circumstances could lead to harm of heritage assets • Make reference to guidance for assessing the setting of heritage assets systematically • Various requests for specific buildings or areas to be specifically mentioned in policy and/or preamble
Policy 2.7 (1) Conservation of historic non-residential buildings in the open countryside	<p>13 comments received. Many different views on how these buildings are best conserved and detailed views on how the policy should work, including:</p> <ul style="list-style-type: none"> • concern that the policy is too restrictive and unduly elevates the status of non-listed buildings • concern the policy is not restrictive enough and that many historic buildings which are of value to Dartmoor's heritage significance should be allowed to deteriorate • that holiday lets should not be allowed, or only where there is no affordable housing need • residential conversions which are not viable for affordable housing should not be subject to a local occupancy restriction • that greater clarity is provided on how viability will be tested
Policy 2.8 (1) Enabling development	<p>1 comment received expressing concern that this policy could lead to conflicts, particularly with regards flooding.</p>

2.5 Chapter 3: Housing

Policy or section	Summary of responses
Policy 3.1 (1) Meeting housing need in Dartmoor National Park	<p>52 comments received both supporting and objecting to the proposed housing strategy:</p> <ul style="list-style-type: none"> • Support for the indicative housing delivery figure of 65 homes per year, that it is proportionate and reasonable • Objection to the indicative housing delivery figure of 65 homes per year: <ul style="list-style-type: none"> ○ It is not based on an Objectively Assessed Need and will not meet all needs ○ that the indicative delivery figure should be a requirement ○ there are insufficient jobs to match the increase in homes ○ the figure is not sufficiently ambitious and more homes are needed to have the desired effects • Objection to the reduction in proportion of affordable housing provision on new development • Query whether more detailed population projection data is available, use of national population projections shows increasing female population and no increase in population over 60 • The plan should determine the need for housing strategically, requiring housing needs assessments to demonstrate need at the time of application is unnecessarily restrictive • Support for the requirement of housing needs assessments, which helps ensure development meets a local need, provides an

	<p>appropriate level of protection to be expected in a National Park and ensures the National Park's limited development land is used to best effect</p> <ul style="list-style-type: none"> • Objection to the requirement for housing needs assessment to be required to justify larger scale housing development, including allocated sites • Request for a standardised approach to housing needs assessments and guidance on how they are interpreted • Support for use of a cascade for determining eligibility • Some confusion over whether the 80% staircasing restriction applies to all shared ownership homes
Vacant building credit	3 comments received. Generally supportive, but with concern the wording is inconsistent with national policy.
Policy 3.2 (1) Size and accessibility of new housing	<p>19 comments received. General support for some control over house sizes and requiring provision of accessible and adaptable dwellings. Detailed comments included:</p> <ul style="list-style-type: none"> • Concern that fixing house sizes to technical housing standards is too restrictive, will stifle innovation and have a significant impact on viability • Concern that M4(2) standards will often be difficult to achieve and policy requirement should therefore be applied flexibly • Query whether there is sufficient evidence to justify pursuing M4(2) • Request for principal residence restrictions on all new housing • Request to recognise the benefit of second and holiday homes can have to the economy
Definition of local person	<p>7 comments received. General support for a more flexible definition. Suggested alterations included:</p> <ul style="list-style-type: none"> • should account for people on zero hours contracts • should not include those who are commuting out to work.
Definition of affordable housing	<p>19 comments received. Little consensus in the comments which can be summarised as follows:</p> <ul style="list-style-type: none"> • some confusion over whether the discount applied to affordable homes is 20% or 25% • concern the 93m² restriction is too small and cannot respond to those who need larger family sized homes • concern that 25% discount is not consistent with national policy (20%) • concern that the 25% discount is not sufficient so as to be genuinely affordable for local people • request that higher discounts should be avoided as this could threaten overall affordable housing delivery • confusion over whether garages will be resisted for all homes or just affordable homes
Policy 3.3 – 3.6 (1) Housing in Local Centres, Rural Settlements, and Villages and Hamlets	<p>33 comments received. General support for these policies, but with many detailed comments:</p> <ul style="list-style-type: none"> • concern the lower requirement for affordable housing sought is unjustified • the definition of community infrastructure should include employment space • concern that seeking affordable housing on small sites is not consistent with national policy

	<ul style="list-style-type: none"> request that consideration be given to exception sites for local needs housing request that definitions be provided for 'meaningful contribution', 'community infrastructure', 'environmental betterment' and proportionate to the size of the settlement request that preference be given to sites closer to the centre of the settlement
Policy 3.6 (1) Custom and self-build housing	9 comments received. Strong support for support given to custom and self-build housing. Some confusion over how these properties will be restricted in different circumstances, given they may come forward as open market, affordable and local needs within different policies.
Policy 3.7 -3.8 (1) Residential alterations, extensions, outbuildings and replacement dwellings	25 comments received. Strong support for maintaining and strengthening the 30% rule on design and affordability grounds. Some concern that 30% is too great to protect affordability, also that a percentage allowance unfairly favours those with larger houses. Concern that permitted development rights are taken away too easily. Request for definition of habitable floorspace to include habitable floorspace above garages.
Policy 3.9 – 3.10 (1) Rural workers housing and residential annexes to support farming	11 comments received. Some concern around detailed elements of the policy: <ul style="list-style-type: none"> Concern that 25% limit on anti-severance obligations is arbitrary Concern the floorspace restriction is too small, not allowing for an office, boot room and other necessary space Request for temporary accommodation to minimise landscape impact
Policy 3.11 (1) Gypsy and traveller accommodation	4 comments received. Concern the policy criteria are overly restrictive and will not deliver the identified need.
Policy 3.12 (1) Low impact residential development	Few comments, no consensus in comments received, including <ul style="list-style-type: none"> Concern this policy will have significant adverse impact on Dartmoor's biodiversity and landscape Request for this type of development to only be permitted where it is in accordance with the strategic housing policies Concern the policy requirements are too technical and unachievable

2.6 Chapter 4: Communities, services and infrastructure

Policy or section	Summary of responses
Policy 4.1 (1) Supporting community services and facilities	4 comments received. Comments included concern at reducing viability for community services, and to broaden the locations where new services can be provided to locations well-related to a settlement.
Policy 4.2 (1) Supporting public open space and sports facilities	5 comments received. Strong general support. Requests to provide parks to reduce recreational impacts and include specific protection of local green space designations.
Transport	The following summarises general transport comments received: <ul style="list-style-type: none"> Concern there is insufficient support for car-free public transport, and that there is need for a specific transport policy in the Plan Request for safeguarding to support the future possible re-opening

	<p>of the Okehampton to Plymouth railway line</p> <ul style="list-style-type: none"> • Request for further support for the re-opening of Ashburton railway station and connection with the Buckfastleigh and Totnes heritage line • Support for presumption against new road building • Requests to ensure policies prioritise reducing the need to travel • Requests for road safety to be prioritised in decision making • Support for safeguarding to support future potential re-opening of South Brent railway station
Policy 4.3 (1) Parking standards for new development	<p>Strong agreement that car parking is a significant issue in many Dartmoor settlements and that this is appropriately highlighted in the policy. General agreement that increased parking standards are needed and appropriate. Other comments included:</p> <ul style="list-style-type: none"> • Requests for SuDS and impermeable surfaces to be required in all parking areas • Suggestion that car parking should be limited to encourage sustainable transport use and reduce traffic on unsustainable rural roads
Policy 4.4 (1) Electric vehicle charging points (EVCPs)	<p>Strong support for encouraging uptake in electric vehicles through requiring infrastructure provision. There were concerns about the impact this requirement would have on viability, whether there was sufficient electrical capacity or that it would lead to the need for additional sub-stations. In contrast some commenters felt public on-street EVCPs should also be required.</p>
Policy 4.5 (1) Public car parks	<p>Few direct comments, but the following relevant issues were raised in general transport comments:</p> <ul style="list-style-type: none"> • Requests for SuDS and impermeable surfaces to be required in all parking areas • Request that public contributions to car parking are made to support provision and maintenance
Policy 4.6 (1) Signs and advertisements	<p>1 comment received. Request that the policy should not be used to control temporary signage for community events.</p>
Policy 4.7 (1) Telecommunications development	<p>No comments received.</p>
Policy 4.8 (1) The access network	<p>5 comments received,</p> <ul style="list-style-type: none"> • The policy should not exclude equestrian use of the access network • Concern that allowing public benefits to outweigh harm to the access network could lead to poor decisions which contradict purposes • Request for the policy to better reference sustainable transport benefits of the access network

2.7 Chapter 5: Economy

Policy or section	Summary of responses
Policy 5.1 (1) Business and tourism development	<p>11 comments received. Support for the recognition given to Dartmoor's largest economic contributors and the overall economic strategy set out in 5.1. General support for the approach to business and tourism development set out in the policy and preamble. There was some confusion that this policy does not address residential tourism development.</p>

	<ul style="list-style-type: none"> • Suggestions that business development is not subjected to the same level of assessment as residential development • Request that non-residential tourism development be allowed in villages and hamlets • Policy wording should prioritise areas accessible by public or car-free transport
Policy 5.2 (1) Development affecting town centres	<p>17 comments received on section 5.3. General support for introducing a town centre approach and sequential test, detailed comments included:</p> <ul style="list-style-type: none"> • Concern the 150sqm threshold for the town centre sequential test is too low and will discourage appropriate business development • Request for the town centre sequential test to be more clearly distinguished from the flood risk sequential test • Request for further evidence on DNPA's town centres, including use classes, footfall and vacancy rates • Request for further clarity in when town centre development outside a town centre will need an impact assessment
Policy 5.3 (1) Shops and other active uses	<p>17 comments received on section 5.3. Strong support for a flexible approach to changes of use in shopping areas.</p> <ul style="list-style-type: none"> • Concern that some shopping areas are unsuccessful and experience high vacancy rates • Concern the six month marketing period is too short
Policy 5.4 (1) Tourist accommodation	<ul style="list-style-type: none"> • Request for this policy to reference camping and touring caravan site policy • Request for more flexibility to allow holiday let occupancy conditions to be removed and permit permanent residential where well related to services • Request to prioritise developments with access to public transport or within walking distance of service
Policy 5.5 (1) Staff accommodation for serviced accommodation businesses	No comments received
Policy 5.6 (1) Camping and touring caravan sites	<p>3 comments received. Including concern there is no support for more innovative holiday-let structures, such as treehouses, pods, yurts and shepherd huts and request to clarify how 'park homes' will be considered.</p>
Policy 5.7 (1) Agriculture, forestry and rural land-based enterprise development	<p>10 comments received. Consultation generated detailed responses to this policy with little consensus, including:</p> <ul style="list-style-type: none"> • Concern policy is too restrictive towards isolated buildings which support genuine traditional farming practices that are under threat and necessary to conserve Dartmoor's special qualities • Support for mention of forestry alongside farming and support for the Plan's general positivity about forestry as a sustainable and viable land use • Concern the policy is too flexible for smallholders allowing them to easily demonstrate need for unnecessary buildings which contribute to development sprawl • Concern policy is too restrictive towards forestry businesses which support the local economy, in particular policy does not allow sufficient flexibility for necessary access infrastructure, tracks, handling and loading areas, secure storage and drying areas

	<ul style="list-style-type: none"> • Request to support forestry hubs that allow small-scale owners to share infrastructure • Concern that the condition requiring agricultural buildings to be removed upon redundancy has been removed from policy. • Request to include land management plans akin to that required in policy 5.9
Policy 5.8 (1) Farm diversification	2 comments received. Diversification of forestry businesses should be supported in the same way as agricultural businesses
Policy 5.9 (1) Equestrian development	2 comments received. Strong general support, but concern that not allowing horse tape is unworkable.

2.8 Chapter 6: Minerals, waste and energy

Policy or section	Summary of responses
Policy 6.1(1) New or extended minerals operations	<p>10 comments were received on this policy, focussed largely on the detailed wording around major development.</p> <ul style="list-style-type: none"> • Policy should repeat more clearly the major development test in the NPPF • Potential for the policy to provide for clearer primacy of purposes and special qualities • Support for clear read-across with other policies • Request for more explicit reference to hydrology and flood management • Supporting text should reference temporary nature of minerals operations • There is a conflict arising where small scale quarrying may also be major development • Detailed assessment of building stone needs should be undertaken
Policy 6.2(1) Minimising the impact of minerals operations	<p>Few comments, principally supportive and with detailed points on:</p> <ul style="list-style-type: none"> • Consideration of the heritage value of redundant workings • Opportunities for betterment through restoration
Policy 6.3(1) Minerals safeguarding	Few comments, though strong support for the minerals safeguarding policy, with specific comments on boundaries and omissions.
Policy 6.4(1) Waste Prevention	Few comments, though overwhelming supportive of this policy.
Policy 6.5(1) Waste disposal and recycling facilities	Few comments, though overwhelming supportive of this policy.
Policy 6.6(1) Renewable energy development	Few comments, generally supportive though with some suggestions that the clear view on large scale renewable energy development is welcome, but also views that it should include opportunity for exceptions.

Policy or section	Summary of responses
Policy 7.1 (1) Settlement Boundaries and Development Sites	<p>General support for the principle of settlement boundaries and the clarity of policy interpretation they bring. Specific comments on:</p> <ul style="list-style-type: none"> Concern that there is no support for outline applications on allocated sites which does not appreciate that many landowners are not developers and outline consent may be needed before a site can be sold. Strong support for maps, request for inclusion of maps for villages and hamlets Include flood zones and areas of surface water flooding on settlement maps Request for site allocations to include indicative capacity for dwellings or employment space Request for allocations to state what habitat and features are to be retained and what opportunities for net gain exist General support for small-scale development in smaller villages, where it is high quality and meets a local need <p>Detailed comments related to individual settlements and site allocations are summarised below.</p>
Policy 7.2 (1) Community Planning	<p>2 comments received with detailed comments:</p> <ul style="list-style-type: none"> Request for policy to support community consultation on proposals Request for policy to clarify relationship between local plan and neighbourhood plan
Ashburton	<ul style="list-style-type: none"> It should be noted that Ashburton is affected by a critical drainage area Request for flooding issues to be dealt with strategically Request for stronger protection of the railway heritage on Proposal 7.4 Request for development of Proposal 7.4 not to prejudice future sustainable transport options Consider extending area of historic setting
Buckfastleigh	<ul style="list-style-type: none"> It should be noted that Buckfastleigh is affected by a critical drainage area Request that Buckfastleigh be given a higher proportion of growth because it is more sustainable and has more capacity Concern allocations are already coming forward and therefore will provide insufficient housing for the plan period Concern one allocation will not provide a meaningful affordable housing contribution and so should not be justified in the National Park Requests to consider allocation of alternative sites Objections to consideration of alternative sites Concern about biodiversity and flooding issues at Proposal 7.5 and 7.6 Concern regarding impact of proposed development on flyways of the South Hams SAC
Chagford	<ul style="list-style-type: none"> Request to extend area of allocation for proposal 7.8 Request for Proposal 7.8 to be for light industrial uses only Concern proportion of affordable housing at Lamb Park has

	reduced
Horrabridge	<ul style="list-style-type: none"> Whilst allocation has been drawn to avoid flood zone 3 a site specific FRA should still be provided
Moretonhampstead	<ul style="list-style-type: none"> Request for amendment to Settlement Boundary Concern the wording of Proposal 7.12 does not require affordable housing provision and should be required to respond to a local need like other allocations Request for Proposal 7.12 to consider future of Devon Air Ambulance landing site Request for Proposal 7.12 to be supported by SFRA Level 2 and sequential test Request for Proposal 7.12 to retain railway heritage Concern that existing allocated sites cannot be relied upon to deliver Request to consider allocation of alternative sites
Princetown	<ul style="list-style-type: none"> Request to extend settlement boundary
South Brent	<ul style="list-style-type: none"> Proposal 7.17 has surface water flooding risks and should safeguard a riparian corridor along the River Avon and minor watercourse on-site Request that South Brent be given a higher proportion of growth because it is more sustainable and has more capacity Concern there is not satisfactory justification for allocation of Proposal 7.14 and 7.15 over other development options Request for a Local Green Space Designation
Yelverton	<ul style="list-style-type: none"> Concern Proposal 7.20 land provides important foraging for a wide variety of species Concern Proposal 7.20 will impact on long distance views, dark night skies and tranquillity Concern consistent methodology has not been used for allocating Proposal 7.20 Request to consider other sites in Yelverton as alternative to Proposal 7.20 Concern the Special Policy Area is unjustified and unnecessarily restrictive Concerns about impact of Proposal 7.19 on local traffic Requests to consider allocation of alternative sites
Buckfast	<ul style="list-style-type: none"> Concern not all listed buildings and scheduled monument are shown on proposals map Request for proposal 7.22 to take into consideration a broad mix of potential uses Concern provision of retail at Proposal 7.22 could undermine the Buckfastleigh town centre.
Bittaford	<ul style="list-style-type: none"> Request for Bittaford Settlement Boundary to include land to the west of the settlement
Christow	<ul style="list-style-type: none"> Request to extend Christow's Settlement Boundary to include Gidley's Meadow.
Dousland	<ul style="list-style-type: none"> Request to allocate land to the west of the village

Mary Tavy	<ul style="list-style-type: none"> • Concern Settlement Boundary is too tightly drawn • Concern site for primary school has not been allocated
Meavy	<ul style="list-style-type: none"> • Request that Meavy be considered an unsustainable location for housing and business growth
South Zeal	<ul style="list-style-type: none"> • Concern policy preventing development on burgage plots is too restrictive
Wrangaton	<ul style="list-style-type: none"> • Request for settlement to be included in the Local Plan as a classified settlement

3 Appendices

3.1 Notes on Drop-in Events

Location:	South East (Ashburton Christmas Fayre)
Date/Time:	6 December 2018 (15.00 - 21:00)
Officers:	Dan Janota, Alex Gandy (Kevin Bishop, Andrew Cooper, Jeremy Christophers)
Attendance:	Approx 30
<ul style="list-style-type: none">• Introduced the Local Plan to several attendees and encouraged them to comment via our website.• Discussed the draft householder extension policy with an attendee who felt that opportunities in local centres should be more flexible to allow working families to adapt their homes to meet their needs. Explained that this approach can only work to help one family and presents a problem for incoming families given that the National Park has limited ability to replace the loss of smaller housing in its constrained environment.• Discussed opportunities for self-build with a local couple and explained that the draft policies are more flexible in this regard, allowing for self-build without the need for an affordable housing restriction. Recommended they approach the Town Council to register their interest.• Discussion with one attendee around ensuring that the Ashburton conservation area, strip fields and burgage plots would still have sufficient protection in the draft policies.• Discussion with a local resident about downsizing opportunities and the issue of household sizes decreasing because elderly people do not generally want to move out of larger homes. Discussed development opportunities coming forward in Ashburton, which could include some homes suitable for downsizing. Also discussed introduction of M4(2) requirement for building regulations in Policy 3.2, which allows homes to be adapted for older people.• Discussed Chuley Road and current issues surrounding closure of Tuckers Country Stores, including Chuley Road masterplan, flooding and affordable housing.• Discussed the planning history of a brownfield site in Dean Prior with access limitations• Discussed how the new draft policies might affect a brownfield site in South Brent, including provision of affordable housing on recent development sites in South Brent.• Question around sustainability of listed buildings, how policies might accommodate energy efficiency improvements (windows in particular) and that there is a 'bigger picture' on climate change over building conservation.• Attendee query on housing strategy, how numbers are reached. Discussed the demographic evidence we have and the proposed strategy this has led to.• Discussion around proposed settlement strategy and implications for Walkhampton.• Concern from attendee that Tucker's decision to close and not pursue site at Peartree will lead to Ashburton's shopping area being threatened by a large out of town store.• Question around the role of the Area of Historic Setting.	

Location:	South West (Yelverton Memorial Hall)
Date/Time:	11 December 2018 (15.00 - 18:00)
Officers:	Dan Janota, Jo Rumble, Helen Maynard (Donna Healy, Bill Hitchins, Philip Sanders)
Attendance:	Approx. 80
<ul style="list-style-type: none"> • N.b. Hall shared with the Neighbourhood Plan Group (Ric Cheadle) • Introduced the Local Plan to several attendees and encouraged them to comment via our website. • Attendees keen to understand housing numbers, how they area arrived at, whether we have a target, if so who sets it. Described the national context, National Parks being excluded from the standard methodology, the 'bottom up' approach and focus upon local needs. • Explained to a number of attendees that housing numbers are not an 'exact science' and that the plan looks forward 15 years, not as simple as to say need it met, or to precisely count site yields. Stressed importance of the need to have an appropriate supply in order to meet need, provide certainty, and defend decisions. • Attendees wishing to understand how many homes would be built on each of the proposed allocated sites. • Attendees asking why the other sites previously shown have been discounted. Explained the Process of Land Availability Assessment (LAA), the feedback from the meetings with communities in 2017/18. Strong support for not including land at Meavy Lane and land at Gratton Cross. • Concern about highway access to the proposed allocation at Elfordtown and road safety. • Suggestions to improve the quality of the junction between Meavy Lane and the A386 / roundabout. And suggestion to bypass Yelverton and build houses on common land at Leg O'Mutton and former RAF Harrowbeer • On balance, support for the land identified at Binkham Hill, with access to main road, and potential linkage with cycleway. • Questions around infrastructure capacity. Advised on process so far, who we talk with, Infrastructure Delivery Plan (IDP). Advised to feed in through the Local Plan review, and include discussions with the Neighbourhood Plan Group. • Questions around the Special Policy Area at Eastella/Westella Roads and its reasoning. Some supported, some wished it to be expanded, a few suggested increase density in this area believing there would then be no requirement to allocate land for affordable housing. • Concern about new agricultural building policy and if this supported modern hill farm management systems, and new farm entry • Concern regarding meavy lane safety and whether new development will exacerbate or may also be opportunity for improvement • 1 person concern that new cycle path will lead to housing development along its length 	

Location:	North (Whiddon Down Village Hall)
Date/Time:	13 December 2018 (15.00 - 18:00)
Officers:	Sassie Tickle, Alex Gandy, James Aven (Kevin Ball, James McInnes)
Attendance:	Approx 20
<ul style="list-style-type: none"> Attendees from South Tawton, Sticklepath, Cheriton Bishop, Belstone, Crockernwell and Whiddon Down. Discussed affordable housing and local need with a young couple from Crockernwell unable to buy in Crockernwell or Cheriton Bishop. Recent local affordable housing scheme (not within DNP) limited to those in housing need meaning they don't qualify. Conversations about changes to the settlement hierarchy and how policy allows development within or adjoining different settlement types. Discussed introduction of settlement boundaries for rural settlements and encouraged attendees to review them. Discussed current housing sites and future site allocations at Chagford and Moretonhampstead. A resident and Parish Councillor expressed concern that developments were not contributing sufficient proportions of affordable housing. Discussed potential development site west of Whiddon Down and that the revised employment policy now allowed for employment adjoining rural settlements in principle. The attendee welcomed this change and the potential for new employment opportunities to be created in appropriate locations in the National Park. Discussed farm shop proposal on opposite side of A30 junction and whether the new local plan would affect how this was being considered. Discussed inclusion of landscape setting in Policy 2.1 (1) and how this informs how DNPA responds when consulted about proposals outside the National Park boundary. Discussed different affordable housing models and the method for ensuring that new developments meet an identified need. An attendee raised concerns at existing parking standards and welcomed the increased standards in the draft plan. Requirement to provide electric vehicle charging points Discussed shift in policy to allow small scale employment uses in modern redundant agricultural buildings. An attendee expressed considerable concern that not enough was being done to tackle biodiversity loss and climate change. We discussed the draft policies on biodiversity enhancement, and the current government consultation on biodiversity net gain. Also that there were unfortunately limited tools for planners to be able to improve the energy efficiency of new buildings above that required by building regulations. Attendees generally spoke positively about the draft Local Plan's presentation, supporting its clear language, good design and useful graphics. 	

Location:	North East (Moretonhampstead Community Club)
Date/Time:	18 December 2018 (15.00 - 18:00)
Officers:	Sassie Tickle, Dan Janota, Alex Gandy, Chris Hart (George Gribble, Mike Jeffery)
Attendance:	Approx 35
<ul style="list-style-type: none"> The issue of second homes was discussed by many attendees, who all expressed concerns about the existing housing stock being bought by people who didn't contribute to the local economy. All appreciated that planning policy could only control occupation of new houses, which were not generally as desirable as second homes. An attendee had detailed queries about how the indicative housing target had been calculated, including whether the population and household forecasts were derived from local or national trends. The increase to residential parking standards set out in Policy 2.3 was welcomed by two attendees. Discussion around how a small exception site could be delivered in one of Dartmoor's smaller villages, what housing need evidence was required to facilitate this, where development might be acceptable and what types of affordable housing could come forward. An attendee discussed barn conversions and that existing policy was not supporting sustainable communities by requiring holiday lets, rather than allowing permanent residential accommodation. The new draft policy was discussed and it felt that this was a better process for finding the optimum viable use for traditional redundant buildings. An attendee expressed strong support for the policy on dark night skies, stating that it will support any future application for dark night sky status. The draft biodiversity enhancement policy was also discussed and it emphasised that it has the potential to deliver significant benefit cumulatively, but that on larger sites it becomes more difficult to work. An attendee expressed concern about how detailed building conservation matters were resolved and was concerned about how the Authority ensured designated heritage assets are protected against unauthorised works. Some concerns were expressed around the quality of design and build in some recent developments in Moretonhampstead, including the Sawyers housing and employment units Some attendees wished to discuss what constitutes the Dartmoor vernacular, and exploring opportunities for contemporary design Some attendees considered there to be a need for appropriate homes for older downsizers in the town, and believed that DNPA had a policy which prevented bungalows. They were supportive of the approach to building regs M4(2) when described. Some attendees wished to better understand how housing numbers were arrived at, and how many homes could be built on different sites identified in the draft plan. A number of attendees were concerned about the impact of national policy on Vacant Building Credit, this policy and the limited ability of the Local Plan to influence this. Attendees were keen to see an appropriate mix of affordable housing types, including rented and shared ownership type properties A number of attendees expressed concern that Dartmoor's road network did not have the capacity for any further increase in traffic Several attendees expressed strong support for the opportunity for infill local occupancy self-build Attendees raised concerns about the poor availability of public transport options, though few used what was available. There was recognition of reliance on the private car and support for the policy on electric car charging points. Many attendees welcomed DNPA's responsiveness to previous concerns expressed by the community around housing numbers and the local desire not to develop on land at Courtenay Park. 	

3.2 Notes on Consultation workshops

3.2.1 Housing workshop, 21st January 2019 (0900 – 1230)

Introductory presentation from DNPA covering the housing issues the Local Plan has identified and how it is seeking to address these through the policies in the Local Plan. Topics covered included demographic trends, housing need, affordability, second homes, affordable housing models, householder development and settlement strategy.

Questions included clarification on affordability evidence, models of affordable housing and how need will be matched with supply on a case by case basis.

The remainder of the workshop was spent discussing the following questions:

- Have we covered the main areas?
- Should we be doing anything differently?
- Do we want the local plan to achieve anything more?
- Is the wording right?
- Will it achieve what we want it to?
- How might we do better?

Delegates discussed these questions in relation to 4 topics (strategy, large sites, small sites and delivery), each on a separate table which delegates circulated freely. The below summarises the themes which were discussed and written down at each table.

Table 1 - Strategy

The local plan should be clear on what 45% affordable housing policy represents: it is a target that is known to be achievable, but not black and white and is subject to viability. Arbitrary imposition of this policy could significantly restrict delivery.

A flexible RES policy which allows for variation of the level of affordable housing provided through cross-subsidy and provision of community infrastructure is supported.

Aim for policy should be to arrive at a position where no public subsidy is required.

A delegate asked that we think carefully about removing staircasing restrictions, because of the potential loss of affordable housing stock.

There was significant discussion on the need to match occupant's desires with AH models being provided. Recommendation not to arbitrarily impose 70:30 split without consulting community. Delegates were comforted by flexible wording in policy and gave full support of having an approach which required housing needs assessments to evidence need before justification.

Affordability evidence should consider what proportion of a person's earnings it is reasonable to spend on housing.

Within the housing topic paper references to SWDJLP Topic Paper 2018 and Plymouth SHMA 2018 need to be updated.

Add supply forecasts for proposed allocated sites, prospective windfall and affordable housing to the housing Topic Paper

Query as to whether three dragons evidence work needed to be published separately, rather than evidence being directly produced in topic paper.

Query whether indicative housing delivery target should be shown as an annual housing figure or one for the plan period. A plan period figure is more defensible and clearer that annual delivery may vary. Annualised target can also be provided.

The connection between policy and paragraph 65 of NPPF should be made clear, particularly there is no scope for any unmet need to not be met.

Table 2 - Small Sites

Strong support for self-build – some confusion around definition in how it could be open market/affordable/local need

Local need custom/self-build understood and supported

Support for the principle of commuted sums, in particular to deliver affordable housing in the most appropriate location, and to make best use of sites where they may not be achievable for affordable housing.

Concerns around transparency of the calculation of commuted sums and their use

Potential that RP's may remain interested in very small sites still, where there is an existing and well related stock within that settlement

Discussion around Housing Needs Assessments, how to do these better, quicker and more reliably. Better use of Devon Home Choice as 'live' data.

Support for the fact that HNAs would not be required on smaller sites.

Table 3 - Large Sites

Allocated sites should only come forward where there is an up to date assessment of identified local affordable housing need, otherwise they shouldn't come forward.

Site allocation policies do not state the site capacity. Inclusion of this would improve the clarity of site policy and also help communities understand the number of houses expected. It can be expressed as indicative capacity e.g. 'in the order of'.

Table 4 - Delivery

Custom and self-build: delegates query whether custom and self-build would be subjected to s106 obligations? Should there be a floor area threshold?

Definition of 'housing' for single person households (SPHs). Rural Providers struggle to meet the needs of SPHs, is there a different model for SHP based on micro-houses (limiting floor areas to 40-50sqm): affordable by size of dwelling/land/plot size. Low impact visually and sustainably.

3.2.2 Environmental Workshop, 15th January (0900 – 1230)

Introductory presentation from DNPA covering the environmental issues the Local Plan has identified and how it is seeking to address these through the draft policies. Topics covered included settlement strategy, biodiversity, landscape, tranquillity and dark night skies, and cultural heritage.

Questions included clarification on coverage of the local plan and further guidance on tranquillity.

The first exercise took approximately an hour and was spent discussing the following questions:

- Have we covered the main areas?
- Should we be doing anything differently?
- Do we want the local plan to achieve anything more?
- Is the wording right?
- Will it achieve what we want it to?
- How might we do better?

Delegates discussed these questions in relation to 4 topics (biodiversity, landscape, tranquillity and dark night skies, and cultural heritage), each on a separate table which delegates circulated freely. The below summarises the themes which were discussed and written down at each table.

Biodiversity

Discussion around how to measure quality, connectivity, scale and delivery of landscape scale improvements

Para 2.3.10 wording is not legally strong. LPA doesn't need to be 'confident' a licence will be granted 'rowland homes vs Hampshire Council' LPA only has to show 'due regard' to EPS as Natural England is expert authority. Species licencing is currently under review.

Concern Table 2.2 is unrealistic/too much to expect. Table 2.3 could be too restrictive and needs to be site specific to reflect local need, otherwise developers will select cheapest option, plant 3 trees. Concern around how we incentivise a range of delivery rather than just cheapest option. Another respondent stated that Table 2.3 gave too much optionality and should define compulsory minimum standards for key objectives e.g. bird/bat boxes.

Need a statement about the importance of common species.

Query around how to protect biodiversity on border given NPA policies are more restrictive.

Define habitat links within the text and evidence them. Consider adding Teign valley corridor.

Insert local sites (CWSs) onto Map 2.1

Policy 2.2 change no net loss to net gain.

Policy 2.3 should apply to any development, not just that creating floorspace.

Tranquillity and Dark Night Skies

Para 2.5.2: consider adding absorbing cultural time depth.

Is the requirement to avoid external lighting realistic given owners will retrospectively add later on, does this conflict with safety/security?

The reasons for restricting lighting should broaden to include impact on all animals/flora, not just nocturnal species. Lighting can impact on diurnal patterns of all animals.

Table 2.1: suggestion to separate columns

References should include name/organisation as well as hyperlink

Include full reference to policies map, unclear for some unfamiliar with local plan.

Refer to CPRE dark skies data, which is more up to date than CPRE tranquillity mapping. Although question around whether the two are interchangeable. Could also refer to ILP lighting design guidance.

Need clarity on what factors affect tranquillity, also AONBs pushing for Devon-wide advice note on tranquillity.

Cultural Heritage

Para 2.6.11: either leave out or expand

Para 2.6.1: wider definition of mineral exploitation needed not just mining, also waste tips, streaming etc. Add registered historic parks and gardens, historic designed views, both within, to and from the NP (e.g. view to Haytor from Stover). Add landscape as setting to heritage assets.

Para 2.6.2 NDHA's wider definition, use 1st edition OS maps (see SHDC/WDBC JLP guidance)

'Traditional' needs definition

Para 2.7.3: last sentence ungrammatical

Para 2.6.5: add heritage interest in woodland, add industrial housing

Para 2.7.5: protect possible railway routes from development which would prejudice future rail connections.

Consider adding reservoirs as biodiversity, amenity and cultural/engineering heritage

Landscape

Need statement that natural and cultural heritage are equal elements that need to be considered in balance with each other

Need to consider how natural evolution will occur with climate change and work to effect biodiversity

Refer to Devon Character Areas more accurately in supporting wording, see DCC comments

Need to acknowledge links between landscape/environment/flood risk/water management. Flood risk and water quality/resources should be considered together

Could highlight in supporting text that the LCA describes the natural and human influences that have shaped the landscape and what forces for change are acting on the landscape now. Highlight importance of LCA guidelines to protect, manage etc.

Refer to landscape's role in managing natural processes, e.g. climate change, and how it is shaped by natural processes.

After a short break, delegates regrouped and split into three groups, two groups discussed the current government consultation on net gain and the third discussed the authority's draft policy approach to redundant non-residential buildings.

Net gain

DNPA introduced government biodiversity net gain consultation and the groups considered the following questions:

- Will it work?
- What elements of the environment should we concentrate on?
- What policy tools can facilitate enhancement?
- Are landowners interested in being paid to deliver offsets?
- Is £21k/Ha enough?
- How should maintenance be secured?
- Will it create a market for biodiversity units?
- Would landowners be receptive to conservation covenants?

The group were mostly of the view that net gain could deliver improvements in how the planning system accounts for biodiversity loss.

Two members of the group representing wildlife trust organisations had experience with biodiversity offsetting and stated that it had been delivered successfully.

All group members felt that planning should recognise impacts on and require enhancement of the broader environment, not just biodiversity on a habitat hectareage basis.

The group were unable to confirm whether the tariff would cover costs sufficiently.

The group were generally of the view that relying on existing strategic mapping was sufficient, rather than there being a need for detailed phase 1 mapping or more.

The group were generally of the view that lump sum contributions could deliver robust benefits, even where this was less scientifically robust in terms of delivering measurable net gain.

Although supportive in principle, the group felt that more detail on the scheme was needed to give a final view on whether it would work.

Redundant non-residential buildings

General recognition from the group that there is a need to address this and provide opportunity for change.

Detailed discussions amongst the group of the conflicts arising from new uses on farmsteads, in particular from 'outsider' residential uses which lead to complaints. Class Q provisions outside the NP have led to precisely this, where farmers have jeopardised their own businesses by selling of a barn.

Concerns around reference to 'storage and distribution' which could be considered to have a potentially significant impact – appears too similar to use class terminology and therefore large scale.

Confusion on the use of table 2.4 insofar as it covers only the material changes to the building itself, and not the broader impact of the uses (e.g. highways). Question over how to better take into account impact of curtilage change or other associated development needs which might follow.

Suggestion that a wedding venue is not a good example, as there are examples within each impact category

Questions over how to better link this with farm diversification so as to maintain the primacy of the farm business over alternative incomes which could lead to the loss of the farm.

General support for commuted sum use, questions over viability. Questions around the potential for contributions to feed back into maintenance of heritage assets rather than into affordable housing.

3.2.3 Farming and Forestry Workshop

DNPA introduced the agriculture and forestry issues that the National Park had identified through evidence gathering and the 2016 issues paper. DNPA then introduced how the Local Plan's agricultural and forestry policies were responding to these issues. The presentation covered agricultural and forestry development, rural workers dwellings, farm diversification and Equestrian development. There were a small group of attendees which allowed focussed discussion on the proposed policies.

Attendees felt that the Authority had a good grasp of the issues facing the agricultural and forestry industries.

Attendees felt that the rural workers dwelling policy should be clearer on the allowable floorspace for a farm dwelling, including by stating whether the size guide in policy included necessary office space.

The provisions made in policy to support farm succession were supported although there was some uncertainty whether annexe accommodation would be large enough.

Attendees were generally accepting of the need for anti-severance obligations, albeit thought the 25% untied allowance was arbitrary and should be applied flexibly and that the Authority should not restrict agricultural annexes for succession.

Attendees supported occupancy conditions being applied flexibly and allowing agricultural dwellings to be occupied by forestry and other rural workers.

There was detailed discussion around the economics of succession to aid the understanding of attendees and DNPA policy makers.

Attendees were generally accepting of introducing a definition of an active farm for the purposes of applying the farm diversification policy.

There was discussion around how the local plan policy could support forestry development in a more positive manner, including by supporting infrastructure 'hubs' and inserting more direct language which tackled any uncertainty. It was also suggested that the Local Plan should not perpetuate a division between broadleaf and conifer forest, it should be recognised that a diverse mixed canopy can be of just as significant biodiversity value.

3.2.4 Parish Council Workshop

42 Parish Council representatives attended the workshop. After a brief introduction DNPA provided an update on Development Management followed by an exercise seeking Parish Council's views on communication with the Authority. This was followed by a presentation on the draft local plan review and associated discussion on the draft local plan. The discussion was focussed around four tables, each with a topic for discussion which attendees circulated freely, the topics included:

- Things you wouldn't want to happen differently
- Decisions you would like to have gone a different way
- Areas of policy you find unclear or uncertain
- Local issues which planning can help address

The discussion at each table is summarised below:

Things you wouldn't want to happen differently

Positive comments received on the Design Guide, priority given to conservation of the landscape, protecting special character, biodiversity enhancement (policy 2.3), Dartmoor Rangers, publishing a clear Local Plan and keeping to it.

Decisions you would like to have gone a different way

Concerns were expressed around: sustainable local forestry enterprises, lack of community benefit from brownfield proposals, conversion of redundant farm buildings to residential, inconsistency between decisions, clarity of communication and policy objectives, ensuring quicker decisions for businesses and concern some development is unnecessary in the National Park.

Areas of policy you find unclear or uncertain

Suggestions included: what constitutes a farm, what requires planning permission, definition of major development, definition of affordable housing, development of redundant buildings, brownfield sites, Neighbourhood Planning, agricultural development and drainage.

Local issues which planning can help address

Suggestions included: affordable housing, community facilities, lack of parking, quality of build, small-scale development in smaller villages, adequate drainage, ensure redundant agricultural buildings are removed.