

## **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 *	Rob							
Surname *	Kinchin-Smith							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident		An agent		A Town / Parish Council		An organisation	Yes
	A business		A visitor		A statutory agency		Other (specify below)	
Other								
Job title (where relevant)								
Organisation (where relevant)	Friends of Ashburton Station							
On behalf of (where relevant)	Friends of Ashburton Station							
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes	<b>YES</b>	No					

\* 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 **YES**

### **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)	<b>Chapter 4 (Transport)</b>
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:

	<b>Yes</b>	<b>No</b>
<b>i)</b> Legally compliant		<b>No</b>
<b>ii)</b> Sound		<b>No</b>
<b>iii)</b> Compliant with the Duty to co-operate		<b>No</b>

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.

We remain concerned about the incomplete nature of the published Evidence Base on the Transport topic, the lack of a relevant Statement of Common Ground on Transport, or other evidence of cooperation with relevant stakeholders outside of the National Park.  
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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.

Paras 24-27 of the NPPF emphasise the Duty to Cooperate. Para 104 of the NPPF requires that *"Planning policies should... be prepared with the active involvement of... transport infrastructure providers and operators and neighbouring councils"* and should *"identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; and "provide for any large scale transport facilities that need to be located in the area"*. With regard to rail, we would urge DNP to consult and cooperate with the Peninsular Rail Task Force, Cornwall Council, Devon County Council, Somerset County Council and Plymouth City Council, Torbay Council, the Local Economic Partnerships (LEPs) for Cornwall and the Heart of the South West, Railfuture South West and the Campaign for Better Transport, all of which DNP has a statutory 'Duty to Cooperate' with on Strategic planning and transport matters under the Localism Act and NPPF.  
[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)?

<b>No</b> , I do not wish to participate in hearing session(s)	<b>Yes</b>	<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 the Inspector considers it 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)	4.3.1
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:

	<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	<b>Yes</b>	

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.

We strongly support the additional sentence: *“Despite the challenging context the Local Plan seeks to ensure development supports provision of sustainable transport opportunities and that development which prejudices these opportunities is refused.”* In terms of rail reinstatement and the development of other sustainable transport routes, we believe this addition better reflects paragraphs 102 and 104 of the NPPF

[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)?

N/A	<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.

N/A

**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)	Policy 4.3 (2) Enabling sustainable transport
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	<b>Yes</b>	

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.

We strongly support this additional Policy. We believe it reflects our comments on the Reg.18 Local Plan as well as paras 102 and 104 of the NPPF and Dartmoor’s climate emergency commitments

[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.

N/A

[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)?

N/A	<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.

N/A

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**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)	4.3.2
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:

	<b>Yes</b>	<b>No</b>
<b>i)</b> Legally compliant	<b>Yes</b>	
<b>ii)</b> Sound		<b>No</b>
<b>iii)</b> Compliant with the Duty to co-operate		<b>No</b>

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.

We believe that opportunities to consult relevant stakeholders with regard to sustainable transport and particularly rail reinstatement has been missed.

In order to better reflect the LPA's commitments under the new Policy 4.3 (2) "Enabling sustainable transport" we would seek that the first bullet point at 4.3.2 be amended thus (bold, underlined):

*"There has been a recent desire to explore whether the Buckfastleigh to Totnes heritage line could be extended to its original Ashburton terminus. **It is recognised that such a link could result in considerable public benefits, not least for the potential to deliver car-free footfall into the National Park and due to the likely uplift to Ashburton's economy. It is also recognised that such a link might provide for high quality walking and cycling networks and supporting facilities.** The option for this exists through the identification of land at Chuley Road for redevelopment."*

[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.

N/A

[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)?

N/A	<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.

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**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)	Proposal 7.4(2): Land at Chuley Road, Ashburton
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>No</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.

Save for a change of Proposal number from 7.4(1) to 7.4(2), the Regulation 19 Final Draft Local Plan remains unchanged with regard to Land at Chuley Road, Ashburton.

We are generally supportive of this draft Proposal, including bullet points:

**D) opportunities to conserve and enhance the sites' railway heritage** and

**E) opportunities to improve sustainable transport links**

[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.

In order to better reflect new Policy 4.3 (2) "Enabling sustainable transport" and reflecting our comments on sustainable transport (Chapter 4), we would continue to ask that the railway formation be protected through the Proposal site, perhaps by amending bullet point D) to:

**D) opportunities to conserve and enhance the sites' railway heritage (buildings, the spaces between them and the former railway formation)**

[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)?

N/A	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.

N/A

**Additional space** (please tell us which question you are continuing from):

**Chapter 7 (Towns Villages and Development Sites)**

We welcome and strongly support **Proposal 7.17 (2) Land at Station Yard, South Brent**, setting aside land to safeguard the opportunity for a new railway station at South Brent and associated car park. We had failed to notice this Proposal in our consultation response to the Regulation 18 Draft Local Plan.

We would continue to seek that land be identified and safeguarded in Section 7 of the Local Plan, in association with the Peninsular Rail Task Force and relevant authorities, for the proposed **North Cornwall Parkway station at the A30/A386 Sourton junction**.

***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)



## **Chapter 4 (Transport)**

We welcome and strongly support the changes in the Regulation 19 Final Draft Local Plan in support of sustainable transport options, in particular the addition to para 4.3.1 (*“Despite the challenging context the Local Plan seeks to ensure development supports provision of sustainable transport opportunities and that development which prejudices these opportunities is refused.”*).

Similarly we welcome and strongly support the new Policy 4.3 (2).

### ***“Policy 4.3 (2) Enabling sustainable transport***

***In order to minimise our impact on climate change, and promote healthy lifestyles, new development should encourage and enable sustainable travel by protecting, enhancing and providing new walking, cycling, and sustainable transport routes.***

***Development should support a network of walking and cycling routes which are safe, convenient, and connect to local services, facilities and sustainable transport links. Opportunities for sustainable transport development which meets the needs of the National Park will be supported. Development which would prejudice the ability to deliver future sustainable travel and transport infrastructure will not be approved.***

***Applications should be supported by an appropriate level of transport survey and assessment to inform the decision making process.”***

We note the change in the third bullet point at 4.3.2 from:

- *Options to improve resilience at the Dawlish coastal mainline route include a long term (2030+) strategy for completion of an alternative route to the north of Dartmoor through Okehampton, Coleford Junction and Tavistock. Given substantial uncertainty at this time, and limited risk of the potential route being prejudiced by development, land has not been identified for this purpose within the Local Plan.*

To

- *Long term options (2030+) include reopening the Okehampton, Coleford Junction, Tavistock to Plymouth route north of Dartmoor.*

Whilst most of the Bere Alston - Tavistock - Okehampton (‘North Dartmoor’) is a long-distance footpath / cycleway (and thus relatively protected by the new Policy 4.3 (2)), we remain very concerned about the failure of the Regulation 18 and Regulation 19 Local Plans to safeguard land for the strategically important North Cornwall Parkway station at the A30/A386 Sourton junction (a site just within the National Park’s boundary).

The NPPF is clear that in preparing local plans, local planning authorities should work with neighbouring authorities and other external stakeholders to identify changing and future transport needs, particularly in regard to sustainable transport (walking, cycling and public transport):

**Para 104** of the NPPF is explicit that in preparing Local Plans ***“Planning policies should:***

***b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;***

***c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;***



**e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.**

With regard to the Bere Alston - Tavistock - Okehampton ('North Dartmoor') route, the Peninsular Rail Task Force's last published timeline (February 2017) <https://peninsularailtaskforce.files.wordpress.com/2017/06/prtf-20-year-plan-timeline-27-02-17.pdf> shows the entire Bere Alston - Tavistock - Okehampton ('North Dartmoor') route (including the North Cornwall parkway station at the A30/A386 Sourton junction) completed by 2032, 1 year within the Dartmoor Local Plan period (2019-2033). Signatories to the Peninsular Rail Task Force include Cornwall Council, Devon County Council, Somerset County Council and Plymouth City Council, as well as Torbay Council and the Local Economic Partnerships (LEPs) for Cornwall and the Heart of the South West, all of which DNP has a statutory 'Duty to Cooperate' with on Strategic planning matters under the Localism Act, a Duty further emphasised by the **NPPF (paras 24-27 as well as para 104 (above))**.

The reopening is also supported by *Railfuture South West* (<https://www.railfuture.org.uk/article1503-The-case-for-Okehampton>), Gerard Duddridge's *South West Rail Strategy*, (R.D.S., 2000) (a copy of which is in D.N.P.A.'s reference library) and by the *Campaign for Better Transport*, which lists the Bere Alston - Tavistock - Okehampton 'North Dartmoor' route in its "Top 12 Rail Line Reopenings" ( <https://bettertransport.org.uk/our-top-12-rail-line-reopenings> )

As noted above, Paragraph 104 of the NPPF explicitly states that "*Planning policies should... be prepared with the active involvement of... transport infrastructure providers and operators and neighbouring councils*" and should **"identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; and "provide for any large scale transport facilities that need to be located in the area"**.

Given that the Dartmoor Local Plan will last until 2033 and given that the Peninsular Rail Task Force's published timeline shows the entire route (including a North Cornwall parkway station at the A30/A386 Sourton junction) completed within the Dartmoor Local Plan period (2019-2033), we would continue to urge DNP to consult with all neighbouring authorities (and particularly Cornwall and Plymouth) on their needs for a resilient rail connection to the rest of the UK and what part DNP can play in assisting this objective through the Local Plan process. Certainly given the current incomplete nature of the published Evidence Base on the Transport topic and the lack of a relevant Statement of Common Ground on Transport, we would continue to argue for Policy support for rail reinstatement, and particularly for the North Cornwall Parkway station at the A30/A386 Sourton junction, a key strategic site that must be safeguarded.

Further consultation with relevant stakeholders (including the *Peninsular Rail Task Force*, *Railfuture South West*, the *Campaign for Better Transport* and *Sustrans*) and the relevant County and District councils may also indicate that some or all of the Teign Valley, Newton Abbot-Moretonhampstead and Princetown routes should be similarly protected, whether for rail reinstatement or for their potential as car-free footpaths or cycleways.

With regard to the first bullet point at **4.3.2**, regarding the potential Buckfastleigh – Ashburton rail-link, we would continue to request that this be amended to:

*"There has been a recent desire to explore whether the Buckfastleigh to Totnes heritage line could be extended to its original Ashburton terminus. **It is recognised that such a link could result in considerable public benefits, not least for the potential to deliver car-free footfall into the National Park and due to the likely uplift to Ashburton's economy. It is also recognised that such a link might provide for high quality walking and cycling networks and supporting facilities.** The option for this exists through the identification of land at Chuley Road for redevelopment."*



## **Chapter 7 (Towns Villages and Development Sites)**

We welcome and strongly support **Proposal 7.17 (2) Land at Station Yard, South Brent**, setting aside land to safeguard the opportunity for a new railway station at South Brent and associated car park. We had failed to notice this Proposal in our consultation response to the Regulation 18 Draft Local Plan.

Save for a change of Proposal number from 7.4(1) to 7.4(2), the Regulation 19 Final Draft Local Plan remains unchanged with regard to Land at Chuley Road, Ashburton.

### ***Proposal 7.4 (2) Land at Chuley Road, Ashburton***

***1. An area of land at Chuley Road is identified for redevelopment for mixed use. Within this area, development will be approved where it is informed by and responds to:***

***A) the local need for affordable housing***

***B) the economic vibrancy of the area***

***C) traffic movement, and public and private parking needs***

***D) opportunities to conserve and enhance the sites' railway heritage***

***E) opportunities to improve sustainable transport links***

***F) opportunities to enhance the quality of the built environment and the public realm; and***

***G) wildlife and habitat conservation and enhancement opportunities.***

***2. Applications should be supported by:***

***A) a Flood Risk Assessment which includes consideration of climate change and demonstrates that any development will be safe, not increase flood risk elsewhere, and where possible reduces flood risk overall; and***

***B) evidence to inform an appropriate assessment (Habitat Regulations) in order to establish that development of this site will have no adverse impact on the South Hams Special Area of Conservation.***

Given that the extension of the South Devon heritage railway back to Ashburton is not yet committed, we are generally supportive of this draft Proposal. Nevertheless, with regard to our comments on sustainable transport (Chapter 4), we would continue to ask that point D) be amended to:

***D) opportunities to conserve and enhance the sites' railway heritage (buildings, the spaces between them and the former railway formation)***

We would continue to seek that land be identified and safeguarded in Section 7 of the Local Plan, in association with the Peninsular Rail Task Force and relevant authorities, for the proposed North Cornwall Parkway station at the A30/A386 Sourton junction.