

COMMENT FORM

Final Draft Local Plan Consultation: 16 September – 1 November 2019

Your comments will help us and the Inspector to identify any issues with the Plan relating to soundness, legal compliance and compliance with the Duty to Cooperate, and any changes to the Plan which may therefore be needed prior to adoption. Please carefully read the [accompanying guidance](#) before answering the following questions.

Responses must be received by 5pm on Friday 1st November 2019 for your comments to be taken into account. View the Dartmoor Local Plan (2018-2036) Final Draft at www.dartmoor.gov.uk/localplanreview,

PART A - About You

Personal details

First name *	Ed							
Surname *	Persse							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident		An agent	X	A Town / Parish Council		An organisation	
	A business		A visitor		A statutory agency		Other (specify below)	
Other								
Job title (where relevant)	Planning Consultant							
Organisation (where relevant)	EJFP Planning Ltd							
On behalf of (where relevant)	Landowners							
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes	X	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

PART B - Your Comment

Please carefully read the [accompanying guidance](#) before answering the following questions.

Your comments should relate to specific areas of the plan, so please tell us the policy or paragraph number that your comment relates to. If there are areas which you believe not to be sound or legally compliant, please tell us why, and what changes you deem necessary, sharing any evidence you have to support your proposed changes.

If this is a report or any other document which cannot be shared via this form then you can email it to us at forwardplanning@dartmoor.gov.uk.

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

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	7.5(2) & 7.6(2)
Policies Map	

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

	Yes	No
i) Legally compliant		
ii) Sound		X
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above.

Fully explain your reasoning and try to be as precise as possible.

While there is no objection to the two allocations (already allocated as part of the DPD), the concern is that both sites are currently subject to live planning applications and are likely to be developed or partially developed by the time the draft plan is adopted.

The plan sets out in policy 3.1(2) that there is an indicative housing delivery figure of 65 homes a year across the park. Accordingly, it is expected that the delivery will predominantly be provided in the local centres. It is logical that Buckfastleigh should have its proportion of new dwellings in order to meet the figure set out in policy 3.1(2). The two sites are unlikely to contribute on the basis that they will have been developed out before the draft plan is adopted.

Therefore, the purpose of this comment is to promote the site off Oaklands Park DNP16/066.

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4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

The site at Oaklands Park DNP16/066, is well related to the existing development of Oaklands Park, and any development would be seen in conjunction with the Oaklands Park which lies to the east of the proposed site. To the north of the site, there is more housing and development bounded with mature trees. Accordingly, the main views would be from the south and west where the development would be seen against the backdrop of the housing and landscape features to the north and east. There would be no long views from the east or north.

Regarding access, the roads leading to the site are fairly narrow; however, this is typical of many of the roads serving developments in Buckfastleigh. This should not be a bar to development.

The site is flat and therefore readily developable and without the constraints of developing a sloping site which can cause issues with viability.

The topic paper highlighted the following points in terms of housing in Buckfastleigh

- Latest Housing Needs survey notes the requirement for 38 homes (73% of which 2-bed units)

- There is a lot of 'hidden housing need' in Buckfastleigh with a need for a greater mix of tenure and sizes of dwellings - in particular, smaller units of rental and shared ownership to meet the needs of downsizing and newly formed households.
- There is a need for more integration of market homes and affordable units – as opposed to the large former council estates which dominate some areas of Buckfastleigh.

The topic paper states in relation to that it is not allocated 'Given preferable alternatives this site is not necessary for allocation'. Given that the proposed allocations referred to above are unlikely to be available as a result of being developed out by the time the plan is adopted, site DNP16/066 should be allocated to help address the problems highlighted above.

Access has been raised as a concern; however, the school use of the site will generate traffic movements to and from the site. When compared to the existing number of potential users from the Oakland Park estate (900 - 1200 per day) the development of DNP 16/066 will represent a small increase. The LAA consideration for the site confirmed that the development of the site would be acceptable from a highways' perspective.

The site is available for development; it will not have an adverse impact on the landscape given that it would be viewed in the context of the adjoining development, access to the site is considered to be an issue, the site has few development constraints, it is flat, and it is in flood zone 1.

Accordingly, the site should be allocated in the draft local plan.

Concerning the other sites that have been considered for potential allocation in topic paper 9 under the site assessment & allocation recommendations; the following represents reasons why the sites mentioned below are not as good as the site off Oaklands Park DNP16/066

As previously mentioned BCK1 and BCK2 will have been developed out by the time the plan is adopted.

DNP 08/009-it is considered that the site would be visible from the East and would appear to significantly extend Buckfastleigh into the adjoining landscape. Additionally, there are concerns relating to the greater horseshoe flight path and the impact of the development upon these flight paths.

DNP 14/093-would be extremely visible in the landscape, appear disconnected from the heart of Buckfastleigh and close the gap between Buckfastleigh and Buckfast. Again concerns are raised regarding the greater horseshoe bat flight paths and the potential impact of the development of the site on those flight parts.

DNP 16/038-the site would extend Buckfastleigh out into the open countryside, access to each of the sites is generally poor and would be insufficient to cater for the scale of development that could take place on the sites.

DNP 14/076-the site is not located in a local centre; there are likely to be significant heritage, contamination and viability issues which will compromise any future housing development on the site. The site also lies in flood zones three and two, therefore restricting the development potential of the site.

It is also worth noting that the existing development in Oaklands Park is intrusive in design terms and it is indeed a development of its time. The development of the 16/066 represents an

opportunity to improve this edge of Buckfastleigh through high-quality design and achieving a robust landscaped boundary to the edge of the settlement.

It is requested that these sites referenced DNP 16/066 is allocated in the local plan for housing development. The allocation of the site would assist the National Park authority in meeting its requirements to deliver an indicative number of 65 houses a year within the National Park. Buckfastleigh is a local centre and therefore is a settlement in which such development should take place indeed the strategic policy 1.4 (2) set local centre at the top of the hierarchy for housing development. The site is well related to Buckfastleigh it is currently available and has limited development constraints and could be brought forward in the early part of the plan period in order to assist meeting the identified housing need.

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Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

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

<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input checked="" type="checkbox"/>	Yes , I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

To make the case to the Inspector

Thank you for sharing your comments on the final draft Local Plan for Dartmoor. If you have more comments to share, please complete parts C-F below.

Following this consultation, the final draft Plan along with all comments made will be submitted for examination by a Planning Inspector. The Inspector will consider whether the plan complies with the relevant legal requirements and whether it is sound (see guidance). Keep up to date on our progress by [signing up to our Local Plan consultee list](#), and following us on Twitter [@DartmoorPlan](#) and Facebook [/DartmoorPlan](#)

PART C - Additional Comment (1)

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

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

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

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

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

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[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]

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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

PART D - Additional Comment (2)

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

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Policy (enter number, e.g. 4.5)	
Policies Map	

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[Additional space on final page]

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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)	
Policy (enter number, e.g. 4.5)	
Policies Map	

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

	Yes	No
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ii) Sound		
iii) Compliant with the Duty to co-operate		

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[Additional space on final page]

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<input type="checkbox"/> No , I do not wish to participate in hearing session(s)	<input type="checkbox"/> 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.

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)	
Policies Map	

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	Yes	No
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ii) Sound		
iii) Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

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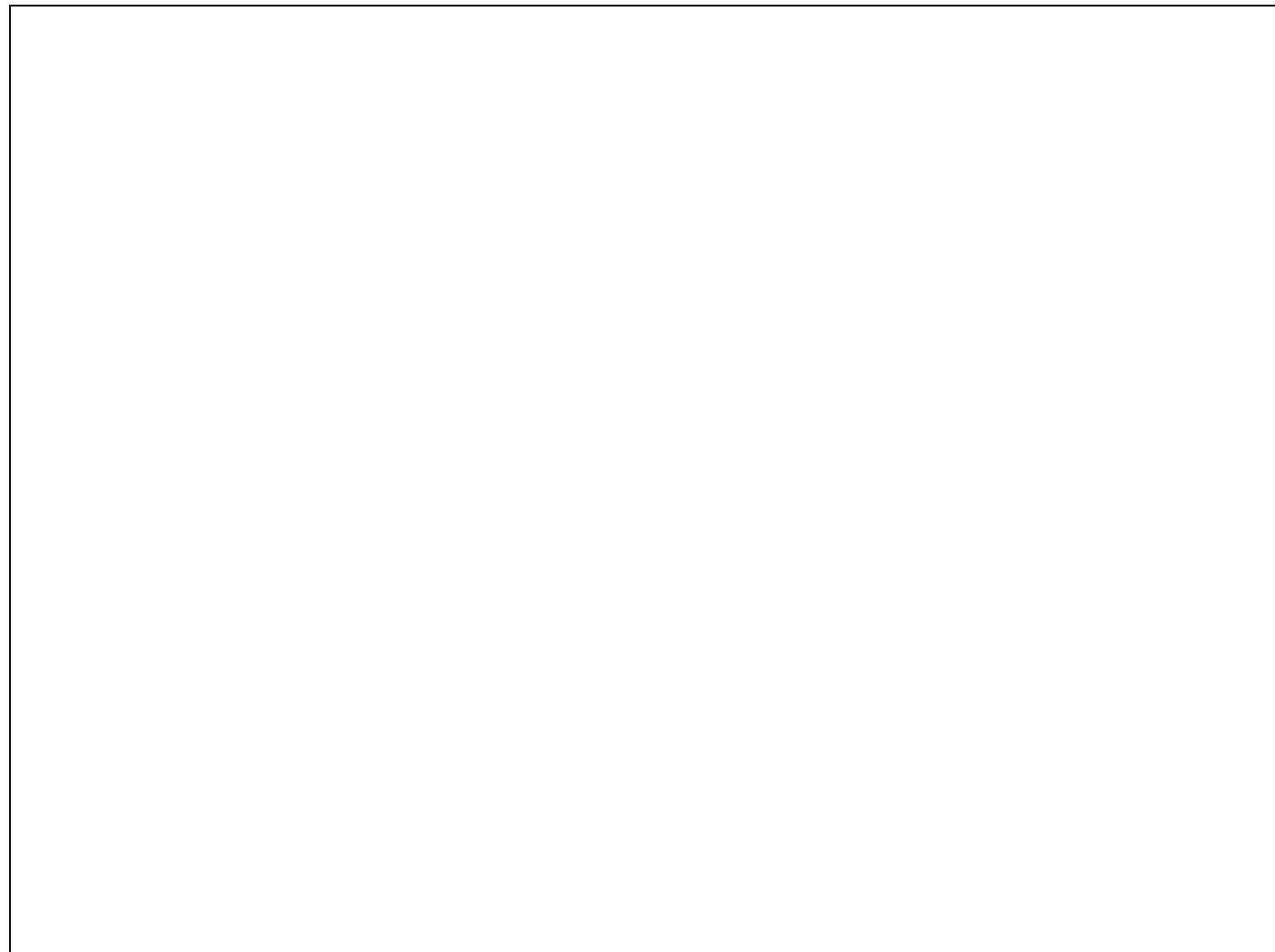
Please note: where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

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<input type="checkbox"/>	No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>	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.

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



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

Forward Planning, Dartmoor National Park Authority Tel: 01626 832093
Parke, Bovey Tracey, Devon, TQ13 9JQ

Email: forwardplanning@dartmoor.gov.uk

Website: dartmoor.gov.uk/localplanreview