

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 *	Christopher							
Surname *	Tofts							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident	<input type="checkbox"/>	An agent	<input type="checkbox"/>	A Town / Parish Council	<input type="checkbox"/>	An organisation	<input checked="" type="checkbox"/>
	A business	<input type="checkbox"/>	A visitor	<input type="checkbox"/>	A statutory agency	<input type="checkbox"/>	Other (specify below)	<input type="checkbox"/>
Other								
Job title (where relevant)	Director							
Organisation (where relevant)	Cornish Chamber of Mines and Minerals							
On behalf of (where relevant)								
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	X	<input checked="" type="checkbox"/>		

* Required field

Data Protection Act 2018

Your personal data will be securely held by Dartmoor National Park Authority for the purpose of assisting with the Local Plan Review process. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has commented on the plan. For the purposes of the examination, we will share your personal details and representation with the Inspector appointed, and publish your name and representations as part of a report on our website. For more information please refer to our [Forward Planning Privacy Notice](#).

Tick the box below if you would like to be added to our Local Plan consultee database and kept up to date with the Local Plan Review process and other planning policy matters.

X - 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)	6.1.4
Policy (enter number, e.g. 4.5)	6.1(1)(1)
Policies Map	

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

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

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

The policy and supporting text amendments from the first draft (Reg 18) introduce a lower threshold of "large scale" to which a version of the NPPF para 172 'major development test' is to be applied. The relevant topic paper explains that this is to avoid confusion with the 'major development test'. However, the lowering of the threshold from 'major' to 'large scale' means that the approach is inconsistent with the NPPF.

We are not aware of any assessment having been made to support this change. There is no basis for introducing a similar test to para 172 NPPF for development that is not major.

The definition of 'small scale' is unhelpful in resolving the issue highlighted above as it does not consider the effect of the proposed development, only the existing size when compared with other development in the NPA.

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.

Policy 6.1(1)(1) should be deleted in its entirety, Policy 1.5(2) is sufficient to address 'major' development. Alternatively a qualitative assessment should be introduced into the policy for minerals development (including the definition of 'small scale').

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

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

No , I do not wish to participate in hearing session(s)	x	Yes , I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

So as to ensure that the Local Plan's policies (and supporting text) on minerals development is appropriate.

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.

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

Additional Comments

The plan appears to have an underlying tone that minerals development is automatically harmful to the NPA. The plan lacks a qualitative assessment approach to the effects of proposed minerals development.

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

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Email: forwardplanning@dartmoor.gov.uk
Website: dartmoor.gov.uk/localplanreview