



Dartmoor Local Plan (2018 - 2036) Examination

ED20 DNPA Hearing Statement 6 Economy

Matters, Issues and Questions

Whether the Local Plan has been positively prepared and whether it is justified effective and consistent with national policy in relation to its approach to the local economy.

Issue 1 Delivery of employment

Q1. How has employment need been assessed and has it been undertaken in a robust manner?

1.1 The employment need for Dartmoor has been assessed robustly in accordance with the NPPF and National Planning Practice Guidance. DNPA's evidence base comprises primary evidence and a topic paper which analyses and assesses these in a combined way to make robust policy recommendations. Using the guidance set out in NPPG Paragraph: 026 (Reference ID: 2a-026-20190220) the following summarises how DNPA has assessed employment need while developing the Plan.

- The best fit functional economic market area was established by the 2017 Economic Development Needs Assessment [SD147] at section 2
- the existing stock of land for employment uses within the area was reviewed in the 2018 Employment Land Review (ELR) [SD148] at section 4 and the Economy Topic Paper [SD108] at section 3;
- the recent pattern of employment land supply and loss was assessed in the 2018 ELR at section 4 and the Economy Topic Paper at section 3;
- evidence of market demand (including the locational and premises requirements of particular types of business) was gathered from multiple sources, including the 2015 DR Business Survey, 2013 Sectors Research [SD154], LEP research, and direct consultation as part of the 2018 ELR.

- wider market signals relating to economic growth, diversification and innovation were identified by 2017 Economic Development Needs Assessment which identified growth scenarios. These were then analysed by the 2018 ELR and Economy Topic Paper .
- any evidence of market failure was appraised through the site assessments within the 2018 ELR and is also identified in discussion and analysis of evidence throughout the Economy Topic Paper

1.2 DNPA's Topic Paper – Economy [SD108] is cited in the 2020 Planning Advisory Service (PAS) national best practice guidance ('Evidence for Plan Making'¹) – Case Study 5: Economy Topic Paper: specific, appropriate, and proportionate.

Q2. Has the need for employment been translated into a requirement for floorspace and land? How has this been calculated?

2.1 The Economic Development Needs Assessment [SD147] translates growth scenarios into a requirement for floorspace at Appendix 8 Section 3, the methodology for doing this is set out at section 7.

2.2 These figures are then analysed in the 2018 ELR [SD148] section 9. Para 9.12 provides an assessment of how this new stock is expected to be delivered by replacement/renewal, new B1(a,b,c) and new B8 floorspace. The vast majority is expected to be delivered by replacement and renewal (c70%).

2.3 Later in the 2018 ELR [SD148] and within the Economy Topic Paper [SD108] this is assessed further to formulate appropriate and robust policy recommendations in balance with the demographic projections [SD128 and SD129], land availability assessment and environmental constraints. With regards site allocations, the Development Sites Topic Paper [SD109] assesses allocations which can assist meeting the identified need.

2.4 Developing a specific land requirement figure was considered not reasonable due to the small number and wide variety of employment sites on Dartmoor. A single figure would not represent accurately the wide variety of employment sites across Dartmoor. Instead, a policy approach which provides clear opportunities for development (with a broader scope than extant policy) and aligns with market needs is considered the most flexible and positive way to enable delivery.

¹ Evidence for Plan Making (PAS 2020)

https://www.local.gov.uk/sites/default/files/documents/PAS_Evidence%20for%20Plan%20Making_1.0.pdf

- Q3. Does the Plan provide an appropriate mix of employment uses that is supported by robust evidence?
- 3.1 The Local Plan supports employment uses in appropriate locations. The Economy Topic Paper [SD108] discusses evidence for employment uses most common to the Dartmoor economy in turn and these are reflected in the Plan's policies in Chapter 5. The general distribution of employment uses throughout the National Park is summarised at 5.2.4 and this is supported by evidence in the 2018 ELR [SD148] and the Settlement Profiles [SD192 to SD234].
- 3.2 Options for the spatial strategy for new and replacement employment uses are discussed in the 2018 ELR at 9.20. Further assessment of spatial strategy options, including for uses not covered by the ELR, are discussed and assessed throughout the Economy Topic Paper, most significantly at 5.6.13 and 6.3.
- 3.3 The Plan is not prescriptive on setting targets for land use; this recognises that the small levels of development involved mean targets are not appropriate and instead a flexible approach gives the greatest opportunity for proposals to come forward in line with the strategy and the Plan as a whole.
- Q4. Does the policy framework provide an appropriate and justified approach to the retention of existing land and buildings in employment use?
- 4.1 It is expected that the vast majority of economic development needs on Dartmoor will be met through renewal and replacement of existing stock (see response to Q2, above). The 2018 ELR [SD148] assesses employment sites across Dartmoor and develops recommendations for their protection, redevelopment and release. The ELR recommends to protect the majority of these to ensure they continue to meet Dartmoor's employment needs, paragraph 6.9 suggests safeguarding the majority of sites. At 6.10, the ELR identifies sites that are underutilised, have low occupancy levels and/or potential for new employment development. The recommendation to safeguard employment sites is considered further later in the ELR, at paragraph 9.34 and 9.35.
- 4.2 Part 4 of Policy 5.1 (2) provides a flexible approach to safeguarding employment sites. It allows the Authority to determine applications involving loss of employment on a case-by-case basis with consideration for the National Park's broader business and industry needs. Policy 5.1 (2) also allows for renewal of and small scale extension of existing employment sites across the National Park, in locations associated with settlements and in the open countryside, which provides flexibility for businesses.
- 4.3 Main town centre uses in Town Centres are protected by the proposed amendments to Policy 5.3 (2) set out in DNPA's report 'Implications of Use Class Order amendments on the Dartmoor Local Plan' [ED10]. The proposed approach provides additional flexibility for changes of use in

Town Centres in accordance with the Government's amendments to the Use Class Order and the new broader use Class E. The policy now allows flexibility for change of use between main town centre uses, but protects against change of use to non-main town centre uses to ensure the vitality of these centres is protected for the benefit of residents and visitors. It should be noted that DNPA believes there is a case for stronger protection for certain uses to help ensure the future sustainability of communities and their services. As we say in our report [ED10]:

"It is regrettable that it is not now possible to protect the type of service provision beyond Class E, as in many cases this was a popular community aspiration."

- Q5. Overall, is the strategy for employment aligned with the Plan's indicative housing delivery figure/ requirement figure?
- 5.1 As discussed in section 4 of the Economy Topic Paper [SD108] there is a mismatch between strategic growth forecasts and the identified demographic trends on Dartmoor. The issues are summarised well at paragraph 4.7.2 to 4.7.4. This informs the Housing Strategy's focus on affordable housing, and the additional flexibility we have introduced to the definition of a 'local person' enabling more local workers to live in the National Park, as expressed in the Plan and evidence.
- 5.2 Aligning the National Park's indicative housing delivery figure with the employment strategy is complex and is discussed in the Housing Topic Paper [SD106] at section 4.6. Given the factors described at 4.6.11 of the Housing Topic Paper [SD106] it was not considered reasonable and proportionate to undertake further analysis.

Issue 2 SP 5.1(2) Non-residential businesses and tourism

- Q1. Would the policy provide sufficient flexibility, to enable businesses to respond to market conditions, meet the needs of the area and make best use of existing employment sites?
- 1.1 The spatial strategy options for employment uses in the Local Plan are considered in detail in the 2018 ELR at 9.14 and Economy Topic Paper [SD108] at 5.6.13 and 6.3. The recommended approach is considered an appropriate balance between meeting the needs of Dartmoor's economy and ensuring conservation and enhancement of the National Park's Special Qualities in accordance with national policy and National Park purposes.
- 1.2 In response to the challenges Dartmoor's economy faces, as summarised in paragraph 5.1.2 of the Plan and explored in detail in the Economy Topic Paper, and after careful balancing with the National Park's constraints Policy 5.1 (2) introduces greater flexibility for businesses to meet their needs than current policy in the following areas:
- Greater flexibility for new businesses to establish in locations adjoining the settlement boundaries of Local Centres and Rural Settlements, a new settlement tier, in contrast to that permitted under extant policy COR18.
 - A broader range of employment uses are potentially supported within the open countryside, provided these are appropriate for their location.
 - Monitoring effectively over the Plan period in order to ensure the policies are effective, and to identify any new issues in respect of Dartmoor's economy and business needs
- Q2. Is a modification required, to ensure that the Plan is sound, in light of the recent changes to the UCO?
- 2.1 Modifications are required and these are set out in DNPA's paper: Implications for the emerging Dartmoor Local Plan following amendments to the Use Class Order [ED10].

Issue 3 SP 5.2(2) Town centres

- Q1. Is a modification required, to ensure that the Plan is sound, in light of the recent changes to the UCO?
- 1.1 Modifications are required and these are set out in DNPA's paper: Implications for the emerging Dartmoor Local Plan following amendments to the Use Class Order [ED10].
- Q2. Would this policy, in supporting the 'town centre first approach' be likely to stifle small scale employment development adjacent to Local Centres, which is promoted in SP5.1(2)? Would the size threshold for requiring main town centre uses to follow the sequential test be justified by the evidence?
- 2.1 The town centre sequential test is an important part of national policy and its application will assist the long-term sustainability of Dartmoor's town centres. The sequential test will guide the application of policy 5.1(2) to ensure new development that is able to be located in town centres, and thereby supports their vitality, as required to do so. The sequential approach ensures that development opportunities take place in the most appropriate location.
- 2.2 Evidence to support the threshold for the Town Centre sequential test is set out at section 6.4 of the Economy Topic Paper [SD108]. The 150m² threshold selected is considered reasonable and justified and of a scale appropriate for Dartmoor's town centres, which often comprise many uses smaller than the threshold. It is considered to comply with paragraphs 86 to 88 of NPPF.
- Q3. Would the policy effectively manage the impacts of conversion of agricultural buildings to flexible commercial uses in the open countryside?
- 3.1 Policy 5.2 (2) relates to Town Centres only. Policy 2.7 (2) manages conversion of historic non-residential buildings in the countryside and the justification for this policy is set out in paragraph 3.8 of the Historic Environment Topic Paper [SD102].
- 3.2 Historic buildings policy 5.1 (2) manages the establishment of new businesses in the open countryside. In the open countryside and villages and hamlets it allows for new businesses to establish in converted redundant buildings for uses appropriate for their location. 'Redundant building' is a defined term in the Local Plan's glossary. The justification for this is provided within section 2 and 3 of the Economy Topic Paper [SD108], specifically at paragraph 2.2.4 and 3.5.2.

Issue 4 SP 5.3(2) Shops and other active uses

- Q1. What modifications are required to this policy to reflect recent changes in the UCO? In light of these, would the policy approach to generally protect shops, financial and professional services, food, drink and drinking establishments be justified and accord with national policy?
- 1.1 Modifications are required and these are set out in DNPA's paper: Implications for the emerging Dartmoor Local Plan following amendments to the Use Class Order [ED10].
- 1.2 The NPPF (para 83) requires planning policies to enable the retention and development of local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 1.3 As discussed in our paper on the Use Class Order amendments the changes introduced by Government make it difficult to now protect services and facilities in the same way as was traditionally achieved by the planning system. One such example is that planning permission would not be required to change the use of a meeting hall to a shop selling essential goods where no such similar facility existed within a 1km radius. Another is that existing shops can now change use to office or light industrial uses without the need for planning permission. As a result of this there is a question over whether Local Plans have the national legislative framework to be able to achieve national policy ambitions.
- 1.4 DNPA's amended policy proposes protection for local services and facilities which is consistent with flexibility introduced by the recent Use Class Order amendments. We would welcome a discussion with the Inspector as to the extent with which this approach now accords with national policy.

Issue 5 Policy 5.4(2) Tourist accommodation and SP 5.6(2) Camping and touring caravan sites and Policy 5.5(2) Staff accommodation for serviced accommodation businesses

- Q1. Is a modification required for soundness to reflect the different impacts of camping pods, shepherd huts and other structures compared to camping and caravan touring sites and to control the impacts of unoccupied stored structures? Should the policy support newer forms of non-permanent tourist accommodation?
- 1.1 DNPA does not believe a modification is necessary. This issue is discussed at section 5.5 of the Economy Topic Paper [SD108]. The principal issue is that these structures are not compatible with the landscape character of the National Park, in particular the valued attributes described in Dartmoor's Landscape Character Assessment [SD113]. The issue is the same for any isolated building, historically shepherd huts or pods were not a feature of Dartmoor's farming landscape and, as such, their introduction can harm the National Park's landscape character and the extent to which it can be seen and experienced.
- 1.2 Caravans, shepherds huts and camping pods are all similar types of structure with fundamentally the same potential for impact. Whilst their design may differ, their size, scale, and degree of permanence are comparable and for the purposes of assessing the impact of a new site with these structures, the planning considerations are the same. DNPA believe it is therefore appropriate to consider them together under Policy 5.6 (2).

Issue 6 SP 5.7(2) Agriculture, forestry and rural land based enterprise and SP 5.8(2) Farm diversification, SP 5.9 (2) Equestrian development

- Q1. Would these policies strike the right balance between supporting these businesses whilst conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park? Would the policies be effective, justified by the evidence and consistent with national policy?
- 1.1 DNPA has undertaken detailed consideration of these policies within the Economy Topic Paper [SD108].
- 1.2 The evidence supporting Policy 5.7 (2) is discussed in detail at section 6.6 of the Economy Topic Paper and section 8 of the Natural Environment Topic Paper [SD101]. The policy remains broadly consistent with existing policy except for details which are discussed at paragraph 8.2.3 to 8.2.5 of the Natural Environment Topic Paper. The scope of the policy has been broadened slightly to include 'rural land-based enterprises' to reflect the NPPF paragraph 83 and recent decisions which highlight that other types of land-based enterprise can also justify development of this nature, for example horticultural enterprises.
- 1.3 The evidence supporting Policy 5.8 (2) is provided at section 6.7 of the Economy Topic Paper. An additional criterion to existing policy has been added to ensure there is a clear measure of what is considered to be a farm able to benefit from farm diversification. The policy is considered consistent with NPPF paragraph 83.
- 1.4 The evidence supporting Policy 5.9 (2) is provided in detail at section 9 of the Natural Environment Topic Paper and section 6.10 of the Economy Topic Paper. This policy introduces further management requirements to ensure this type of development does not harm the National Park's Special Qualities and can continue to make a value contribution to the National Park's economy.