From: Tristan Peat [mailto:

Sent: 01 November 2019 18:21

To: Forward Planning - mbx <forwardplanning@dartmoor.gov.uk>

Cc: Jenny Clifford

Subject: Dartmoor National Park Local Plan Consultation / Regulation 19

Dear Dan,

Please accept my apologies for this late response to your consultation.

Mid Devon District Council has been engaged through the preparation of the Dartmoor National Park Local Plan and we have previously provided comments to assist you with this. This has included your policy for the provision of Gypsy and Traveller sites, policy affecting development at Cheriton Bishop, landscape, and also more recently the agreed Statement of Common Ground with regards housing provision and the ongoing preparation of the Greater Exeter Strategic Plan.

We have previously been satisfied with the revisions made to the Dartmoor National Park Local Plan and I do not wish raise any further comments in relation to this Regulation 19 stage draft.

Regards,

Tristan

Tristan Peat | Forward Planning Team Leader |

From: Tristan Peat [mailto

Sent: 04 February 2019 14:50

To: Forward Planning - mbx <forwardplanning@dartmoor.gov.uk> **Cc:** Jenny Clifford Cllr Richard Chesterton

Arron Beecham

Subject: Dartmoor Local Plan 2018 – 2033: First Draft (Regulation 18 consultation) / Comments from Mid Devon District Council

Dear Mr Janota,

I refer to the consultation on the Dartmoor Local Plan 2018 – 2033 First Draft (regulation 18 consultation).

Thank you for providing an opportunity to comment on the emerging Dartmoor Local Plan Review. Continued close working with the Dartmoor National Park Authority is welcomed, as required under the Duty to Cooperate, which requires that partners engage constructively, actively and on an ongoing basis with other authorities and certain prescribed organisations in relation to strategic matters when preparing local plans. The 2018 National Planning Policy Framework has introduced a requirement to evidence effective joint working through a statement of common ground. A Duty to Cooperate meeting was held on 18 October 2018 and on the basis of the useful discussions during the meeting, We consider that Dartmoor National Park Local Plan has satisfied the requirements of the duty to date.

Mid Devon District adjoins the Dartmoor National Park Local Plan Area along its southern boundary. However, a small part of the district also falls within the Dartmoor National Park, at Cheriton Bishop. Notwithstanding this overlap, the two areas share a strong geographical relationship in terms of landscape and settlement morphology, local character and the historic environment. In light of this, I wish to make the following comments for Mid Devon District Council:

Spatial Strategy

The emerging spatial strategy for the Dartmoor Local Plan is supported. This identifies Cheriton Bishop as a rural settlement which has relatively good access to services and is better placed to meet the development needs of the settlement and the surrounding parish. A settlement limit is identified, but no allocated development sites are proposed. This is consistent with Mid Devon's Local Plan Review which designates Cheriton Bishop as a village considered appropriate for a limited level of development, based on its physical characteristics, and the availability of educational, convenience and transport services. It is considered that both plans will enable Cheriton Bishop to continue to develop in such a way that it meets local needs and supports vibrant rural communities.

Strategic Policy 2.1 (1) Protecting the character of Dartmoor's Landscape

The overarching aim of the policy is supported, where all development should conserve and/or enhance the character of the Dartmoor landscape. However, the introductory supporting text could benefit from making clear that planning decisions made outside the Dartmoor National Park will be the responsibility of the respective Local Planning Authority. The Dartmoor National Park Authority will be a consultee on such development proposals. Policies S1, S9 and DM27 of the submitted Mid Devon Local Plan Review that is currently being examined include provision for protecting and enhancing valued landscapes and its setting, including the Dartmoor National Park.

Strategic Policies 3.3 (1) Housing in Local Centres and 3.4 (1) Housing in Rural Settlements

It is unclear how 45% affordable housing can be secured on sites of up to 5 dwellings in Local Centres and 3 dwellings in Rural Settlements. National policy sets out that the provision of affordable housing should not be sought for residential developments that are not major developments (i.e. 10 or more dwellings), other than in designated rural areas (where the policies may set out a lower threshold of 5 units or fewer). Whilst the lower threshold is applicable for the Dartmoor National Park Plan Area, it is unclear how affordable housing will be secured on sites of 5 dwellings or fewer.

Policy 3.11 (1) Gypsy and Traveller Accommodation

Criterion 2 stipulates that 'Permanent and transit sites must be within, adjoining, or well-related to a Local Centre or Rural Settlement. Applications should demonstrate that no suitable alternative site exists outside the National Park'. It is considered that this imposes an impossible test on applications for gypsy and traveller accommodation which results in a policy context that is overly restrictive. It is currently unclear how applicants could demonstrate that no suitable alternative exists outside the National Park.

I hope these comments are useful in progressing the preparation of the new Dartmoor Local Plan. If you have any questions please do not hesitate to contact me.

Yours	sincer	ely,
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Tristan Peat

Tristan Peat | Forward Planning Team Leader |