

BRIDFORD PARISH COUNCIL

c/o Forward Planning
Dartmoor National Park Authority
Parke
Bovey Tracey
Newton Abbot
TQ13 9JQ

1 February 2021

Email: programmeofficer@dartmoor.gov.uk

Dear Ms Barrett

Dartmoor Local Plan 2018-36

We very much welcome your Note 3: Matters, Issues and Questions dated 12 January 2021 because among other things you raise a series of matters which we have previously raised, either in our letter dated 4 February 2019 in response to the Regulation 18 consultation and / or in our letter dated 28 October 2019 in response to the Regulation 19 consultation. In particular we have previously said the following:

- “There does not appear to be any evidence that the draft Dartmoor Local Plan has been integrated with the surrounding areas in any way, indeed all of the indications are that it has been prepared on the assumption that Dartmoor exists as a remote island.”
- “There is no explanation for the requirement for 45 per cent of new dwellings on allocated sites to be affordable, why 45 per cent? Housing and affordable housing in particular needs to be matched with opportunities for employment.”
- “... housing delivery needs to be matched with opportunities for employment and the draft local plan for Dartmoor does not seem to include any policies for encouraging employment.”
- “The objective of protecting tranquillity and dark night skies can be met with good design which includes down lighters, low energy lamps and PIR controls and does not require a ban on external lighting.”
- “The government has forecast that in just over ten years time 50-70 per cent of all new cars and vans will be ultra low emission and will need EVCPs. The requirements for EVCP in the draft local plan look low now but they will soon be overtaken by events and will look quaint if not hopelessly inadequate long before the expiry of the plan in 2035.”
- “There are no policies for public EVCPs which, due to the lack of off street parking, will be required in all of Dartmoor’s communities.”

We have previously said that, in our opinion, Survey Monkey is not an appropriate tool for a public consultation about a complex document such as the Local Plan. The requirement to link responses to a specific paragraph gives the impression, borne out by our experience, that the DNPA is only prepared to consider minor revisions to its wording and that it is not going to consider any matters of principle. We are not experts in the obligations of planning authorities to carry out public consultations but suspect that if the DNPA has complied with the letter of the

law then it has not complied with the spirit of the law. We recognise that the DNPA cannot please all respondents all of the time but the 544 pages of responses to the second consultation suggests to us that the DNPA's procedures have been ineffective.

In our letter dated 4 February 2019 in response to the Regulation 18 consultation we raised concerns about a range of matters but none seemed to find their way into the DNPA's Summary of responses dated April 2019. In our letter dated 28 October 2019 in response to the Regulation 19 consultation we attempted a different tack and focussed all of our comments on just one matter, the DNPA's unjustified obsession with affordable housing.

We noted that a word search for "affordable" in the draft Local Plan produced 234 results and that this has remained unchanged so affordable housing permeates much of the Local Plan. We consider that our detailed comments about the misrepresentation and misinterpretation of data are all valid and that they should not have been summarily dismissed with references to the DNPA's Topic Paper 6 Housing and Topic Paper 8 Economy. We believe that Topic Paper 8 Economy is deeply flawed and that DNPA has significantly over estimated the size of the economy on Dartmoor and therefore its housing needs.

We accept that there are difficulties in sourcing economic data for Dartmoor. Much of the data in the Topic Papers is attributed to the ONS and the IDBR, however this data is published by unitary authority (South Hams, Teignbridge and West Devon) and so there is none available for Dartmoor. The ONS data has been broken down into parishes but their boundaries do not coincide with the boundary of the National Park. There is also some data prepared by third parties but they will all have encountered the same issues. There is mention of a narrower Dartmoor (and a wider Dartmoor?) but there is no explanation of how the data has been compiled. The DNPA has thrown conflicting data into Topic Paper 8 and has produced a confused picture.

Measuring headcount has become far more complicated than it used to be because the workplace has become far more flexible. The parent who works as a lunch time supervisor in a primary school, or who does a couple of hours of casual cleaning each week, or a pensioner who does some casual gardening for neighbours, or a volunteer who works one day a week in a charity shop might all be considered to be in employment and contributing to Dartmoor's Gross Value Added but none should be considered as a full time employee. The standard unit of measurement of headcount is a Full Time Equivalent (FTE). The key employment data on which the DNPA should be focussed on for purposes of the Local Plan is the FTE of employees with a place of work in Dartmoor.

The headcount has also been further complicated by the growing numbers of the self employed. At one time most of the self employed in Dartmoor would have found work in Dartmoor but this has ceased to be the case. There are growing numbers of the self employed who are engaged in new industries such as in the information economy, who generate all of their income from outside Dartmoor, who could live anywhere but choose to live in Dartmoor. Furthermore because Dartmoor provides so few opportunities for consumption the increasing numbers of the self employed provide negligible stimulus to its economy on either the supply side or the demand side – from an economic perspective they are no different to the increasing numbers of residents who commute to places of work outside Dartmoor and the retired. So the second piece of employment data on which the DNPA should be focussed is the total number of the self employed, commuters and the retired.

Table 2.2 Businesses and Employment in Dartmoor National Park by Sector, 2016, in Topic Paper 8 indicates that there are 11,741 jobs in Dartmoor held by a net total of 9,741 employees appears to be deeply flawed. Not only is it wrong to assume that that all employees are resident in the same locality as their employer but far more importantly we believe that the number of employees in Dartmoor has been significantly overstated. The DNPA has not provided a sufficiently detailed citation to enable the data to be verified but if we examine the line for 'Education' which is relatively easily understood we can see some obvious errors. The DNPA states that there are 35 businesses (ie, schools) providing employment for 2,004 members of staff representing 17 per cent of all employment on Dartmoor and an average of 57 members of staff in each school – none of which can possibly be correct. As far as we are aware there are only two secondary schools in Dartmoor, the South Dartmoor Community College and the Atrium Studio, both in Ashburton, employing a total of about 250. The remaining schools in Dartmoor comprise about 20 primary schools in its small towns and villages and by tallying the numbers of staff, including all non-teaching staff, as shown on their websites we find that the total number employed in Dartmoor is about 350. We believe that the total number employed in education in Dartmoor is about 600.

We can extrapolate from the chart on page 58 on the draft Local Plan that there are about 1,700-1,800 children of primary school age living on Dartmoor which would indicate a staff/pupil ratio of about 1:6 which feels about right. It is not credible that 17 per cent of all employment is in schools or that our small town and village primary schools could employ an average of more than 50 members of staff. So the number of schools appears to have been overstated by about 60 per cent and the numbers employed appears to have been overstated by more than 300 per cent.

There are further clues in Topic Paper 8 that the data for employment is fundamentally flawed:

- In paragraph 3.1.5 it is stated that the 2016 figure of 11,741 jobs represents a c.20 per cent increase on the comparable figure of 9,656 for 2012, following on from an increase of c.8 per cent between 2009 and 2012. It is not feasible that there could be a more than 30 per cent increase in employment in Dartmoor in only seven years. Indeed all of the anecdotal evidence is that far from there having been an increase in employment there has been a continuing decrease in line with the long term trend.
- In paragraph 3.1.6 it is stated that the education sector has an average of over 50 jobs per business (i.e. schools). How could anyone believe that our primary schools have an average of over 50 jobs – when, including all non-teaching staff, they generally have only 10-20 members of staff.
- In paragraph 3.3.1 there is table (Figure 2.5) which states that the number of jobs in the education sector in 2016 was not 2,000 but 2,600 and that, notwithstanding that the number of children of school age is forecast to remain stable – see page 58 of the Local Plan, the number of jobs is forecast to rise to 2,900 by 2036.
- In paragraph 3.2.2 it is stated that the estimated output per head in Dartmoor is £13,140 and about half of the national average. This figure, which represents the minimum wage, cannot be right.
- In paragraph 4.2.6 there is a table which shows employment by sector in 2017, and for education we are presented with yet another number, viz, 872.
- In paragraph 4.2.7 there is a table (Table 4) which states that the share of employment in education is 9 per cent which is consistent with the share in Devon, the region and England as compared with the 17 per cent in Table 2.2.

- In paragraph 4.4.2 it is stated that the resident population in employment in Dartmoor is 14,491 but that the workplace population is 12,122 and that the difference of just over 2,000 represents a net outflow of commuters. It then implies in a table that 8,559 commute out of Dartmoor to the top five destinations and so the gross figure could be in the order of (say) 10,000. Anyone who lives in Dartmoor will be able to confirm that the number of employees who commute to a place of work inside Dartmoor is negligible and is nowhere near the implied figure of 8,000.

If Topic Paper 8 had been subject to even the most cursory review process then, in our opinion, it would never have seen the light of day.

In our letter dated 28 October 2019 we drew attention to a long list of misrepresentations and misinterpretations in the draft Local Plan which all seemed designed to support to the DNPA's obsession with affordable housing. In our opinion all of the matters listed continue to be valid.

There is an obvious need for the DNPA to far better understand Dartmoor's population, its employment and its housing needs. There is plenty of evidence of a national shortage of affordable housing but the DNPA has failed to produce any credible evidence that there is a shortage in Dartmoor. We believe that the DNPA should abandon its obsession with affordable housing, its proposed target of 65 new homes per annum which is excessive, and its proposal for 45 per cent to be affordable which is unjustified.

Yours sincerely

Joan Banks

Signed and sent on behalf of Bridford Parish Council by Joan Banks
Clerk to Bridford Parish Council

