

Comments sent in, effects on wording of Final Draft, and MPC suggestions for change in Final Draft.

First draft: Policy and part	Our comment	Final Draft	MPC suggestions and added comments.
Strategic Policy 1.1 (1) (Delivering National Park purposes).	Support: Our recent local survey (copy attached) shows strong local support for this policy.	Policy slightly reworded but essentially unchanged.	
Strategic Policy 1.1 (1) (Delivering National Park purposes). Paragraph 1	Comment/suggestion: Our survey also shows local concern for employment opportunities; we suggest that the Statutory Duty (“To seek to foster the economic and social wellbeing of the local communities within the National Park” is added to this paragraph.	No change.	It is desirable that the Statutory Duty to foster the economic and social wellbeing of the local communities within the National Park is added to Para 1 in order to give this greater weight.
Strategic Policy 1.1 (1) (Delivering National Park purposes).	Comment/suggestion: The importance of this policy and its legal basis (Environment Act 1995) makes it desirable that this policy should include an explicit statement that where there is conflict with other policies, this policy has greater weight – in particular in relation to the presumption in favour of sustainable development (Strategic Policy 1.3). This is again supported by our local survey. This approach would be in line with but not the same as the Sandford principle (Text 1.1.2, p. 14), which says that the first purpose has greater weight	No useful change.	It is desirable that a sentence is added to this Policy or to Policy 1.3 to make it explicit that delivering the National Park purposes must be given greater weight than any presumption in favour of sustainable development.

	than the second purpose.		
Strategic Policy 1.3 (2) (Presumption in favour of sustainable development)			This policy is unsound as it stands, as it fails to recognise that adoption of the general presumption in favour of sustainable development is likely to create conflicts with the reasons for setting up the National Park and the DNPA's Statutory Duties. It is important that this is recognised and that either Policy 1.1 or Policy 1.3 should say that the Statutory Duties should have greater weight than the general presumption.
Strategic Policy 1.5 (1) (Major Development in DNP)	Support: we strongly support this clear statement that there should be strong presumption against major development.	The strong presumption against major development remains; however the definition of what constitutes major development has changed.	We support the first part of the redefinition of Major Development in the box on p.23; however we think it is desirable that this is added to the standard definition in the second sentence rather than simply replacing it as proposed. We are concerned that the simple replacement risks allowing developers too much scope for argument and appeal.
Strategic Policy 1.6 (1) (Delivering good)	Support: we strongly support the general intention of this policy.	Unchanged.	

<p>design)</p> <p>Strategic Policy 1.6 (1) (Delivering good design) Paragraph 4</p>	<p>Comment: The use of traditional local materials is often prevented by over-rigid barriers against their continuing small-scale extraction. The result is that they are “replaced” by imported materials, often from considerable distance (e.g. Indian and Brazilian granite, Chinese slate) This is undesirable because of the added carbon emissions involved and the waste of fossil fuels (contra Policy 1.7), and also because it reduces local employment opportunities (contra the NP’s Statutory Duty). The imported materials also often look wrong next to local materials – Indian granite doesn’t look remotely like cut or split Dartmoor granite</p>	<p>Unchanged.</p>	<p>The policy is fine; the problem, however, is that DNPA frequently blocks the extraction of local materials through the planning process while doing nothing to encourage and support the extraction of local materials to ensure that there is a supply and that the relevant skills are maintained. The result is that inappropriate materials are used, skills are not maintained, and fossil fuels are wasted.</p>
<p>Strategic Policy 1.6 (1) (Delivering good design) supporting Text 1.6.7</p>	<p>Objection: We suggest that “corrugated metal sheeting” should be removed from the list of traditional local building materials set out in Text 1.6.7. Corrugated iron was not made locally, and its use is relatively recent; it came into use because it was cheaper and lighter than traditional materials. It would be wrong to object to like for like replacement where it is in use; however it is wrong to prevent its replacement by traditional</p>	<p>Unchanged.</p>	<p>Corrugated metal sheeting should be removed from the list of traditional local materials for the reasons stated. We find it hard to understand why DNPA continues to regard corrugated iron as a traditional material – it is a recent cheap replacement. DNPA’s position on this has little support, is widely derided, and encourages the use of more modern plastic-</p>

	materials on buildings previously thatched or slated. (Modern profile metal sheeting should not be regarded as an acceptable replacement for corrugated metal sheeting.)		coated metal sheeting materials which look even worse
Policy 1.7 (Sustainable construction)	Object: We strongly support the purpose of this policy, but ask that it is reworded so that reduction of energy consumption and reduction of fossil fuel use are the primary aims; they are better aims, with less risk of undesirable consequences, than identifying reduction of carbon emissions as the only aim.	Policy now more detailed, but still centred on carbon emissions. [NB Policy numbering doesn't match text. Sustainable construction is discussed in Text Sections 1.6.9-12; Section 1.7 discusses Amenity:]	The Policy should be reworded to stress reduction of energy use and fossil fuel use rather than reduction of carbon emissions, for the reasons given.
Strategic Policy 2.1 (Protecting the character of Dartmoor's Landscape)	Support: We strongly support this; it is clearly supported by the results of our local survey.	Policy slightly reworded but essentially unchanged.	
Strategic Policy 3.1 (Meeting housing need in Dartmoor National Park) Paragraph 1	Object: We recognise the importance of responding to local need, but object strongly to the indicative target of 65 new homes each year, and ask that this Paragraph be deleted. The population projections cited as evidence (p. 54) have a poor track record, mainly because the models on which they are based make highly questionable assumptions about the stability of many of the factors involved. In practice, outcomes vary much more	No useful change: the same target is retained; the same evidence is relied on.	The indicative target should be abandoned for the reasons already given. It is clear from our survey that the community opposes and rejects this policy, partly because of concern about the impact of over-rapid and large-scale development on the feel and appearance of the town, and on the community, partly because of the additional stress that it would

	<p>widely than such models allow, because we live in a changing world. The argued benefit of the indicative target of 65 homes a year would, even on the basis of this model, have only a marginal impact on the number of inhabitants aged between 25 and 65; in reality this number is much more likely to be strongly affected by available employment and by local wage rates. Young adults have left Dartmoor for a long time, drawn by educational and training opportunities elsewhere, and better employment prospects; some return to their roots in middle age, bringing back their savings and experience, and are joined by other incomers. We think it highly unlikely that adding 65 new homes a year will have any significant impact on this reality; this target serves no useful purpose, and would create an undesirable pressure for too rapid a rate of development.</p>		<p>impose on traffic and parking infrastructure which are already over-stretched, and partly because the community does not believe in the argued benefits – in particular, that it would provide any substantial improvement in the availability of genuinely affordable housing.</p>
<p>Strategic Policy 3.1 (1) (Meeting housing need) Paragraphs 2-5</p>	<p>Support: We support the underlying intentions in these paragraphs.</p>	<p>Policy slightly reworded but essentially unchanged.</p>	
<p>Strategic Policy 3.1 (1) (Meeting housing need)</p>	<p>Comment: We have, however, some concern, clearly reflected in the results of our local survey, at the current approach</p>	<p>No useful change.</p>	<p>Comment still stands; Policy still needs revision.</p>

<p>Paragraphs 2-5</p>	<p>to housing need and affordability (see also comments on Strategic Policy 3.3 below). Housing Needs Assessments are a poor measure partly because whether people put their names on a list or not is very haphazard, and partly because they produce a number of people assessed as being in need at a particular point in time, and not an estimate of the need of homes per year, which is the number that is really needed for planning purposes.</p>		
<p>Strategic Policy 3.2 (Size and accessibility of new housing)</p>	<p>Support: We fully support the underlying intention of this policy.</p>		
<p>Strategic Policy 3.2 (Size and accessibility of new housing) Paragraph 4</p>	<p>Comment and suggestion: Section 4 seems unnecessary, however well-intentioned. Where need for wheelchair access is clear at the time of building, it will naturally be provided for and doesn't need to be required; otherwise it is unlikely to be clear in advance, and has to be retrofitted. What is desirable is to encourage pre-adaptation in new-build houses when this can be done without significant added cost (e.g. doors and doorways wide enough for wheelchairs), and encouraging rather than discouraging the construction of some bungalows.</p>	<p>No useful change.</p>	

<p>Policy 3.3 (Housing in Local Centres)</p>	<p>Comment: The current definition of “affordability” lacks any realism, as the affordability ratio data on p. 54 clearly suggest, and this is also clearly evidenced by the recent lack of take-up by the intended buyers when affordable houses have been marketed. Recent past experience is that the actual delivery of affordable homes, even as questionably defined above, is in reality much lower than the %age required – developers are adept at reducing outcome. All too often the result is that a development justified and agreed to on the basis that it meets or helps to meet local need, ends up doing little to meet local need while at the same time increasing pressure on infrastructure. We offer no solution – we doubt that there is an easy solution; but we believe that it is right to be sceptical about the reality of many argued benefits.</p>	<p>The policy is unchanged. The discussion has been expanded, but probably doesn’t go far enough to make much difference.</p>	<p>See comment above on Policy 3.1. Given the present ratio between local wage levels and local house process; we feel that the only solution at present is to do more to increase the supply of social rented housing.</p>
<p>Policy 3.3 (Housing in Local Centres) Paragraphs 2, 3 and 4</p>	<p>Object: We object strongly to the proposed reduction of the affordability requirement from 50% to 45%. We feel that this will send entirely the wrong signal, encouraging developers even more than at present to reduce or avoid providing the affordable housing that is needed. Landowners and developers are reluctant to release land at the moment as</p>	<p>No change.</p>	<p>See comments above.</p>

	they hope for and expect even more windfall profit from development in future; it needs to be made clear to them that planning permission will only be given if developments respond properly to local need; and that if they hang onto land, they risk not getting planning permission at all in future. (The same comment applies to Strategic Policy 3.4; however this is not directly relevant to this community.)		
Policy 3.6 (Custom and self-build housing)	Comment: We support this policy, which has clear local support, and ask that DNPA try harder to find ways of giving greater encouragement to those who are thinking of doing this.	No change.	It is a pity that DNPA finds it easier to prevent than to encourage.
Policy 3.12 (Low Impact Residential Development)	Comment: We support this in principle; however we are concerned that key terms (especially “low impact” and “ecological footprint”) are so undefined as to make it hard for a potential applicant to know what is expected, and hard also for this policy to be applied consistently without causing applicants to incur disproportionate cost in seeking to demonstrate likely future compliance. As it stands, this policy does more to discourage applicants than to help or encourage them as we feel it should.	No change.	It is a pity that DNPA finds it easier to prevent than to encourage.

<p>Policy 4.3 (Parking standards)</p>	<p>Object: In view of the underlying factors set out in 4.3.3 – 4.3.6, the present high dependence on cars in Moreton, reflecting shortage of public transport and limited employment within the town, and the concern of Moreton residents as shown by the recent local survey, we think that the residential parking standards referred to in policy 4.3.1 and set out in Table 4.2 are inadequate, especially when garages are included in parking provision counts, since garages are often used for other purposes. We ask that the standards be significantly increased, and further that it should be explicitly required that the surfacing used should not be impermeable unless there is good reason that it should be.</p>	<p>No change, apart from adding requirement to incorporate sustainable drainage.</p>	<p>Change welcomed: many thanks.</p>
<p>Policy 4.5 (Public car parks)</p>	<p>Comment: we suggest requiring that surfacing of new car parks should not be impermeable unless there is good reason that it should be.</p>	<p>Changed to add requirement to incorporate sustainable drainage.</p>	<p>Change welcomed: many thanks.</p>
<p>Strategic policy 5.1 (Business and Tourism Development) Paragraph 5.1.4, and Strategic Policy 5.3</p>	<p>Comment: Since 1950, the number of shops in Moretonhampstead has fallen from around 50 to around 15; at the moment we have a number of derelict unused shops and charity shops. This largely reflects general trends; however there are some actions that could be taken</p>	<p>No useful change.</p>	<p>Comments stand, though we appreciate that DNPA has limited scope to help to make changes.</p>

<p>(Shops and other active uses) Paragraph 5.3.2</p>	<p>to improve things. The viability of local businesses is adversely affected by high business rates, by regulations that are appropriate for large enterprises but disproportionate for small ones, and by shortage of parking and parking charges. While DNPA isn't responsible for parking and for business rates, they could probably help by talking to the responsible authorities. When local shops really aren't viable, permission for change to residential use should be granted more readily than appears to be the norm at the moment, whether or not the shop is in the Town Centre (which is not defined).</p>		
<p>Strategic Policy 5.3 (Shops and other active uses) Paragraphs 5.3.2 and 3</p>	<p>Object: The marketing period of 6 months set in Paragraph 5.3.2 seems over-short in relation to how the local market works. We ask that this period be extended to 12 months. We also ask that Paragraph 3 be amended so that once the 12-month marketing period has passed, it should then be possible to move more speedily.</p>	<p>No change.</p>	
<p>Proposals 7.10 (Land at Betton Way) and 7.11 (Land at Forder</p>	<p>Comment: we welcome the emphasis on meeting identified local need, which is clearly supported by our recent local survey, but, as stated in our comments on</p>	<p>Housing numbers have been added (around 18 homes for the Betton Way site, and around 25 homes for the Forder Farm site). These would</p>	<p>The housing numbers should be removed or substantially reduced, and there should be a clear requirement to provide more</p>

Farm).	<p>Policy 3.3, we question the methodology by which this need is assessed, and view the 45% affordability (defined as 75-80% of market price) target as unambitious, especially in view of DNPA's past record of delivery of affordable houses in Moretonhampstead. We would ask that you add a requirement for a high proportion of smaller homes, for first-time buyers and for down-sizers, and insist more effectively on delivery.</p> <p>We would also comment that it is important that the density of proposed development reflects and respects the general density of housing on the edge of the town; over-crowded developments should not be acceptable.</p>	<p>result in higher densities of buildings than is appropriate for the margin of the settlement, and we are concerned also at the likely visual impact of large developments of similar houses. These developments would also be likely to add significantly to traffic and parking problems in the town, and, the 45% requirement for "affordable" housing would do little to provide more genuinely affordable housing.</p>	<p>genuinely affordable housing – probably rented social housing. Our survey shows clearly that our community only supports development that significantly improves the availability of genuinely affordable housing and doesn't add to current infrastructure problems – in particular traffic and parking. The community is likely to reject and oppose these proposals as they would have significant detrimental impact on the appearance and feel of the town and on traffic and parking, while doing very little to provide more genuinely affordable housing. (Please see also comments on Policy 3.1.)</p>
Proposal 7.12 (Land at Thompson's).	<p>Object: We recognise that this is a brownfield site, and that, as a result, there is no legal requirement to provide affordable housing because of the large size of the warehouses that would be demolished, and recognise also that the site as it isn't an asset to the town. We welcome Paragraphs 2a, c, and d. However we feel that the proposal as it stands will be seen as an open invitation</p>	<p>Housing number (around 26 homes) has been added; also a 45% affordability requirement. See comments above on Proposals 7.11-12. There is still no statement that development should only be come forward if responsive to local needs. We should also be aware that this would have no effect until 2021.</p>	<p>The housing number should be removed or substantially reduced, and there should be a clear requirement to provide more genuinely affordable housing – probably rented social housing. (Please comments above on Proposals 7.10-11, and also comments on Policy 3.1.) A requirement should be added, as</p>

	<p>to proposals to try to cram as many up-market homes onto the site as possible to maximise profit with little local benefit. We would ask that you add a statement that development should only be approved if it responds to local need (in line with general policy and with Proposals 7.10 and 7.11), and would also ask that you add a requirement for a density of housing that reflects the general density of housing on the edge of the town.</p>	<p>There is also no explanation why Section 3.1.13, on Vacant Building Credit doesn't apply to this site. Challenge would probably have more chance of success as a result.</p>	<p>in Proposals 7.10-11, that development should only come forward if responsive to local needs; and some explanation needs to be added about why Vacant Building Credit should not apply, to reduce the probability of challenge.</p>
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