

**Okehampton Town Council
Planning Meeting 2nd October 2023
Meeting Report**

Date:	25 th September 2023
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Okehampton Town Council

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DRAFT Developer Engagement Policy (Planning)

1. Policy Statement

This policy sets out how Okehampton Town Council will engage with developers and/or their agents, both prior to, and following, the submission of a planning application within the town, and informs Councillors and Officers when arranging discussions with developers.

2. Policy Scope

The policy applies to all Councillors and Employees.

This policy also applies to all stages of the planning development cycle including speculative queries and during the consultation phase.

Okehampton Town Council will not offer advice on Planning Policy or provide a formal view at such presentations.

3. Pre-Planning Application Developer Meeting Guidelines

Individual Councillors may be approached by developers for informal discussion. This must be approached with caution and, in all instances, notified to the Clerk. Councillors must make it clear they are not representing Okehampton Town Council at any time except in the appropriate meeting, unless expressly authorised to do so.

The Town Council recognises that pre-application discussions play an important role in major planning applications and welcomes the desire of developers to consult both with Okehampton Town Council and the wider community. Okehampton Town Council is also aware of the importance of public perception in planning and the need to avoid any appearance that Okehampton Town Council is conducting secretive negotiations or is colluding with developers. It is important therefore that such pre-application discussions are undertaken appropriately and transparently.

Okehampton Town Council, where possible, accommodates requests from developers to present their pre-application proposals at a meeting of the Planning Committee prior to public consultation on the following conditions:

- 3.1 Pre-application planning discussions, communications and any comment given by the Planning Committee will not bind the Planning Committee to making a particular decision. Any views expressed will be without prejudice and based on the information available at the time.
- 3.2 Pre-application planning discussions will be held within a meeting of the Planning Committee which is open to the public. A record of meetings with developers/agents held on site at their request and with the permission of the landowner, will be made and reported to the next meeting of the Planning Committee.
- 3.3 On request of a pre-application meeting, developers will be sent a copy of this policy and asked to acknowledge receipt and their understanding of its content.

4. Post submission of a Planning Application

Following the submission of an application, any discussions with developers/agents will be held during a Planning Committee Meeting that is open to the public.

5. Construction Phase

There are many issues that can arise during the construction phase, from amendments to plans, disputes with neighbours and highways issues. A Councillor may, on the instruction of Council or the Planning Committee, act as a representative to feedback on such issues.

6. Advertising of meetings with developers

Okehampton Town Council will use the publication of Agendas to notify residents of meetings in the normal way. The agenda will include the publication of the developer/ agent's name and proposal.

Parking Issues – Giblands Estate

Dear

Highways matters are the responsibility of Devon Highways, a link to their website <https://www.devon.gov.uk/roadsandtransport/parking/> in case this is of interest to you. You could also contact Cllr Lois Samuel who is the Okehampton DCC Councillor, her details can be found here <https://democracy.devon.gov.uk/mgUserInfo.aspx?UID=5729>

I will ensure however that the Town Council's Planning Committee is made aware of your concerns and they may decide to contact DCC and also raise this as an issue. Their next full meeting is on 2nd October.

Kind regards

Emma James, PSLCC
Town Clerk & RFO
Okehampton Town Council Mobile Web site enquiry

There is very inconsiderate parking up in the giblands estate of okehampton, when you are first coming to turn in to giblands on the left hand side there is always a line of cars which makes it really hard to see around the corner and drive in, i have been in several near crashes, I know this parking isn't illegal but is very inconsiderate to both other drives and pedestrians. When asking on Facebook for people to kindly use the car parks instead of dangerous on this piece road they said they will not stop doing it until the council intervenes, please can we extend the double yellow lines or increase the capacity to the car parks to amend this issue, or perhaps point me in the right direction to ask someone who will do something about this issue as I know it is not only affecting me but many others. [REDACTED]



NPA/23/015

Dartmoor National Park Authority

1 September 2023

Government consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets and open prisons; and a call for evidence on nature-based solutions, farm efficiency projects and diversification

Report of the Acting Head of Forward Planning and Economy

Recommendations: **That Members:**

- (i) **Note and accept the contents of this report; and**
- (ii) **delegate authority to the Chief Executive (National Park Officer), in consultation with the Chair, to agree the final consultation response.**

1 Summary

- 1.1 On 24 July 2023 the Department for Levelling Up, Housing and Communities (DLUHC) consulted on proposed changes to permitted development rights (PDRs) to allow additional flexibilities to support housing delivery.
- 1.2 The proposals include new and extended PDRs to allow for the conversion of a variety of non-residential uses to housing and asks whether these PDRs should be extended to National Parks in England. The consultation on the proposed changes is clearly important to the Dartmoor National Park and the work of the Authority. We are also liaising with the other English National Park Authorities on a joint response to the consultation.
- 1.3 These proposed changes, if implemented, could have a significant detrimental impact on the landscape and character of the National Park and do little to alleviate the need for affordable housing. The proposed changes could also significantly limit the effectiveness of the Local Plan and its ability to positively manage development for the benefit of the protected landscape and its communities.

2 Summary of Consultation

2.1 In summary the consultation proposes the following changes:

Commercial, business and service use (Class E) to dwellinghouses: came into effect in August 2021 and affects a range of high street uses such as shops, restaurants, offices, gyms and light industrial uses. It does not extend to National Parks, and is permitted subject to local assessment of noise impact, floor space limits, flood risk, and a 3 month vacancy period. Proposed changes include:

- Broadening to apply to article 2(3) land, including National Parks
- Currently up to 1,500m² can change use to up to 20 2-bed homes. The consultation proposes to increase this to 3,000m² or for there to be no limit
- Removing the existing requirement for a 3 month vacancy period

Hotels, boarding houses and guest houses (Class C1) to dwellinghouses: a new PDR, it is proposed the prior approval regime will allow for local consideration of the impact proposals would have on the local tourism economy and views on a floorspace limit are requested.

Commercial, business and service (Class E), betting office or pay day loan shop (Class M) to mixed use residential: an existing right which allows for change of use to mixed use with up to two flats. Proposed changes include:

- Broadening to apply to article 2(3) land, including National Parks
- Broadening to include other use classes, while retaining the ground floor business use
- Allowing for up to four dwellings and requiring they meet space standards

Agricultural buildings to dwellinghouses: an existing right, with limitations and conditions including the type of agricultural buildings that can benefit, the size and maximum number of dwellings delivered, and the extent of works. The right allows a maximum of 865m² to change use, delivering four small homes of 100m² and one larger home of up to 465m². The right does not currently apply to National Parks. The consultation proposes:

- Broadening the PDR to apply to other article 2(3) land, including National Parks
- Increasing the total amount of floorspace that can change use to 1,000m²
- Introducing a maximum floorspace limit of either 100m² or 150m², compliant with nationally described space standards
- Increasing the number of homes that can be delivered on an agricultural unit from 5 to 10
- Allowing the PDR to apply to buildings not on an agricultural unit
- Requiring eligible buildings to have suitable public highway access

Other rural buildings to dwellinghouses: the consultation asks what other rural buildings may be suitable for residential conversion, including equestrian and forestry buildings.

Agricultural Buildings to flexible commercial uses: an existing right, allows change of use of agricultural buildings to flexible commercial uses, including storage

and distribution (Class B8), hotels (Class C1), commercial and business services (Class E). The consultation proposes:

- Allowing other rural buildings to benefit from the right, including equestrian and forestry buildings
- Increasing the permissible flexible uses by including outdoor sports and recreation or fitness uses and general industrial (Class B2)
- Allowing for mixed uses
- Increasing the amount of floorspace that can change use from 500m² to 1,000m²

Agricultural development: an existing PDR which allows agricultural units of 5Ha or more to erect or extend agricultural buildings, and excavation and engineering works. Separately another right applies to units of less than 5Ha for the extension, but not erection, of buildings amongst other works. The consultation proposes:

- On units of 5Ha or more, increasing the amount of ground area covered by any buildings on units of 5Ha or larger from 1,000m² to 1,500m², it was previously uplifted from 465m² in 2018.
- On units of 5Ha or less, increasing the amount of ground area covered by any extension from 1,000m² to 1,250m²

Other proposals relevant to Dartmoor National Park: include increasing the time temporary markets can operate without the need for planning permissions and a call for evidence from Defra possible changes to permitted development rights to greater flexibility in making existing agricultural buildings more productive, supporting diversification and nature-based solutions.

3 Dartmoor's need for new homes and the Dartmoor Local Plan

- 3.1 The consultation proposes a raft of new routes for unrestricted open market homes to be delivered speculatively in the National Park, without the need for planning consent or ability for Local Plan policy to be applied. These proposals pose significant and material threats to the success of the Dartmoor Local Plan housing strategy and the achievement of National Park purposes in the long term. It is difficult to see how these proposed changes can be equated to the legal duty on the Government to have regard to National Park purposes. The proposals are also contrary to the recommendations of the Government commissioned independent review of National Parks and Areas of Outstanding Natural Beauty which concluded: *'We think [National Park Authority] planning powers are important, the protections they give are essential and we don't think they hold progress back'*.
- 3.2 With regard to national permitted development rights, the National Landscapes Review concluded, 'The current Permitted Development Rights (PDR) system should also be reviewed and, if necessary, further PDRs should be added to the list of those currently withdrawn within national landscapes to ensure that the full application process applies before determining planning approval.' These proposals run completely contrary to this conclusion of the Government-commissioned review.
- 3.3 The Government's response to the National Landscape Review was published in January 2022. In this, the Government confirmed that a strong and effective

planning system must sustainably balance protections with supporting local communities and economies. 'This balancing exercise must be carried out differently in protected landscapes, to ensure their statutory purposes and special qualities are meaningfully protected. This involves giving greater weight to their special qualities in planning policies, procedures, and decisions...we recognise the special role that protected landscapes hold within the planning system.' This is correct, but the proposed PDRs that would allow hotels, guest houses, agricultural buildings and shops to be converted to unrestricted housing in National Parks are diametrically opposed to this position.

- 3.4 The Dartmoor Local Plan provides a development framework that avoids speculative open market housing development in Dartmoor National Park on the basis this risks impact on special qualities and will not assist the National Park's communities address strategic socio-economic issues. The Local Plan therefore generally only permits housing development where it is supporting delivery of affordable and other identified local housing needs.
- 3.5 The two statutory purposes for National Parks, laid out in the Environment Act 1995, together with the duty of the National Park Authority to support communities' socio-economic well-being frame how the growth of housing within our National Parks should be prioritised.
- 3.6 The 2010 National Parks Circular provides additional government guidance and policy with regards housing growth and development in our National Parks. It states that:

"78. The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.

79. The Government expects the Authorities to maintain a focus on affordable housing and to work with local authorities and other agencies to ensure that the needs of local communities in the Parks are met and that affordable housing remains so in the longer term."

- 3.7 Paragraph 172 of the National Planning Policy Framework (NPPF 2021) gives the highest status of protection in relation to the conserving and enhancing landscape and scenic beauty in National Parks.
- 3.8 The Dartmoor Local Plan 2018 - 2036 used this policy framework to shape a sustainable strategy for the growth of housing over the plan period. Evidence supporting the Local Plan identified the following principal issues:
 - Limited land availability due to high environmental constraints
 - High housing unaffordability making it difficult for local people and workers to live locally
 - A reduction in the working age population, making it increasingly difficult for local businesses to recruit and retain staff, and reducing the sustainability of communities and local services

- Continued or increasing under-occupancy of homes by older people or individuals, which runs at odds with the aim of making the best use of the housing stock
- A greater demand for services and facilities to meet the needs of older people, some of which may be difficult to deliver in deeply rural areas (for example home care)
- A decreasing demand for services and facilities for younger people, including schools, making them increasingly difficult to sustain in smaller communities

The Local Plan responded to these issues with a holistic housing strategy and policies which:

- set a housing growth level of 65 homes each year based on what evidence suggests is necessary to reduce demographic trends, provide sufficient housing to meet local housing needs, and for which there is land available. This indicative supply figure has and continues to be met;
- provide appropriate and flexible opportunities for housing development which meet communities' housing needs in a range of sustainable settlements;
- avoid development in unsustainable locations or where it may have an unacceptable impact on National Park Special Qualities;
- ensure a mix of house sizes and types are available to meet communities' housing needs, including those in affordable housing need, needs of first-time buyers, self-builders, elderly downsizers, growing families and small households;
- provide suitable homes for older people and downsizers, by requiring they all meet adaptable homes standard M4(2);
- enable local families and those working locally to live on Dartmoor; and
- support provision of accommodation for farming, forestry and other rural land-based enterprises.

4 Meeting local housing needs

4.1 Evidence suggests that new open market homes delivered via the routes proposed within this consultation, particularly conversion of agricultural and other rural buildings, will not support Dartmoor communities or address the strategic housing issues identified and addressed by the Local Plan. In particular such homes:

- are likely to attract a significant premium and be unaffordable to local persons because:
 - their large allowable size
 - their location in desirable isolated locations in a protected landscape
 - their unrestricted open market nature and suitability for the short-term let and second home market
 - our experience is that open countryside conversions of 93m² discounted by 30% from open market value are often unaffordable to local persons in need, particularly those working in tourism and agriculture who have greater need to be rurally-based and whose jobs are often directly related to the maintenance of the National Park
- are less likely to contribute to the sustainability of Dartmoor's communities and viability of local services and facilities because of their isolated location

- cannot guarantee they will meet the needs of older persons and downsizers. In particular they are unlikely to be located close to services and facilities, or meet adaptability standard M4(2)
- will not contribute to sustainable development and will unnecessarily increase residents' travel needs, simultaneously increasing the climate impacts of new homes

5 Conversion of historic agricultural buildings

- 5.1 DNPA take a positive approach to supporting the sustainable reuse of historic rural buildings via the planning system. This approach will be mostly undermined by the proposed permitted development rights and will severely limit the effectiveness of Local Plan policy to conserve and enhance features of the National Park that are material to its designated National Park status.
- 5.2 The National Park has a substantial number of historic farm buildings many of which are of historic value and contribute to Dartmoor's aesthetic quality and cultural value. Our Historic Farmsteads Survey identified 1100 surviving pre-1919 historic farmstead and over 200 lost farmsteads, many of which are not listed. Our [Historic Farmstead Character Statement](#) details the range and type of farm buildings on Dartmoor.
- 5.3 Traditional farm buildings tell a story of Dartmoor's long farming history and the settlement of Dartmoor's landscape. Their construction often reflects underlying geology and traditional building practices and they therefore contribute to a sense of place, local distinctiveness and landscape character. Traditional agricultural buildings are inherently valuable and worthy of conservation in their own right.
- 5.4 The location of these buildings in isolated rural settings can make them particularly desirable for residential conversion. The significant costs associated with the restoration and preservation of these buildings also means that residential use is often the most economically viable alternative use, but rarely the most sustainable or suitable in socio-economic or conservation terms.
- 5.5 Agricultural buildings generally have a modest setting with few features or embellishments and residential conversions can put a significant amount of pressure on the building's setting to accept domestic gardens, patios, furniture and other paraphernalia which all serve to divorce the building from its modest beginnings. The result is the conversion disturbs the relationship the building has with the surrounding landscape and its value to the National Park is lost irreparably.
- 5.6 Local Plan Strategic Policy 2.7 plans for the sustainable reuse of these buildings whilst ensuring that broader housing objectives are also met. The policy:
- Focusses on finding the optimum viable use, starting with low and medium impact uses. Recognising redundant agricultural buildings provide an important supply of affordable employment space to support Dartmoor's economy
 - Where not feasible, higher impact uses such as holiday let or residential can be considered in appropriate locations providing:
 - new residential uses are considered for affordable discount market sale
 - if not appropriate a financial contribution in lieu is sought and occupancy restricted to local persons

- This approach ensures new housing contribute to meeting local needs, or raises s106 funds to support affordable housing delivery elsewhere

6 Conversion of modern agricultural and other rural buildings

- 6.1 Beyond PDRs which allow commercial change of use, Local Plan policy does not support the conversion of modern redundant agricultural buildings or those of no historic or architectural significance because:
- these buildings are likely to be suitable for continued agricultural use, on an alternative holding if not the current
 - the preservation and conservation of these buildings is not a priority as they are of no intrinsic historic or architectural importance, they do not positively contribute to the architectural legacy of the National Park
 - on this basis most modern agricultural buildings were permitted with redundancy conditions requiring them to be dismantled upon them becoming redundant for agricultural purposes
 - many of these buildings are isolated and their conversion would have a significant cumulative adverse impact on landscape character, tranquillity and transport infrastructure
- 6.2 This approach extends to other types of rural buildings which this consultation scopes for residential conversion, including forestry and equestrian buildings. These buildings are permitted because they are needed to support industries that play a part in conserving and enhancing Dartmoor consistent with National Park purposes. Outside of this purpose the location and design of these buildings does not achieve conservation and enhancement and are not appropriate for change of use or to accept more intensive residential uses which would further their adverse impact.

7 Protection of main town centre uses

- 7.1 The proposed PDR allow for residential conversion of Class E (shops, offices, cafes, restaurants, GPs, light industrial, creches, gyms and more) uses. The consultation also proposes to remove the need for any vacancy period before change of use.
- 7.2 These changes will likely result in the loss of the above employment floorspace in an uncontrolled manner, and will undermine the Local Plan strategy for providing flexibility and support to these employment uses and town centres throughout the National Park. In particular we would highlight:
- Dartmoor's successful town centres comprise numerous independent retailers reflecting their traditional retailing role. They are inherently more resilient to the broader trends of failing high streets these proposals seek to address
 - The potential for town centre development is generally constrained, with all centres containing significant listed buildings and a tightly packed street-scene. Therefore, loss of employment space at the scale proposed will likely not be recoverable through alternative development opportunities.
 - There is a risk that loss of employment space will act as a driver of economic decline, reducing accommodation options for businesses and increasing the

likelihood of businesses moving out of the National Park. In turn reinforcing out-commuting as a significant feature of the Dartmoor economy

- Widespread residential conversion in Dartmoor's quaint and characterful centres will likely also undermine the attraction of these centres from a tourism perspective. Instead of supporting the features which make them resilient, it will likely actively support their decline
- The effects of these proposals are likely to be particularly acutely felt in Dartmoor's most successful town centres where residential values outcompete commercial values, such as Chagford, Ashburton and Moretonhampstead

- 7.3 The Dartmoor Local Plan has a vital role to play in ensuring Dartmoor's Town Centres remain vibrant and active town centre uses are not lost in favour of higher value residential uses.
- 7.4 Local Plan Strategic Policy 5.3 protects main town centre uses in Dartmoor's Town Centres, understanding that these uses' futures are important to the success of Dartmoor's economy. They should not be decided simply on the short term needs of an owner or tenant, or their current business model. The case must demonstrate a main town centre use is not workable in the long term by exploring the full range of potential uses or ways to operate it.
- 7.5 This policy also seeks to protect the last shop, general store or pub in any of Dartmoor's classified settlements. Helping ensure these important public services remain available for communities.
- 7.6 The current consultation proposals would undermine these approaches irreparably.

8 Conclusion

- 8.1 For the reasons outlined above Officers would like Members support in responding to the consultation proposals discussed.
- 8.2 Delegated authority is sought for the Chief Executive (NPO) in consultation with the Chair to agree the final consultation response.

ALEX GANDY