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Catalyst

YELVERTON BUSINESS PARK STUDY

JULY 2015

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INTRODUCTION

Yelverton Business Park is located on the edge of Crapstone village, within Buckland Monachorum parish, West Devon Borough, Tamar Valley Area of Outstanding Natural Beauty (AONB) and borders Dartmoor National Park.

Within West Devon Borough Council's draft local plan (Our Plan¹) a policy was included to allow for the expansion of the business park in to a neighbouring field.² Figure 1 shows the location of the site.³

This land has been subject to planning applications for a similar development, most recently in 2010.⁴ At that time the application was turned down.

In the light of responses to West Devon Borough Council's local plan consultation from concerned local residents, Buckland Monachorum Parish Council under the guidance of their Neighbourhood Plan Steering Group requested an independent consultant undertake a review of this policy proposal.

CATALYST

Catalyst is the in-house consultancy service provided by Devon Communities Together.⁵ Catalyst was commissioned to consider the

¹ Our Plan, February 2015 - <http://www.westdevon.gov.uk/CHttpHandler.ashx?id=12825&p=0>

² Our Plan, February 2015, OP19

³ Our Plan, February 2015, p.125

⁴ West Devon Borough Council planning application number 00396/2010/Tav -

<http://apps.westdevon.gov.uk/planningsearch/default.aspx?shortid=00396/2010>

⁵ <http://www.devoncommunities.org.uk/>

proposed site allocation in line with Terms of Reference from the Neighbourhood Plan steering group. Catalyst had previously undertaken a community survey on behalf of the Neighbourhood Plan steering group.



Figure 1

TERMS OF REFERENCE

At the outset of this project, Buckland Monachorum Neighbourhood Plan Steering Group outlined their terms of reference to focus on particular areas. The key questions were:

1. The validity of any proposed expansion with reference to current local and national planning guidelines.
2. Whether, when last refused, there have been any material changes in circumstances or planning requirements which change the balance of the argument for or against further development.
3. Whether there is quantifiable demand for expansion.
4. The prospect for generating local employment were further development approved based on the nature of employment in the current units.
5. If further development were approved, whether any particular restrictions on the type of development (structural or use) would be appropriate.
6. The validity of matters raised in letters of objection by local residents (in planning terms) together with evidence from WDBC justifying their proposal.
7. An assessment of the environmental and visual impact of any further development.

SUMMARY FINDINGS

In line with these terms of reference, the findings of this report are as follows:

1. With reference to National Planning Policy Framework (NPPF) for development within an AONB, there seems to be insufficient

evidence to support the scale of development proposed with OP19.

2. Since the last planning application was refused there has been significant change to planning policy, in particular the development of the NPPF. These changes encourage development to support economic growth in rural areas, as well as conserving landscape and scenic beauty within protected landscapes. Balancing these two demands is the challenge for development on the proposed site.
3. From consultation with businesses already located on the business park there is a quantifiable demand for expansion. However this study fails to establish whether this need necessarily requires expansion within the locality of the current business park or could be accommodated on another site locally, outside the protected landscape, if it were available.
4. Expansion of the business park does increase the potential for local employment and potential support for local businesses (for example local shops in Crapstone and Yelverton). No restrictions could be introduced to limit occupancy to a defined locality however.
5. Guidance as to the design and use of any new development could be introduced through the local plan or neighbourhood plan and would be essential.
6. The two most common concerns raised through the letters of objection were:
 - a. **Increased traffic, with associated noise and air pollution.** Traffic is likely to increase with any new development. For the policy to be viable evidence to show

how any harm to the special qualities of the AONB will be mitigated is required.

- b. **The site's location within an AONB and the protection this affords.** This is an important consideration, omitted in the wording of OP19 but of high importance considering the wording of the NPPF. The implications of which seem to be broadly overlooked within the current policy.

Therefore the concerns raised are valid and need to be addressed by West Devon Borough Council within Our Plan.

- 7. Any development on the site will be subject to assessment of the environmental and visual impact, and the impact mitigated. Clauses e and f of policy OP19 reflect this but could be strengthened.

METHODOLOGY

Policy proposals within a local plan need to be supported by a strong evidence base. To fulfil the terms of reference some primary evidence needed to be gathered, along with reviewing evidence already in the public domain.

Primary evidence was gathered during June 2015.

PRIMARY EVIDENCE

The following primary evidence was gathered for this review:

- Consultation with existing users of Yelverton Business Park;
- Incidental traffic survey;
- Meeting with West Devon Borough Council strategic planners;
- Consultation with Tamar Valley Area of Outstanding Natural Beauty;
- Attendance at Buckland Monachorum Parish Council Planning Committee meeting to hear presentation from Unit Build about possible future development;
- Consultation with Dartmoor Livestock Protection officer;

SECONDARY EVIDENCE

A range of additional evidence was reviewed as part of this study and is referenced within the footnotes of this document with weblinks where available.

PRIMARY EVIDENCE

YELVERTON BUSINESS PARK SURVEY

A simple survey was conducted of businesses that operate from the business park. The aims of this survey were:

1. To establish the need from existing businesses for additional premises;
2. To understand what size units would be needed to satisfy any identified need;
3. Better understand the number of local people employed on the business park;
4. Greater insight in to the overall opinion of businesses on the site regarding the proposal and opinions about the current site.

RESULTS

Understanding exactly how many businesses operate from the park is not easy. Some units are used for storage, others used infrequently. At the time of visiting none appeared to be vacant. According to the sign at the front of the Business Park there are 16 businesses located on the site. During this exercise 17 businesses were spoken to. Of these 11 agreed to undertake the survey. One business did not wish to take part. Of the five others, either the appropriate person to speak to was on holiday, or a mutually convenient time could not be reached.

1. NEED FOR ADDITIONAL PREMISES

Of the 11 businesses spoken to, over the next 5 years:

- 5 were planning to stay in their current property;
- 1 was planning to stay if they could expand their current building or move in to a larger building;
- 4 would stay if new larger premises became available;
- 1 was planning to move away from the site.

In addition one other business thought they would need a larger premises, but not within the next five years.

Furthermore anecdotal evidence suggests there are businesses looking to locate to the business park, and this demand has increased in line with the overall improvement of the UK economy since the most recent recession.

63% of businesses agreed there was a need for expansion amongst existing business park users and 91% thought expansion would be good for existing businesses.

54% found the lack of room to expand their business a challenge of the current site.

2. WHAT SIZE UNITS WOULD BE REQUIRED TO SATISFY ANY IDENTIFIED NEED

All businesses wanted a mix of units, of similar size and style to the current business park. Four businesses required larger premises than they currently had, requiring units of 2000-3000 square feet.

3. LOCAL EMPLOYMENT

The 11 businesses spoken to employed 130 people full time and 33 part time. Of these approximately 17 (10%) lived locally within the parish of Buckland Monachorum or neighbouring villages.

Five of the businesses spoken to were started by local people.

Beyond those employed on the business park, a further study may wish to investigate what impact the business park has on other local businesses within Crapstone and Yelverton.

4. ADDITIONAL INSIGHTS

- 82% were very satisfied with the current site, the remaining 18% were satisfied.
- The slow internet speed available on site was the greatest challenge identified.
- Mobile phone coverage for the site is also very poor.

INCIDENTAL TRAFFIC SURVEY

A more thorough traffic survey would be needed to provide evidence for a local or neighbourhood plan, but two incidental traffic surveys were undertaken on Wednesday 24 June and 30 June from 8am to 9am.

24 June:

340 traffic movements were recorded.
63 entering the business park (19%)
15 leaving the business park (4%)
262 passing the business park (77%)

30 June:

372 traffic movements were recorded
67 entering the business park (18%)
14 leaving the business park (4%)
291 passing the business park (78%)

TAMAR VALLEY AREA OF OUTSTANDING NATURAL BEAUTY

Tamar Valley AONB have shared their response to the West Devon Borough Council's consultation with us, and is included in Appendix A.

DARTMOOR LIVESTOCK PROTECTION OFFICER

The Dartmoor Livestock Protection Officer advised that there are approximately 12 accidents a year involving livestock on the Yelverton to Crapstone road. Within the National Park this is not considered a hot-spot.

FINDINGS – WITH REGARDS TO THE TERMS OF REFERENCE

THE VALIDITY OF ANY PROPOSED EXPANSION WITH REFERENCE TO CURRENT LOCAL AND NATIONAL PLANNING GUIDELINES.

The NPPF set out the Government's planning policies for England and how these are applied.⁶ It was introduced in 2012 and sets the framework for creating a local and neighbourhood plan. It promotes three dimensions to sustainable development: economic, social and environmental.

⁶ NPPF 2012 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The NPPF outlines the Government's commitment to sustainable economic growth and planning operating as an encouragement to growth,

The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.⁷

In addition:

To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.⁸

The NPPF also make a particular point of supporting a prosperous rural economy,

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*

⁷ NPPF 2012, paragraph 19

⁸ NPPF 2012, paragraph 20

- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*⁹

Section 11 of the NPPF¹⁰ outlines considerations for conserving and enhancing the natural environment. Given the location of Yelverton Business Park within the Tamar Valley Area of Outstanding Natural Beauty and bordering Dartmoor National Park, paragraphs 115 and 116 are of particular importance.

Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

⁹ NPPF 2012, paragraph 28

¹⁰ NPPF 2012, paragraphs 109-125

Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*¹¹

The challenge therefore is whether exceptional circumstances exist to justify the allocation of a site within the AONB for expansion of the business park.

To date the evidence presented by West Devon Borough Council in support of Our Plan do not make the case for exceptional circumstances. In particular:

- How further development would contribute to environmental and social sustainability, and detrimental effects on the environment and landscape could be moderated;
- Consideration of other rural sites not located within a protected landscape and why this site was still preferable. There is no 'options appraisal' considering other sites, and why a location within a protected landscape is the preferred option;
- That the scale of the proposed development site is proportional to the need and location;
- How the development is in the public interest.

¹¹ NPPF 2012, paragraphs 115 and 116

WHETHER, WHEN LAST REFUSED, THERE HAVE BEEN ANY MATERIAL CHANGES IN CIRCUMSTANCES OR PLANNING REQUIREMENTS WHICH CHANGE THE BALANCE OF THE ARGUMENT FOR OR AGAINST FURTHER DEVELOPMENT.

The context in which local plans and planning decisions are made has changed. The most significant being the introduction of the NPPF, the implications of which are outlined in the previous section.

The most recent application was 00396/2010/TAV,¹² and was refused.¹³ The application was for an extension of the existing business park on to the site considered in OP19, although not its entirety, for B1, B2 and B8 usage.¹⁴

¹² West Devon Borough Council planning site, information relating to this application - <http://apps.westdevon.gov.uk/planningsearch/default.aspx?shortid=00396/2010>

¹³ Planning application refusal notice - <http://planningportal.westdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=189818&PageNo=1&PDF=true&nocd=true&content=obj.pdf>

¹⁴ **Class B1. Business**

Use for all or any of the following purposes—

- (a) as an office other than a use within class A2 (financial and professional services),
- (b) for research and development of products or processes, or
- (c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

Class B2. General industrial

Use for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below.

The following reasons were given for refusal:

1. On the basis of the information provided the Local Planning Authority does not consider there to be an exceptional need for a development of this scale in this location on the edge of a small village and within the AONB. Accordingly the development is contrary to policy contained within PPS7 and Local Plan Review Policies ED13, ED14 and ED16.
2. The development would have an unacceptable detrimental impact upon the character of the AONB and adjacent Dartmoor National Park contrary to PPS7, Structure Plan Policies CO1, CO2 and CO3 and Local Plan Review Policies NE7, NE8 and NE10.

The economic climate is much changed from 2010. The number of vacant sites on the current business park is much lower than in 2010.

Evidence of need for expansion from current business park users is provided within this report.¹⁵

However the need for expansion from existing businesses alone does not necessarily mean the site identified by OP19 is the right site to accommodate this need.

The second reason concerning the impact upon the Tamar Valley AONB and Dartmoor National Park still stands despite the changes in planning and the introduction of the NPPF. This does not exclude development within an AONB, but as already discussed requires evidence of exceptional circumstances, which has not been adequately provided.

Class B8. Storage or distribution

Use for storage or as a distribution centre.

¹⁵ See pp. 6&7, result of Yelverton Business Park Survey.

Within the Our Plan supporting evidence there is a document; Landscape Character Assessment for Development Impacting on the Tamar Valley AONB.¹⁶

This document specifically considers the site within policy proposal OP19. Of the criteria considered four were considered Low-Medium Impact and three Medium Impact. Overall the site was given a rating of Medium Impact (the middle value on a five-point scale). The summary reads:

Initially appears a challenging site with introduction of commercial development adjacent to Dartmoor National Park.

However opportunity to contain the site visually and access from the existing entrance allows for carefully controlled development on the site.

A design code for the site to guide plot sizes, dimensions, materials, colours, lighting and landscaping is suggested.

Strategic landscape scheme for whole site suggested.

Within the policy itself there is insufficient evidence as to how this impact will be mitigated.

WHETHER THERE IS QUANTIFIABLE DEMAND FOR EXPANSION.

¹⁶ Landscape Character Assessment for Development Impacting on the Tamar Valley,
<http://www.westdevon.gov.uk/CHttpHandler.ashx?id=12794&p=0>

The evidence from current businesses suggests there is a quantifiable demand for expansion. Five businesses spoken to were looking to expand their premises within the next five years. Anecdotal evidence suggests that there are businesses looking to locate to the business park.

However an omission from this study is whether the needed expansion could be accommodated on an alternative site or sites if they were available.

THE PROSPECT FOR GENERATING LOCAL EMPLOYMENT WERE FURTHER DEVELOPMENT APPROVED BASED ON THE NATURE OF EMPLOYMENT IN THE CURRENT UNITS.

Approximately 10% of those employed on the business park live within or very close to Buckland Monachorum parish.

46% of businesses spoken to were started by local people and anecdotal evidence suggests there are more local businesses looking for local premises. Many of the units currently on the site are the ideal size for those currently working from home to make the next move up in expanding their business.

Within planning there is little that can be done to restrict where a business locating to the business park has come from, nor the number of local people it employs.

IF FURTHER DEVELOPMENT WERE APPROVED, WHETHER ANY PARTICULAR RESTRICTIONS ON THE TYPE OF DEVELOPMENT (STRUCTURAL OR USE) WOULD BE APPROPRIATE.

If the site allocation remains within the local plan the wording of the policy should more strongly reflected the location of the site within Tamar Valley AONB, requiring any development to enhance or conserve the AONB's special qualities.

Natural England's response to the consultation highlights that the policy statement including the type of use as,

flexible office spaces and/or light industrial units which are capable of being adapted for different sizes and uses;

is not precise enough to ensure that the character of the area is not adversely harmed.

Therefore if the site allocation is to be brought forward much more detail regarding the nature of business allowed on the site will be required.

THE VALIDITY OF MATTERS RAISED IN LETTERS OF OBJECTION BY LOCAL RESIDENTS (IN PLANNING TERMS) TOGETHER WITH EVIDENCE FROM WDBC JUSTIFYING THEIR PROPOSAL.

The primary concern from local residents in response to the local plan consultation was increased traffic and associated air and noise pollution.

Within the supporting documents with Our Plan no concerns regarding access and traffic were raised, in fact the evidence presented supports

development of this site because of its ease of access to the A386, and from there to Tavistock, Plymouth and further afield.¹⁷

However both Tamar Valley AONB and Natural England raised concerns about traffic increase and its impact on the special qualities of the AONB.

The incidental traffic survey undertaken as part of this review suggests approximately 25% of traffic at the War Memorial junction at peak time was the result of the business park.

Much more detailed analysis is required to ascertain the impact of development would have on traffic flow and how this will be mitigated to ensure conservation of the AONB's special qualities.

The second most common objection regarded the omission within the policy to acknowledge the location of the site within the Tamar Valley AONB. This omission and its implications for the overall policy are documented in earlier sections of this report.

CONCLUSION

The location of the site within Tamar Valley AONB has been over-looked within the wording of the policy, yet this is of high importance with regards the NPPF.

In summary insufficient evidence of the exceptional circumstances required by the NPPF to justify an expansion of the business park to the scale of that proposed by OP19.

¹⁷ Buckland Monachorum Parish Site Information Table, 2014 - <http://www.westdevon.gov.uk/CHttpHandler.ashx?id=11826&p=0>

APPENDIX A

Dear Rebecca,

I apologise for the delay in responding to the above consultation - I had thought I had sent our response to West Devon Borough Council and have just realised that I hadn't sent the finalised response onto West Devon Borough Council. I hope that the following representation will still be taken into consideration.

I am writing on behalf of The Tamar Valley Area of Outstanding Natural Beauty (TVAONB) to formally object to this proposed policy and identification/allocation as an Area of Employment Opportunity. I would also confirm that the TVAONB is aware that the allocation does not constitute a planning application.

The reasons for our objections are as follows;

1. The site is situated within the AONB, a designated landscape that is afforded equal weight to the National Park. This is not reflected in the wording of the OP19 policy that simply refers to the setting of the National Park. As confirmation the site would be located within the AONB that borders the National Park and therefore any development plan policies and indeed major planning applications would need to comply with the guidance set out in the NPPF and specifically paragraph 116. Smaller applications would need to comply with paragraph 115 of the NPPF and all applications should be determined with regard to the adopted TVAONB Management Plan (2014-2019) and relevant Development Plan policies.

2. Further to the above the LPA needs to be satisfied that any policy, allocation or application of the scale indicated would need to satisfy the duty placed upon the LPA by the CRoW Act 2000. This issue has been recently re-clarified in the judgement delivered by Justice Mr Hinckinbottom in the case of the application for Judicial Review (case no. CO/6597/2013). The judgement under paragraph 5 noted the responsibility of the LPA in carrying out any of its statutory functions in that *“Under the relevant statutory provisions (notably Part IV of the Countryside and Rights of Way Act 2000), the sole criterion for designation of an AONB is that the outstanding beauty of the area makes it desirable that particular protections should apply to it. Under sections 84(4) and 85(1) of the 2000 Act, a planning authority must take steps to accomplish the purpose of conserving and enhancing the natural beauty of an AONB; and must have regard to that purpose in exercising any function in relation to, or affecting land in, an AONB”*. (emphasis added). This duty is applicable to plan making as well as the determination of applications within the AONB and its setting. Given the lack of reference to the AONB within the policy or its preamble it is unclear how the LPA has met its duty under the CRoW Act 2000.

3. Development of the site would have the potential to create substantial impacts upon the character of the landscape and the settlement being a gateway to village and visible from a number of locations in the locality. The policy is not currently supported by any supplementary planning document on how the site would be best developed with the enhancement and conservation of the AONB in mind. As a result the policy does not comply with the requirements of paragraphs 115 or 116 of the NPPF.

4. The designation and the AONB Management Plan are statutory considerations in the development of planning policy and for development proposals. The policy as it currently stands is considered to be in conflict with the NPPF due to a lack of

wording indicating that any development of a major scale whether in whole or phased must demonstrate exceptional circumstances, that they are in the public interest and include assessment against the 3 criteria under paragraph 116. The policy does not mention this nor acknowledge that this could impact upon the scope for development on this site and indeed whether development of this nature can be accommodated and impacts mitigated. The policy as it is currently drafted is not considered to meet the requirements set out under the Planning Practice Guidance (paragraph: 010 Reference ID: 12-010-20140306) in that;

"where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)".

5. The proposed allocation would likely lead to development that in terms of the locality would be unsustainable. The site is not readily accessible by means other than private vehicles and the nearest shops/services are located at Yelverton which is some distance from the site. The AONB is aware that the existing industrial estate is currently subject to traffic flows, but is concerned that an increase in use of a similar nature on the scale indicated will intensify these flows as well as the potential harmful outputs such as noise and visual impact. Again these would harm the special qualities of the AONB. The argument that there is a similar existing use adjacent is not considered adequate to justify further erosion of the landscape quality in this well frequented area of the AONB. The policy would not as yet appear to have proven that it has been formulated in line with the relevant paragraphs on Plan-Making as set out within the NPPF, notably paragraphs 151, 152, 153, 154, 155, and 157 in relation to planning for sustainable development.

6. Criterion (d) of the policy indicates that proposals would be considered that include live-work units. The TVAONB would suggest that this is very vague in terms of wording and does not provide any indication of how many units this would be, what percentage of floor space would be given over to living accommodation and work space or how the units will integrate with the site or indeed the settlement. It also needs to be established how this will lead to the holistic development of the settlement that has already been subject to developments that have not provided ancillary benefits to communities that would help offset impacts. The parish is preparing a Neighbourhood Plan and at the present time there are already indications of the types of potential infrastructure that would foster better social cohesion, provide environmental benefits and support the sustainable growth of the settlements within Buckland Monachorum Parish. It is not clear how this development will contribute to this process or how it fits with the future aspirations of the communities it would affect.

The TVAONB would suggest that the LPA needs to assess this allocation and policy against the NPPF guidance in terms of its compliance with paragraph 116 given the site area involved and irrespective of whether the site is developed in one phase or piecemeal, as the cumulative impact will be the same in either scenario.

Should the LPA determine that the policy and allocation are compliant with its duties under the CroW Act, the NPPF and adopted AONB Management Plan then the comments below also apply;

The TVAONB would want to see reference within the policy to the AONB designation and the AONB Management Plan that has been adopted by WDDB, CC and SHDC. It should be stated within a separate criterion that any development proposals should enhance and conserve the special qualities and

features of the AONB and its setting. Given that the site is within the AONB and adjacent to the DNPA it would be logical for this criterion to be placed above criterion (f) in the policy wording to emphasise the equal status that the AONB enjoys with the National Park under the CRoW Act and within the NPPF and to acknowledge the fact that the site is within this nationally designated landscape. The issues relating to a scheme's compliance with paragraphs 115 and 116 of the NPPF should also be iterated within any such criterion under the policy.

Given the site's sensitivity the policy is not at the present time suitably worded to ensure that the AONB's special qualities and features are enhanced and conserved as required by the NPPF and the Management Plan. The TVAONB would like to know if this site will be covered by any SPD setting out how it will be developed in terms of sustainability, landscape, etc., or if the wording of the policy will be revised to reflect this, should the LPA seek to keep this allocation in the Plan.

The TVAONB is aware that the LPA is required to produce a plan that reflects the needs of its communities and to plan positively for development and infrastructure. The TVAONB is also aware of the evidence base available to WDBC, in particular the findings of the DR Business Survey Final Report (2015) and the Economic Growth Advisor Study (2014). Whilst these findings are acknowledged it is evident that they are not in themselves policy documents or indeed concerned with the other material planning considerations related to the allocation of land for development.

The TVAONB would ask the LPA to reflect on the matters raised in this consultation response and to consider if this allocation is the most suitable, not only in the context of the AONB and adjacent National Park that forms its setting, but also in terms of a sustainable approach to delivering the appropriate economic growth and social and environmental benefits for the communities affected.

At the present time the TVAONB objects to this allocation and the policy wording as currently drafted and is of the view that the policy does not indicate how development of the site as a whole or in phases could satisfy the requirements set out under the CRoW Act 2000, paragraph 116 of the NPPF and the AONB Management Plan (2014-2019) or that they would be required to do so.

Yours sincerely

Corinna Woodall

Corinna Woodall

Manager Tamar Valley AONB