

## **COMMENT FORM**


### **Final Draft Local Plan Consultation: 16 September – 1 November 2019**

Your comments will help us and the Inspector to identify any issues with the Plan relating to soundness, legal compliance and compliance with the Duty to Cooperate, and any changes to the Plan which may therefore be needed prior to adoption. Please carefully read the [accompanying guidance](#) before answering the following questions.

Responses must be received by 5pm on Friday 1<sup>st</sup> November 2019 for your comments to be taken into account. View the Dartmoor Local Plan (2018-2036) Final Draft at [www.dartmoor.gov.uk/localplanreview](http://www.dartmoor.gov.uk/localplanreview).

### **PART A - About You**

Personal details

First name *	Peter							
Surname *	Brown							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident	<input type="checkbox"/>	An agent	<input type="checkbox"/>	A Town / Parish Council	<input type="checkbox"/>	An organisation	<input checked="" type="checkbox"/>
	A business	<input type="checkbox"/>	A visitor	<input type="checkbox"/>	A statutory agency	<input type="checkbox"/>	Other (specify below)	<input type="checkbox"/>
Other								
Job title (where relevant)	Director							
Organisation (where relevant)	Newton and Noss Environment Group 							
On behalf of (where relevant)								
Did you submit comments on the Regulation 18 (First Draft) Local Plan?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>				

\* Required field

### **Data Protection Act 2018**

Your personal data will be securely held by Dartmoor National Park Authority for the purpose of assisting with the Local Plan Review process. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has commented on the plan. For the purposes of the examination, we will share your personal details and representation with the Inspector appointed, and publish your name and representations as part of a report on our website. For more information please refer to our [Forward Planning Privacy Notice](#).

Tick the box below if you would like to be added to our Local Plan consultee database and kept up to date with the Local Plan Review process and other planning policy matters.

☒ X I would like to be added to the Local Plan consultee list

### **PART B - Your Comment**

Please carefully read the [accompanying guidance](#) before answering the following questions.

Your comments should relate to specific areas of the plan, so please tell us the policy or paragraph number that your comment relates to. If there are areas which you believe not to be sound or legally compliant, please tell us why, and what changes you deem necessary, sharing any evidence you have to support your proposed changes.

If this is a report or any other document which cannot be shared via this form then you can email it to us at [forwardplanning@dartmoor.gov.uk](mailto:forwardplanning@dartmoor.gov.uk).

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		
ii) Sound		no
iii) Compliant with the Duty to co-operate		No

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

The Newton and Noss Environment Group has been established since 2006. We are concerned with conserving local habitats for wildlife and plants, and to increase the native biodiversity, and where possible combat the invasion of native species with the cooperation of professional agencies such as Natural England and AONB.

**We have concerns about the whole philosophy of this plan, and therefore cannot comment on specific itemised minutiae but rather on the principles that these points display.** We have used your form as far as possible, but it is not really designed for a critical analysis. Our apologies for this, and we hope we have conveyed our thoughts better to you in this way.

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4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

- a. Are you legally compliant? Most of the world has now recognised we have a **climate emergency**, and indeed you (Dartmoor National Park Authority) declared one yourselves on 26<sup>th</sup> July 2019, yet this plan does seem to recognise that all of us, even the DNPA, must respond strongly and positively to this emergency.
- b. May I draw your attention to your own priorities? They are states as:
  - i. National Parks First Purpose – To **conserve and enhance** the natural beauty, **wildlife** and cultural heritage of the area
  - ii. Minimise our impact on climate change
  - iii. Respond to climate change.

Your plan pays no respect to the **IPPC evidence** reports, to the **Paris Agreement**, nor even to the rather weak targets set by our own government. It is as if DNPA exists in its own bubble out with the planet and even its own declarations! Your priorities are therefore not followed in the plan.

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**Please note:** where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?



<del>No. I do not wish to participate in hearing session(s)</del>	X	Yes. I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

Because you do not appear to be receiving any advice on the very serious state that the natural world is currently in, or are choosing to ignore it and carry on largely as before.

**Thank you for sharing your comments on the final draft Local Plan for Dartmoor. If you have more comments to share, please complete parts C-F below.**

Following this consultation, the final draft Plan along with all comments made will be submitted for examination by a Planning Inspector. The Inspector will consider whether the plan complies with the relevant legal requirements and whether it is sound (see guidance). Keep up to date on our progress by [signing up to our Local Plan consultee list](#), and following us on Twitter [@DartmoorPlan](#) and Facebook [/DartmoorPlan](#)

### **PART C - Additional Comment (1)**

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	See below
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	Yes	No
i) Legally compliant		See below
ii) Sound		See below
iii) Compliant with the Duty to co-operate		See below

3. Please tell us why you have answered **yes** and / or **no** to the question above.  
Fully explain your reasoning and try to be as precise as possible.

- c. If you are not responding to the climate emergency, what exactly are you trying to conserve on the Moor? It would appear to be a post-industrial, early 20C status. The moor is now generally an over-grazed heathland with trees confined mainly to the steep river valleys. The **biodiversity** of this landscape is far lower than it would be if allowed to develop into a "natural" mixture of open canopy woodland, and moorland, rather than the result of human activity which it represents. In reality it is a "human artefact" landscape, managed to favour sheep rearing rather than biodiversity. Yet elsewhere we are all being encouraged to cut back on our lamb and beef eating, and the EU CAP is due to be replaced by a policy that rewards **improving the Natural Capital** of the land, which is totally at odds with your plan. Your practice of burning the gorse (swaling) within the park is an example of this traditional, but inappropriate, management and in the process kills thousands of reptiles, small mammals, insects and tree seedlings, and poisons the atmosphere we breathe with smoke containing particulates, CO<sup>2</sup>, dioxins and other noxious chemicals. You are doing the opposite of improving the natural capital of the land in your care, and your policy **1.2(2) Sustainable development in Dartmoor National Park** of maintaining this status quo is actually anything but sustainable.
- d. The UK has the **least tree cover in Europe**, around 13% (<https://forestresearch.gov.uk>), compared with 45% EU average (<https://www.europeanwood.org.cn>), while that of Dartmoor is only reported by you to be even less at 12.5% (ref. DNP "Farming and Forestry Review Paper Feb 2019"). However even 40% of this small cover is, in our opinion, inappropriate being mainly Sitka Spruce rather than indigenous Pinus sylvestris or mixed native deciduous species. The Parkland could probably manage to increase the proportion of its mixed woodland to 70% at the expense of open moorland, without losing any of its more important habitats.
- e. The **mire and blanket bog habitats** are very special and must be conserved, and sufficient open spaces kept for ground-nesting birds such as lark, but significant areas should also have their grazing restricted in order to allow **reforestation by indigenous species**, with fencing if need be. There is too much dominance of the one over-grazed habitat. While beauty may be in the eye of the beholder, the invertebrate, mammal and bird count in such a suggested mixed landscape is undoubtedly of much greater visual value than the present open moorland, and would enhance the nature experience including the biodiversity for those



enjoying the recreational opportunities in the Park. The Park in other words should have a greater diversity of habitat and interest than a present, increasing the tree biomass considerably, and enhancing the experience of visitors. Grazing animals, sheep and ponies, help keep the open spaces open, but overgrazing tends to create a monoculture.

- f. The rentals paid to landowners and commoners compensates any loss of earnings from reduced grazing from reforestation, and as subsidies for uneconomic upland farming are likely to be changed soon to a system of compensation for adding value to Natural Capital, this change of use should be welcomed.
- g. None of us can ignore the global **Extinction Crisis**. The latest **State of Nature Report** (2019) shows a further steady decline in biodiversity in the UK, and the National Parks should be showing a good example by leading the way in reversing this potentially catastrophic trend. The report shows that 41% of UK species studied have declined, 33% show little change and only 26% have increased since 1970. The Science Director at the National Trust, Rosie Hails, said "We are now at the crossroads, and we need to pull together with actions rather than words to stop and reverse the decline of those species at risk as well as protecting and creating new habitats in which they can thrive."
- h. Those penning this Report must understand that, in order to preserve life as we know it for our grandchildren and beyond, we will have to take **actions** that have been likened to putting the nation on a war footing. Everyone must play their part, and DNPA should not try to avoid the draft!
- i. While the Climate Emergency is having, along with other factors, a catastrophic adverse effect on nature, the origin is recognised to lie in our burning of fossil fuels, and it is therefore imperative that we achieve (not "aim" or "target") **Zero Carbon** as soon as possible. Yes, the transition will be uncomfortable, but not doing so is far more unthinkable, and ultimately costly!
- j. Zero Carbon can only be achieved by a combination of switching to **renewable energy**, and **sequestering carbon**. The latter has already been alluded to by suggesting a significantly greater increase in the tree biomass on the moor, young forest locking up 6 tonnes of carbon per hectare per year, so that Dartmoor's potential for this single action works out around 412,000 extra tonnes of carbon every year. Also very important is acting to ensure the moorland peat remains wet (CO<sup>2</sup> is released once it dries). The huge carbon sequestering abilities of peat have only recently been fully realised.
- k. But Dartmoor must play its part in renewables (RE) as well. Very little RE exists within the Park (about 9MW). Renewable energy installations such as solar and wind should be allowed discreetly in locations close to local populations in and around the moor. This has been achieved successfully elsewhere in sensitive areas. For example, the wind turbine at South Brent is in **community ownership** and has made a great difference to the local community by encouraging and financially assisting the difficult transition towards zero carbon locally. Likewise, the parishes around the Yealm Estuary have community ownership through Yealm Community Energy of a 5MW solar farm at Newton Downs, and a second, 7.3MW, is under construction at Creacombe Both are in an AONB. Again, the surplus funds from the farms are being put to good use lowering the community carbon footprint in 5 parishes and enhancing the Natural Capital in the area. These are models that DNPA could follow with justification ([www.yealmenergy.co.uk](http://www.yealmenergy.co.uk)).
- l. Additionally, consideration should be given to **commercial wind turbine** location at higher altitude where the conditions are particularly favourable for them. **Policy 6.6 (2) states: "3. Large scale RE development will not be approved"** and we therefore feel this policy is not appropriate under the present circumstances. I have just returned from Scotland and the Pennine areas, where wind turbines have been deployed with great effect, and have not interfered with any pre-existing activities. Nor would they interfere with the re-forestation policy mentioned in c. above.
- m. How can you reconcile this policy 6 with your description of the plan "put(ting) climate and environment at the centre of policy and practice"? You need to understand that to avoid climate disaster the transition requires "... a rapid, far-reaching and unprecedented changes in all aspects of society" (IPCC). 60%-70% of Devon's wind potential is located on Dartmoor, and if Devon is to achieve its carbon neutrality you cannot afford to squander that resource.
- n. Devon County Council has declared it wants to go Carbon Neutral, but in order to do this the combined cycle gas fired power station at Langage, close to the south west boundary of the Park, will have to close. Wind turbines on Dartmoor would more than compensate for this loss.

- o. You must understand that these transitional projects (something better will evolve eventually but we don't have time to wait) are temporary (20-30 years) and due to modern construction methods, the land can be completely restored "as was" on completion of the planning period.
- p. We therefore urge you to change your priorities and philosophy of management of the Park to consider the Climate Emergency and 6<sup>th</sup> Mass Extinction which we are currently witnessing. Everyone must play their part, which amounts to much more than just 'housekeeping'. Live up to your own words:  
**"the purpose is to put climate (and environment) at the centre of policy and practice."**

NOTHING COMPLETED BELOW THIS LINE

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4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

**Please note:** where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

<input type="checkbox"/>	<b>No</b> , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	<b>Yes</b> , I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

## PART D - Additional Comment (2)

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	<b>Yes</b>	<b>No</b>
<b>i)</b> Legally compliant		
<b>ii)</b> Sound		
<b>iii)</b> Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.



See above

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

As in Part B

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5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

	<b>No</b> , I do not wish to participate in hearing session(s)		<b>Yes</b> , I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

### **PART E - Additional Comment (3)**

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	<b>Yes</b>	<b>No</b>
<b>i)</b> Legally compliant		
<b>ii)</b> Sound		
<b>iii)</b> Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

**Please note:** where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

	<b>No</b> , I do not wish to participate in hearing session(s)		<b>Yes</b> , I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

**PART F - Additional Comment (4)**

1. Please tell us which paragraph or policy your comment relates to

Paragraph (enter number, e.g. 4.5.1)	
Policy (enter number, e.g. 4.5)	
Policies Map	

2. Please carefully read the accompanying guidance and tell us if you consider the Local Plan to be:

	<b>Yes</b>	<b>No</b>
<b>i)</b> Legally compliant		
<b>ii)</b> Sound		
<b>iii)</b> Compliant with the Duty to co-operate		

3. Please tell us why you have answered **yes** and / or **no** to the question above. Fully explain your reasoning and try to be as precise as possible.

[Additional space on final page]

4. If you do not consider the Local Plan to be legally compliant or sound, please tell us what change(s) (or 'modifications') you consider necessary to make the Local Plan legally compliant and/or sound, and **why** these changes will make the Local Plan legally compliant and / or sound.

[Additional space on final page]

**Please note:** where changes to the Local Plan are proposed, your comments should provide concisely all the evidence and supporting information necessary to support your suggested changes. You may not have a further opportunity to submit this evidence.

5. If your representation seeks a change to the plan, do you consider it necessary to participate in examination hearing session(s)?

<input type="checkbox"/>	<b>No</b> , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	<b>Yes</b> , I wish to participate in hearing session(s)
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6. If you answered **yes** to the hearing session(s), please tell us why you consider this to be necessary.

**Additional space** (please tell us which question you are continuing from):



***If you require help, or would like to receive this form in an alternative format, please contact the Forward Planning team:***

Forward Planning, Dartmoor National Park Authority  
Parke, Bovey Tracey, Devon, TQ13 9JQ

Tel: 01626 832093  
Email: [forwardplanning@dartmoor.gov.uk](mailto:forwardplanning@dartmoor.gov.uk)  
Website: [dartmoor.gov.uk/localplanreview](http://dartmoor.gov.uk/localplanreview)