

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 1st 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.

PART A - About You

Personal details

First name *	Tony							
Surname *	Whitehead							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident	<input checked="" type="checkbox"/>	An agent	<input type="checkbox"/>	A Town / Parish Council	<input type="checkbox"/>	An organisation	<input 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)								
Organisation (where relevant)								
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.

YES, 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.

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		
iii) 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.

Two months ago, DNPA declared a **climate and ecological emergency** with a target of being carbon zero by 2025. I believe strongly that the proposed local plan should pause to consider if it is fit for purpose considering this declaration. While many aspects of the plan are good, there currently could be more in the plan to enable both DNPA or the communities that reside in the park boundary to both mitigate for and adapt to the climate emergency.

[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.

On the climate emergency in specific there are four areas where I believe improvements can be made:

1. Renewable Energy Creation
2. Sustainable New Housing and Energy Efficient Buildings
3. Transport
4. Sequestration Strategies

I will expand on each of these in the comments below.

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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)?

<input type="checkbox"/>	No, I do not wish to participate in hearing session(s)	<input type="checkbox"/>	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.

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)	
Policy (enter number, e.g. 4.5)	Policy 6.6
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		

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Policy 6.6.3 Large scale renewable energy development will not be approved.

“Dartmoor is not an appropriate location for large scale energy development aimed at power generation to support national and regional energy supply. Wind energy and solar photovoltaic farm development in particular can significantly harm the National Park’s Special Qualities.” (DNP LP 6.3.2 p129)

The argument relies heavily upon DNPA’s desire to avoid affecting the park’s areas of tranquillity or having any visual/sound/environmental/ecological impact. However, I believe that given the climate emergency this is no longer an acceptable position.

Household energy consumption will be one of the main causes of CO2 emissions in the park area. Five of the eight towns and most of the villages are on the outskirts of the park in areas that are largely indistinguishable from any other parts of rural Devon.

These settlements and their environs should certainly not be limited in their capacity to develop their own larger scale renewable energy projects, as they are not areas of high conservation concern or special tranquillity and do not reflect the park’s special qualities and landscape.

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Reword Policy 6.3.3 to read: Large scale renewable energy development will be supported approved within the park boundaries where it does not significantly effect the unique character and natural heritage of the park.

Settlements on the outskirts of the park should be supported to develop larger scale renewable energy capacity so that they may become more sustainable and resilient. As with any large-scale renewable energy system placement there will of course still need to be stringent rules to make sure that there is no potential for ecological harm or local disturbance, but there should definitely be the possibility of setting up such schemes at the very least around the edges of the park.

A very effective way for towns and villages to take personal responsibility, become more resilient and energy secure, is through the creation of local community energy schemes that are run as co-operative ventures by and for the local people.

Community energy schemes can help to create money to support other community projects, reduce energy bills, reduce the community's carbon footprint, & keep local money in the local area. This approach is certainly supported & encouraged by the Government as it attempts to mitigate climate change (the NPPF states that local planning authorities "should support community-led initiatives for renewable and low carbon energy"), but if DNPA adopts the no large scale renewable energy projects policy for the whole of the DNP area it could potentially stifle people's capacity to adopt effective proactive methods that could actually have a positive mitigating impact.

As many of the local town councils within & around the DNP have made Climate Emergency Declarations and now have community groups who are attempting to find effective ways to reduce their impact on the climate, these initiatives should be whole heartedly supported by the DNPA.

Friends of the Earth recommends the following local plan draft policy on community owned renewable energy:

"The social and economic benefits of community owned renewable energy generation proposals which demonstrate ownership by and led by local communities will be actively encouraged and supported. Communities will be encouraged to consider sites for appropriate renewable energy installations. Where communities wish to bring such schemes forward utilising a community ownership model, the authority will support and facilitate this as appropriate through the planning process. Given the need for widespread deployment and the benefits of community owned schemes in delivering local decentralised energy supplies therefore contributing to the sustainable development of their locality - there will be a presumption in favour of supporting such development within the authority area."

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<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	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.

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)	Section 1.6.10 and 1.6.11
Policy (enter number, e.g. 4.5)	Policy 3.2.2
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		

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.

Policy 3.2.2 All new housing should meet and not significantly exceed nationally described technical housing standards

At a time when the national standards are seriously below the level that we need them regarding energy efficiency and insulation, it would seem to be far more sensible to say that it should *significantly exceed* those standards. It is hoped that local authorities will continue to have the powers to set high standards following the current government review.

Section 1.6.10 The hierarchy of measures for reducing a building's impact on climate change involves: 1) Minimising energy consumed in making construction materials and the process of construction. 2) Using passive design to minimise energy consumption during a building's use 3) Generating renewable energy locally.

Section 1.6.11 Strategies 1) and 2) have far greater energy saving potential and should always be considered before renewable energy generation. This is called a 'fabric first' approach and will be encouraged in all new development.

Given the climate emergency I would challenge this "fabric first" approach because we need to expend effort in all areas equally, and it is vital that we both promote renewable energy **and** reduction in consumption at the same time. One is not a substitute for the other.

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Reword Policy 3.2.2 to read: All new housing within DNPA area will significantly exceed nationally described technical housing standards with regards to energy efficiency.

Reword Sections 1.6.10 and 1.6.11 to remove the "fabric first" approach and emphasise that both mitigation and adaptation will require equal effort to be given to both renewable energy generation and energy efficiency.

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	No , I do not wish to participate in hearing session(s)		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.

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)	Section 4.3
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		

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.

On transport, a few general points and suggestions to make this section stronger:

Consideration might be given in the Local Plan to introducing “congestion charges” as a positive way to encourage consumer switch to lower emission and electric vehicles and a “tax” on high emission cars. This has I believe been considered previously in other national parks such as the Peak District.

On EV charging points:

1. The electricity for these should be supplied by zero-carbon suppliers.
2. The plan could also support the provision of solar PV on car parks linked to charging points
3. The plan could be more ambitious on active EV points on more than 5% of car parks – the demand for electric vehicles local might increase if points are made available.

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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)	Policy 2.3
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		

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.

Policy 2.3 ...maximise potential for other environmental gains; including soil, water and air quality, natural flood management, carbon sequestration and pollination

The only direct mention of carbon sequestration in the report is in policy 2.3. Given the existing and potential importance of Dartmoor's soils for sequestering and storing carbon, and the increasing emphasis on "Natural Climate Solutions" it would be good to see greater mention of this in the report, and some specific policies and and guidance.

Closely linked to this I notice that the plan does not mention rewilding at all. Again, with the natural world as a key ally in both mitigating and adapting to climate change, it would surely be good to have direct support in the plan for rewilding initiatives.

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<input type="checkbox"/>	No , I do not wish to participate in hearing session(s)	<input type="checkbox"/>	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.

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 Tel: 01626 832093
Parke, Bovey Tracey, Devon, TQ13 9JQ

Email: forwardplanning@dartmoor.gov.uk
Website: dartmoor.gov.uk/localplanreview