

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 *	Sophie							
Surname *	Phillips							
Address	[REDACTED]							
Post code	[REDACTED]							
Email address *	[REDACTED]							
I am completing this form as (choose one)	A resident	x	An agent		A Town / Parish Council		An organisation	
	A business		A visitor		A statutory agency		Other (specify below)	
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		No	x				

* 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)	All – relating to the fundamental principles.
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		x
ii) Sound		x
iii) Compliant with the Duty to co-operate		x

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.

I believe the Local Plan is not legally compliant because in policy 6.6(2) it directly contradicts the legally binding national carbon reduction targets because it prevents large-scale renewable generation on the moor.

I believe the Local Plan is not sound because it is not an appropriate strategy to meet the needs of Dartmoor, nor does it accommodate the needs of neighbouring authorities such as Devon County Council, South Hams District Council or Teignbridge District Council to contribute towards their carbon reduction targets. It is definitely not consistent with achieving sustainable development, it only aims to preserve the status quo, the 'special qualities' being the far reaching views and the wild barren landscape – which is not actually the natural landscape of Dartmoor, as it is created by burning gorse to prevent growth. I believe that the Plan contradicts DNP's own Climate and Ecological Emergency Declaration and prevents DNP from achieving its own aim to become carbon neutral by 2025. The NPPF has a presumption in favour of sustainable development (paragraph 11), so that sustainable development is pursued in a positive way and:

"c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

This cannot be achieved by banning large scale renewable energy which will be necessary to mitigate the damaging effects of climate change on current and future generations, and on biodiversity. Banning large scale wind is not an effective use of land.

According to the IPCC report we have 10 years to act and make a difference to prevent some of the most catastrophic impacts of climate change, we will not be able to do this on Dartmoor and play our part in the opportunities a low carbon economy presents if we ban large scale renewable energy generation. Onshore wind and solar are the cheapest forms of energy generation we have according to the UK government^[1], and are the technologies most able to support us to achieve net zero by 2050, but they have been singled out in policy 6.6(c) as unacceptable for Dartmoor.

^[1]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/566567/BEIS_Electricity_Generation_Cost_Report.pdf

And I believe the Local Plan is not Compliant with the Duty to Co-operate, because how could it possibly be when Dartmoor has some of the best wind resource in the country and neighbouring authorities will also need to plan strategically how they will achieve net-zero carbon, which means generating more renewable energy. Wind is only part of the solution, but in the South West we must make use of it.

Personal comments:

I am a regular trail runner and one of my favourite things about Dartmoor is the barren landscape, the wildness and the far reaching views. I love the tumbling streams that become raging torrents in heavy rain and the mossy ancient woodlands, I love the freedom to roam almost anywhere I want, but these things can all be preserved without banning large scale renewable development. In the current climate emergency I believe my personal preferences for the things I enjoy in my leisure time are not as important as preventing irreversible and devastating climate change as described by the IPCC Special Report on Global Warming of 1.5°C.

I am very sad to see that DNPA have not prepared this plan in light of the Climate Emergency.

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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.

I believe we should be taking a proactive approach, designating sites for wind and solar energy generation, particularly on the fringes of Dartmoor where community energy organisations like South Dartmoor Community Energy, and South Brent Community Energy Society have already set up thriving groups of local people who want to play their part in a fair low carbon future. New renewable energy developments should have strict conditions to enable community ownership so that the economic value of such developments is retained locally. I understand that by introducing this ban that DNP is trying to protect the 'unspoilt qualities' of Dartmoor, but climate change is a far bigger threat to those qualities, than large scale renewable energy (which may only be in place for 20 years).

DNP is in a unique position to be able to write its Local Plan to address the Climate and Ecological Emergency, whereas many other Local Plans were finalised before the IPCC Special Report was published in 2018.

This is a very difficult time for the whole of society, and I understand how scary it must feel as decision makers to need to consider totally rethinking the Parks purpose and priorities, but we cannot continue with business as usual, we must make radical changes to our lifestyles and our priorities. I believe DNP need to rewrite the plan through the Climate Emergency lens. Of course there will be many people who are unhappy with the prospect of wind turbines on Dartmoor, but that is only because they don't truly understand the scale of the crisis and the scale of the measures we must take to mitigate this. DNP could work with the local community energy groups to educate the general public. Although there is a very vocal anti wind lobby, more than 70% of the public are actually in favour of on-shore wind. And there is a huge quiet majority who will support action that DNP takes to tackle the climate emergency.

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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 checked="" 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.

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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](#)