

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 *	Stephen							
Surname *	Sterling (& Jem Friar)							
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)	Emeritus Professor, Plymouth University							
Organisation (where relevant)	Ashburton Climate Emergency (ACE)							
On behalf of (where relevant)	This comment represents the views of the 8 people (citizens & town councillors) that sit on the coordinating Hub of ACE (Ashburton Climate Emergency response group), which was created by Ashburton Town council after declaring a "climate & ecological emergency" in April 2019. It also represents the wider ACE community initiative, in particular the ACE Energy group & the ACE Transport group who contributed with feedback, research & suggestions.							
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.

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)	Strategic policy 1.2 (2) b and c
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	yes	
ii) Sound		no
iii) Compliant with the Duty to co-operate	yes	

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.

Whilst the answers above are 'yes' we note that 'sound' is a matter of judgement and in our view the Plan is less robust than it should be with regard to the following:

i) line b) mentions 'minimises our impact on climate change'. This phrase is used extensively throughout the Plan but is hardly elaborated. So – to what degree under any particular policy is it intended to minimise impact, are there targets, for example? In practice, the minimisation and mitigation might be slight unless more detail is given on how it is to be actioned.

ii) line c) mentions 'respond to climate change through community resilience and adaptation', but we find through the Plan that there is barely any mention of 'resilience' (save a small inclusion in relation to biodiversity), or 'adaptation' even in relation to flood management. There is no acknowledgement of the strong likelihood of extreme weather events, and virtually no coverage or elaboration given to adaptation as a key principle and strategy in tackling climate change (unlike in Devon County Council's Climate Change Strategy). It is not clear how community resilience will be encouraged or supported, or what this term means to DNPA.

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.

Given scientific evidence that climate change appears to be accelerating, we feel that the Plan as a whole does not acknowledge sufficiently this overriding context - which will affect landscapes, wildlife, infrastructure, construction and communities adversely in the long time frame of the Plan and beyond. In other words, there is a degree of mismatch between the well- intentioned sustainable development policies outlined in the Plan, and the pressing realities and prognoses of what is widely acknowledged as the 'climate crisis'.

This acknowledgment includes of course DNPA's 'Climate Emergency Declaration' of 26 July 19, which states in para 4.1 that 'the Authority has a role to play in leading initiatives within the National Park aimed at mitigating climate change and/or adapting to it.' So we recommend that the Plan is reconsidered in the light of DNPA's Declaration (which emerged after the draft Plan was completed), that it is strengthened wherever possible to better reflect this new emphasis and the real threats that climate change presents. Put alternatively, it needs to be anticipative with regard to the projected effects of climate change that the scientific community predicts. Ensuring consistency and congruence between these two key DNPA policy documents will help ensure that both are sound and mutually complementary.

We consider that you might find the Exmoor Park Plan 2011-31 a helpful example - being more coherent and articulate on climate change, its likely effects on the moor and as regards the Plan's presentation of mitigation and adaptation policies https://www.exmoor-nationalpark.gov.uk/data/assets/pdf_file/0011/1493498/Local-Plan-2011-2031-for-web.pdf

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)?

X	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.

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)	6.6 (2)-3
Policy (enter number, e.g. 4.5)	6.6 (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		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.

We believe that the present plan is not consistent with the National Planning Policy Framework on several counts.

The Local Plan currently says that it will not allow any large scale renewable energy development.
“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 p129)

The argument relies heavily upon DNP’s desire to avoid affecting the park’s areas of tranquillity or having any visual/sound/environmental/ecological impact.

Firstly, from the perspective of the goal of achieving Sustainable Development (*“meeting the needs of the present without compromising the ability of future generations to meet their own needs”*) the NPPF states that the planning system has 3 overarching objectives – economic social & environmental, which need to be pursued in mutually supportive ways.

The economic objective requires *“identifying & coordinating the provision of infrastructure.”*
 The social objective requires the provision of *“accessible services”*.

We feel that allowing the development of locally based, community owned, larger scale renewable energy sources is part of the duty of providing a reliable & secure infrastructure & accessible service, because:

- We are now at a time when we need to adapt urgently to the impacts of climate change which is likely to require that communities become energy secure & resilient by moving towards having their own energy supply.

- The present energy system is in the beginning stages of its transformation into a much more locally based renewable energy creation & usage system.

The environmental objective requires ***“mitigating & adapting to climate change, including moving to a low carbon economy.”*** This is a very clear directive within the NPPF19.
(NPPF paragraphs 7 & 8)

The DNP's present Local Plan is also not consistent with the National Planning Policy Formula in regards to section 14 about ***“Meeting the challenge of climate change, flooding & coastal change”***. The NPPF is quoted below in support of this claim.

NPPF paragraph 148 it states *“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk & coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability & improve resilience... & support renewable & low carbon energy & associated infrastructure”*.

Paragraph 149 states *“Plans should take a proactive approach to mitigating & adapting to climate change... policies should support appropriate measures to ensure the future resilience of communities & infrastructure to climate change impacts”*.

Paragraph 151 states: *“To help increase the use and supply of renewable and low carbon energy and heat, plans should:*

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.”*

Paragraph 152 states: *“Local Planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in Local Plans or other strategic policies that are being taken forward through neighbourhood planning.”*

Banning large scale renewable energy schemes contradicts the Government's commitments to increase renewable energy resilience, and Devon County Council's climate emergency declaration to which the DNP is a signatory, and as such is non-compliant with its Duty to co-operate, that states they all need to *“deploy more renewable, decentralised & smart energy systems”*. A ban on large scale renewable energy is also inconsistent with fact that the DNP itself has also declared a climate emergency & is aiming to create a carbon neutral park within the next 5 years.

Local Plans should also contain an Implementation chapter detailing how they're going to actually implement the policies within the Plan. As such the implementation plan isn't sufficient as it does not detail how the DNP are going to achieve net zero by 2025.

We do not feel that declaring that large scale renewables aren't viable across the whole of the DNP can be deemed to be appropriate or proportionate - & therefore cannot be justified from a soundness perspective on this count either.

We are presently in a state of climate & ecological emergency. The IPCC states *“Limiting global warming to 1.5°C would require rapid, far-reaching and unprecedented changes in all aspects of society.”* As such we all need to be making unprecedented changes to the way that we do things if we are to effectively reduce the impending impact of climate change to the world & our local communities. This has to include the DNP with its policies and aspirations.

To face the challenge of Climate Change & reduce our CO2 emissions the UK Government has set a target of delivering 15% of its UK energy consumption from renewable resources by 2020. (In 2016 the UK had only achieved 9%.) Local Plans should reflect clear targets on renewable energy generation based on this target.

Household energy consumption & wasted energy will be one of the main causes of CO2 emissions in the park area. There are 8 towns, 34 villages & hamlets, & of course many farms within the DNP boundaries. There is a population of about 33,000. The level of gas fuel connection is very low across much of Dartmoor & the rates of fuel poverty are almost twice the national level in many areas. Many people have to heat their homes with oil which is both expensive & an unclean fossil fuel. The Government is currently consulting on a future ban on oil heating which will impact a great many Dartmoor residents, so it would be wise to make renewable energy contingency plans as flexible & supportive as possible.

Five of the eight towns & most of the villages are actually on the outskirts of the park in areas that would seem totally indistinguishable from any other parts of rural Devon. A key point is these settlements & 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 special tranquillity & do not reflect the park's special qualities & landscape (this is the present argument for not allowing any such schemes). Rather, these settlements should be supported to develop larger scale renewable energy capacity so that they may become more secure, sustainable & resilient.

Local Evidence

In Ashburton we carried out a survey on the high street & online to assess our community's needs & concerns around energy. We have had 92 responders to date and gained the following insights:

- 97% were concerned about climate change.
- 83% were concerned about energy costs.
- 88% were interested in community energy
- 47% were interested in installing solar PVs on their homes (+30% were unable to do so due to living in a listed building, a council home or being renters; =8% already had solar PVs).
- 68% would like help to reduce their energy costs.

As with any large scale renewable energy system placement elsewhere in the country, there will 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 & near to the communities that reside there. If everybody is not encouraged to do all that they can at this point, there won't be a hope of protecting the ecology & biodiversity of the park in the near future as the climate changes.

A very useful & effective way for towns & villages to take personal responsibility, become more resilient & energy secure, is through the creation of local community energy schemes that are run as co-operative ventures by & 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 the DNP 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 have a positive mitigating impact. As many of the local councils within & around the DNP have made Climate Emergency Declarations & now have community groups who are attempting to find effective ways to reduce their impact on the climate & biosphere, these initiatives should be wholeheartedly supported by the DNP.

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.

We recommend 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.

This core strategy policy would need to be supported by areas of search / appropriate site allocation policies within the proposals map part of the Local Plan.

The Local Plan needs to clarify what the exact difference in size is between small scale, medium and large scale renewable energy projects.

It would also be helpful if there was mention of the range of other sustainable energy options in the Local Plan that could be explored, such as ground source heat pumps or air heat pumps, hydro-electric, anaerobic digestion, green power houses & district heating schemes.

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)?

X	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.

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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)	6.6 (2) .1
Policy (enter number, e.g. 4.5)	6.6 (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		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.

Again we believe that the Local Plan is not consistent with the National Planning Policy Framework for the same reasons as stated in our part C comments about large scale renewable energy schemes.

Firstly, from the perspective of the goal of achieving Sustainable Development (*“meeting the needs of the present without compromising the ability of future generations to meet their own needs”*) the NPPF states that the planning system has 3 overarching objectives – economic social & environmental, which need to be pursued in mutually supportive ways.

The economic objective requires *“identifying & coordinating the provision of infrastructure.”*
The social objective requires the provision of *“accessible services”*.

We feel that positively encouraging small scale renewable energy sources is part of the duty of providing a reliable & secure infrastructure & accessible service, because:

- We are now at a time when we need to adapt to the impacts of climate change which is likely to require that communities become energy secure & resilient by having their own energy supply.
- The present energy system is in the beginning stages of its transformation into a much more locally based renewable energy creation & usage system.
- The Government is currently consulting on a future ban on oil heating (the main heating fuel for a very high % of Dartmoor residents, who will need to be supported in their transition to an alternative energy source).

The environmental objective requires *“mitigating & adapting to climate change, including moving to a low carbon economy.”* This is a very clear directive within the NPPF19.
(NPPF paragraphs 7 & 8)

The DNPs present Local Plan is also not consistent with **the National Planning Policy Formula in regards to section 14 about “Meeting the challenge of climate change, flooding & coastal change”**.

NPPF paragraph 148 it states *“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk & coastal change. It should help to: shape places in ways that contribute to radical*

reductions in greenhouse gas emissions, minimise vulnerability & improve resilience... & support renewable & low carbon energy & associated infrastructure”.

Paragraph 149 states *“Plans should take a proactive approach to mitigating & adapting to climate change... policies should support appropriate measures to ensure the future resilience of communities & infrastructure to climate change impacts”.*

Paragraph 151 states: *“To help increase the use and supply of renewable and low carbon energy and heat, plans should:...*

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.”

The Local Plan is also not compliant with the duty to co-operate in this regard, as it is not actively & effectively fulfilling its obligations to support the Devon County Councils Climate Emergency policy which states they will need to *“deploy more renewable, decentralised & smart energy systems”*

As noted in section C, we carried out a survey on the high street in Ashburton & online to assess our community’s needs & concerns around energy. We had 92 responders & gained the following insights:

- 47% were interested in installing solar PVs on their homes (+30% were unable to do so due to living in a listed building, a council home or being renters; =8% already had solar PVs).
- 68% would like help to reduce their energy costs.
- 83% were concerned about energy costs.
- 97% were concerned about climate change.
- 41% stated that they lived in listed buildings (these figures are only available for the 46 people who responded to the online survey as the question was not on the paper survey).

There is clearly a need & desire for small scale renewable energy in Ashburton.

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.

In addition to being *much more* supportive of small- scale renewable energy, the plan needs clearer definitions about what size & capacity of small scale renewable energy is acceptable, so that this does not need to be negotiated & assessed with every planning application.

The Plan is unclear what limits are to be placed on renewable energy eg solar PVs on roofs, in regard to their impact on landscape character or being on listed buildings. We feel that in this current state of emergency & urgency, that any such restrictions should be significantly relaxed so that the communities & residents on Dartmoor are able to take responsibility for becoming more resilient, energy secure & to reduce their contribution to greenhouse gas emissions. (As stated in the NPPF para 149 *“Plans should take a proactive approach to mitigating & adapting to climate change... policies should support appropriate measures to ensure the future resilience of communities & infrastructure to climate change impacts”.*)

It will also be necessary for the Plan to address what applicants can do when they do not have suitable roofs for attaching solar PVs, eg if the roof is thatched or facing an inappropriate direction/angle for collecting the sun’s rays. In such circumstances it would be very helpful to be able to erect solar PVs on a ground base if requested.

Again, It would be helpful if there was mention of other sustainable small scale renewable energy options in the plan that could be explored such as ground source heat pumps or air heat pumps, micro hydro-electric, small scale anaerobic digestion, district heating schemes, etc.

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)?

X	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)	4.5 (2)
Policy (enter number, e.g. 4.5)	4.5 (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		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.

We would like to commend the DNPs enthusiasm for creating Electric Vehicle Charging Points (EVCPs) on new developments but we do not feel that this goes far enough to be in line with the National Planning Policy Framework which requires meeting the NPPFs economic objective regarding *“identifying & coordinating the provision of infrastructure”* & its social objective requiring the provision of *“accessible services.”*

We do not feel that only aiming to require EVCPs to be set up solely within on new developments is anywhere near enough for being prepared for the transport changes that are underway. The Department of Transport has committed to no new internal combustion engines being sold after 2040. The Government’s Committee on Climate Change has said that this will be too late & will need to be brought back to 2035 at the very latest. The Local Plan states that *“there are significant challenges in encouraging use of electric vehicles... Many people see little reason to make greener travel choices...”*, however, it seems not to take into account the fact that these policies are designed to be effective until 2036 when things will be very different.

At the moment there are 27,000 EVCPs around the UK - the Committee on Climate Change states that we will require 8 x that number of chargers. As such, the DNP’s present Local Plan aspirations are far too low & it would be helpful to look at ways to extend the EVCP network far beyond new developments, eg to establish EVCPs in carparks & at various on-street sites within the DNP. (Eventually, when the technology is ready the Park will need to be ready to install under road wireless charging technology as is being trialled in Coventry at the moment. There are a few schemes whereby they could partner with renewable energy companies to make this easier & more affordable.)

Charging with integrity:
 In addition, the DNP’s Local Plan is also not consistent with the NPPF in regards to attaining its environmental objective *“mitigating & adapting to climate change, including moving to a low carbon economy.”* (NPPF paragraphs 7 & 8) or its statement that *“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk & coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability & improve resilience... & support renewable & low carbon energy & associated infrastructure”*. (NPPF paragraph 148) because it makes no mention of where the electricity supplied via the EVCPs should be sourced.

The Local Plan needs to stipulate that all EVCPs can only be powered directly by renewable energy sources.

If the EV charging policy is to be effective at truly reducing CO2 emissions it will require that it is only set up in partnership with an energy supplier that provides only renewable energy. (At present the only two fully renewable energy suppliers are Ecotricity & Good Energy. Ecotricity has been actively supportive in partnering to create EVCPs. Alternatively, if the DNP allowed large scale community renewable energy schemes, they could even supply the electricity directly!) If it is set up with a company that uses a mixed supply of energy but offers a green tariff, the company can state that the share apportioned for this usage is from renewables by reducing the share of renewables that they are providing to other non-

green tariff users. If the electricity is bought from an electricity supplier who does not own their own renewable energy systems or doesn't buy directly from renewable energy suppliers, then they will just be buying REGO certificates without having an effective impact on increasing, supporting & improving the renewable energy sector.

We believe that the Local Plan is also not compliant with the Duty to co-operate in this regard, as it is not actively & effectively fulfilling its obligations to support the Devon County Council's Climate Emergency policy which states they will need to "deploy more renewable, decentralised & smart energy systems"

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.

The DNP needs to be committed to developing an effective, park-wide, renewable energy powered EVCP infrastructure, so that no residents within the DNP lose their capacity to be mobile & so that visitors can also travel around easily by non CO2 producing means.

An alternative for visitors could be to establish several 'park & ride' locations where visitors can pick up local electric buses that can take them to the sights on the moor, so that they are not at risk of running out of power. This would also reduce vehicle use on the moor – reducing carbon emissions & protecting biodiversity.

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)?

X	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 F - Additional Comment (4)

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

Paragraph (enter number, e.g. 4.5.1)	4.3 (2)
Policy (enter number, e.g. 4.5)	4.3 (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		X
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.

The Local Plan only looks at requiring transport sustainability on new developments, whereas it needs to be more proactive at improving transport sustainability across the whole Park. This could be through promoting public transport, & car sharing, or improving footways & bicycle tracks or bike parking or providing bicycle charging points to encourage the use of electric bikes. As such we deem it to be inconsistent with the National Planning Policy Framework which requires meeting the NPPFs economic objective to "identifying & coordinating the provision of infrastructure" & its social objective requires the provision of "accessible services."

When the Local Plan refers to the rail options (4.3.2) we believe that considering such options is once again in contradiction to the NPPFs environmental objective which requires “**mitigating & adapting to climate change, including moving to a low carbon economy.**” (NPPF paragraphs 7 & 8), & paragraph 148 that states “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk & coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability & improve resilience... & support renewable & low carbon energy & associated infrastructure”.

Two of the options mentioned in the Plan are heritage railways that rely on fossil fuels (coal & diesel), & therefore should not be under consideration.

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.

The following additions are recommended:

The DNP recognises the potential for significant modal shift to walking for short journeys and will aim by the end of the Plan period to increase substantially the frequency of journeys under one mile long made on foot. This will be achieved by encouraging:

- the provision of direct, well-maintained and well-lit walking routes, including to and from schools;
- the provision of quality footways in towns and cities and Quiet Lanes in rural areas;
- the slowing down traffic through the use of 20mph zones and Home Zones.
- improved walking related infrastructures;
- Consideration of groups with disabilities or ageing members of the population when designing infrastructures (e.g. increasing pedestrian crossing times)

The Local Plan recognises the potential for a significant modal shift to cycling for short and medium journeys and aims, as a minimum, to quadruple the frequency of journeys made by bike by the end of the plan period. This will be achieved by providing a network of cycle-friendly streets, bicycle parking, electric bike charging facilities, multi-use paths and cycle routes in both urban and rural areas.

The DNP will also actively encourage & support public transport, car clubs & car sharing.

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)?

X	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 G - Additional Comment (5)

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

Paragraph (enter number, e.g. 4.5.1)	1.6(2).2, 1.6.10, 1.7(2) & 3.2(2) 2
Policy (enter number, e.g. 4.5)	1.6(2).2, 1,6.10, 1.7(2) & 3.2(2)
Policies Map	

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

	Yes	No
iv) Legally compliant		
v) Sound		X
vi) Compliant with the Duty to co-operate		

9. 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 strategic policy on Delivering Good Design states that “*Decisions on design matters will be informed by the principles set out in paragraph 1.6.5.*” Within the Environmental Sustainability paragraph it states that they are promoting a fabric first approach to house design. We believe that access to renewable energy on every new house would be as important.

The Sustainable Construction Principles (1.6.10) are very commendable & extremely important, although we wonder whether the DNP has the capacity to enforce & monitor the requirements of 1.7(2).2 a & b policy.

We heartily support such stringent policy desires, however we are concerned about the statement in 3.2.(2) “*All new housing should meet & not significantly exceed nationally described technical housing standards*”!! This policy statement effectively negates the earlier policies because the national standards are presently much lower than those that the DNP has stated that they wish to uphold.

It would also be helpful for the Plan to encourage residents to be able to improve the insulation & energy efficiency of their buildings.

Again, not having a clear & unequivocal policy on design & housing would seem inadequate to comply with National Planning Policy Framework in these areas:

- “*mitigating & adapting to climate change, including moving to a low carbon economy*” (NPPF paragraphs 7 & 8)
- Paragraph 148 which states “*The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk & coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability & improve resilience... & support renewable & low carbon energy & associated infrastructure*”
- Paragraph 149 states “*Plans should take a proactive approach to mitigating & adapting to climate change... policies should support appropriate measures to ensure the future resilience of communities & infrastructure to climate change impacts*”.

10. 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.

In 1.6.10 it would be helpful to require that building & insulation materials should also be of a high environmental standard too because many standard and frequently used building materials can be quite the opposite (but do not need to be).

We suggest that Good Design policy equally stresses the need for new builds to have access to renewable energy as well as have a very high insulation standard.

We suggest that policy 3.2.(2) is removed to avoid confusion.

In the extensions section 3.7(2) it would be helpful to stipulate the need for energy efficiency & insulation. It might be pertinent to adopt the Uttlesford principle – that a planning application can require energy efficiency improvements in another part of the building or another building altogether. In this way, homeowners wanting to build an extension were only allowed to do so if they did not increase the overall emissions of the whole building. (It means that energy efficiency measures must be made in the main building if the extension cannot be made zero-carbon.

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.

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

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

PART H - Additional Comment (6)

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

Paragraph (enter number, e.g. 4.5.1)	4.8(2)1c
Policy (enter number, e.g. 4.5)	4.8(2)
Policies Map	

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

	Yes	No
vii) Legally compliant		
viii) Sound		X
ix) Compliant with the Duty to co-operate		

15. 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 Local Plan states that telecommunications “*equipment does not cause substantial harm to the character & appearance of the built environment &/or the National Park’s Special Qualities, particularly landscape character, heritage significance & tranquillity*”

We feel that it should also say that it should also not harm wildlife, biodiversity or the health of the human population. This is particularly relevant for technologies such as 5G for which there has already been some concerning research about its potential harmfulness. We cannot risk adopting such unproven technology without there having been much research into the short & long term effects that it may have on people, insects & pollinators or other creatures.

This would be in line with the DNPs statement 2.3.2, which reflects the Government’s 25 Year Plan “*to take urgent & effective action to halt alarming global & national declines in biodiversity.*”

16. 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.

4.8 (2) 1 could have a further point:
 d) there will be no approval before conclusive positive research evidence has been confirmed about the safety of the technology & equipment in regards to people and wildlife has become available.

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.

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

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

Part I - Additional comment (7)

Biodiversity net gain – Strategic Policy 2.3 (2)

The inclusion of this policy is very much welcomed. This is an emerging area which is yet to be legislated for nationally, or fully tested in practice. Attention needs to be paid to how the biodiversity enhancements provided by new development will be maintained into the future. It is unclear how this policy will be enforced.

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

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