



NPA/21/006

## Dartmoor National Park Authority

5 February 2021

# Devon Climate Emergency Response Group Consultation on the Draft Carbon Plan – A Response by Dartmoor National Park Authority

Report of the Senior Policy Officer

**Recommendation: That the Members endorse the key elements of the consultation response and delegate authority to approve the final response to the Chief Executive (National Park Officer) in consultation with the Chair.**

## 1 Introduction

- 1.1 Dartmoor National Park Authority (DNPA) welcomes the opportunity to comment on the draft Devon Carbon Plan.
- 1.2 The draft Devon Carbon Plan is the culmination of over a year's work by the Devon Climate Emergency Response Group (DCERG). DCERG was convened following the widespread declaration of a climate emergency in early 2020. Partner organisations, including DNPA, public bodies, private sector organisations, environmental organisations and academic institutions, signed the Devon Climate Declaration which committed them to collaborate and engage with Devon's residents, businesses and visitors to develop and implement a plan to facilitate the reduction of Devon's emissions.
- 1.3 In 2020 DCERG invited a Net-Zero Task Force of fifteen specialists to create an evidence-led Devon Carbon Plan recommending a pathway to achieve net-zero emissions and the earliest credible date to do so. This first draft Devon Carbon Plan is the result of this ambition and has been produced following a call for evidence and a series of thematic hearings.

## 2 Status and Timeline

- 2.1 The draft Devon Carbon Plan is a partnership plan; implementation will be through the work programmes of individual partners, working together, to deliver the Plan's objectives and actions. The Plan is the most comprehensive local approach to achieve the UK's legally binding target of achieving carbon neutrality by 2050. It forms an evidence base for DNPA's plan-making and actions for the Authority to contribute to.

- 2.2 Following this consultation more controversial actions in the Plan will be deliberated at a Citizen's Assembly planned for 2021, subject to COVID restrictions. A final draft of the Plan will then be published and subject to a further consultation phase later in 2021.

### **3 Key Comments on the draft Devon Carbon Plan**

- 3.1 The Authority has set itself the ambition of being carbon neutral in its operations by 2025. The new Management Plan for the National Park (NPA/21/003) has climate change as a key cross-cutting theme and the Vision for Dartmoor in 2045 is:

*".. to make Dartmoor better for future generations, climate resilient, nature rich, beautiful, connected to the past and looking to the future: a place where people of all ages and backgrounds can live, work or visit"*

- 3.2 To achieve this vision we will need to embed our response to climate change in our way of life. This requires action at all levels: from the individual to international action.
- 3.3 The Devon Carbon Plan is to be welcomed as it provides a framework for co-ordinated action at a 'county' level and an alliance that can achieve positive change locally and also advance the case for changes needed at a 'higher' level. As such, the Devon Carbon Plan can help support delivery of the National Park Management Plan and vice versa.

### **National Park Purposes and Action to address Climate Change**

- 3.4 The evidence gathering stage for the Devon Carbon Plan highlighted some uncertainty from those who submitted evidence/participated around how landscape, and the objectives stated within landscape character assessment, should be reconciled with action to achieve net zero. The Authority does not see National Park designation as a restriction on achieving net zero: the National Park Management Plan is about how change is managed to enhance the National Park for future generations to enjoy. The revised National Park Management Plan (NPA/21/003) has a clear ambition for Dartmoor to be carbon negative (i.e. sequestrates more carbon than is released).
- 3.5 The Authority welcomes the statement in the draft Devon Carbon Plan that:

*"Whilst some have concerns about tensions between the changes which need to occur to achieve net-zero and protecting our landscapes, planning strategies and landscape character assessments can offer guidance on how landscapes can evolve in response to the demands of net-zero and the ecological crisis, but in ways that are sensitive to the character of the area."*  
(para 6.8)

### **Setting a date for achieving net carbon zero across Devon**

- 3.6 The draft Devon Carbon Plan sets out a roadmap for Devon to achieve net-zero carbon by 2050 at the latest, with an interim target of 50% reduction by 2030 below 2010 levels. The reason for this timeline is that reducing emissions is not something that can be achieved in local isolation – we are, in part, dependent on

national policy initiatives that set the regulatory and financial framework for climate action.

- 3.7 We believe that the draft Plan could be strengthened by undertaking some further analysis as some parts of Devon may need to achieve carbon neutrality or even be carbon negative before the 2050 deadline. For example, in order to offset emissions from urban areas, areas like Dartmoor may need to have achieved carbon negativity by 2050. This will require work with landowners, farmers and other managers and financial resource.

### **A Land Use Framework for priority setting across Devon**

- 3.8 A central ambition of the Devon Carbon Plan is to establish a Land Use Framework that can effectively plan for the changes needed to achieve net zero across all land use types in Devon. Identifying suitable areas for identified priorities, such as food production, tree planting, peatland restoration, energy generation, natural flood management and areas most likely to deliver multiple benefits.
- 3.9 DNPA supports the concept of a Land Use Framework, in particular where it can:
- effectively bring together existing competing planning frameworks;
  - plan for changes needed across all land uses, particularly those which do not currently benefit from strategic planning; and
  - coordinate priorities for all land use to achieve net zero.
- 3.10 To be effective the Land Use Framework will need to be developed in a collaborative manner (as with the draft Devon Carbon Plan). The scale of this task should not be underestimated and we agree with the statement in the draft Devon Carbon Plan that *“preparation of the Land Use Framework will need extensive stakeholder involvement and engagement”*.
- 3.11 The Authority is represented on the advisory group for the Land Use Framework and there is learning that we can share from the National Park Management Plan process.
- 3.12 It is not yet clear how the proposed Land Use Framework would relate to the Environmental Land Management system that is being developed by Defra, proposed Local Nature Recovery Strategies, proposed reforms to the planning system etc. Work on the Land Use Framework will also need to consider how it relates to existing strategies and plans that ‘govern’ development and allocation of resources for development.

### **Energy efficiency improvements in the built environment**

- 3.13 The Authority supports the draft Plan’s emphasis on improving the standard and efficiency of our building environment. Local Planning Authorities have limited ability to require improved energy efficiency in new development and no ability to control the efficiency of existing buildings. So it is welcomed that the Devon Carbon Plan is seeking to coordinate ambitious action across planning and building regulations and try to ensure this is supported by funding. DNPA agrees that to avoid costly retrofits of buildings currently under construction net zero homes should be pursued as soon as practically possible. However, the focus needs to be on all

buildings and, from a Dartmoor, perspective we need to be developing a 'net zero vernacular' that reflects the special qualities of the National Park.

- 3.14 The Authority is concerned that the draft Plan might be proposing a single solution to some actions. Specific consideration needs to be given to finding appropriate energy improvement measures for historic buildings which are consistent with their conservation. Historic England already provides quality advice from extensive research undertaken by themselves and organisations such as the Society for the Protection Ancient Buildings and other organisations. There is also a well-established industry providing appropriate materials and developing innovative approaches to improving energy efficiency in historic buildings, often using lime-based and natural materials, such as wood-fibre, hemp, and cork, which are inherently low-carbon. This work needs to be recognised in the Plan and supported to ensure historic buildings and their owners are properly equipped to meet the challenge of net-zero.

### **Reducing travel emissions**

- 3.15 DNPA appreciates reducing travel emissions is perhaps the hardest area to influence change. The Plan rightly highlights Devon's deeply rural-nature is not often conducive with viable mass-transport, whilst maintaining current transport behaviours but substituting fossil fuel with electric vehicles will not deliver net zero. Clearly there are no easy options for achieving net zero in this area. The approach of reducing the need to travel, supporting sustainable travel, and reducing emissions associated with essential travel is correct and supported.
- 3.16 The Plan sets out a role for planning in ensuring sufficient provision of local services to support residents of new development reduce their need to travel, this is supported. However, DNPA would also like to highlight that increasing internet sales and the decline of the high street continues to put significant pressure on local service retail and undermines the viability of small retail units. This simultaneously undermines the ability of planning authorities to require their provision in new development. Regulatory changes to the Use Class Order implemented in September 2020 also now make it more difficult for planning authorities to control these uses following development and ensure they continue to meet local community needs.
- 3.17 The transition to online retail needs greater attention in the Plan. Meeting daily needs from online purchases is now a reality for many. With online sales almost certain to grow, an approach for reducing travel emissions associated with online purchases seems an essential component of a carbon neutral future.
- 3.18 More work is required on the issue of transport emissions from visitors to Devon and Dartmoor.

### **Measuring progress/carbon accounting**

- 3.19 We believe that more work is required on how we measure progress towards the 2050 target and, specifically, how we account for carbon. Who owns carbon, who pays for and benefits from programmes such as peatland restoration, how you account for carbon – will be important questions to address as carbon markets start to emerge.

3.20 General comments on some of the other specific actions set out in the Plan are provided in the table below.

Action Number	Action	Comment
R4	Encourage the consumption of low carbon experiences, such as the arts, nature, education and social care, rather than material consumption.	The National Park Authority could reasonably be considered a delivery organisation for this action through its role promoting enjoyment and understanding of the National Park.
R23	“Anchor institutions” to embed social and environmental value further into tendering processes to effect meaningful change and sustainable procurement	This is welcomed and essential for both organisational carbon accounting and exerting pressure. DNPA is a member of the Devon and Cornwall Procurement Partnership and would welcome discussion on how this action could be pursued through collaboration
E1	Develop an energy strategy for Devon to deploy renewable energy generation.	This is supported and links with the Authority’s Climate Action Plan.
	Devon Climate Emergency partners to work with national government to request the reintroduction of support mechanisms for small-scale renewable electricity generation.	This is supported but experience demonstrates the need for a joined-up approach as there has, for example, been conflict between the desire to support small-scale hydro schemes, fishing and wider nature conservation interests.
B1	Expand whole house retrofit trials in Devon, such as Energiesprong, by working with social landlords to aggregate their housing stock and collectively procure retrofit, targeting houses most in need first.	DNPA would like to see retrofit trials also applied to historic buildings to showcase what can be done using conservation materials and techniques.
B8	Work in partnership with large energy users in the non-domestic sectors, including health and education, to share best practice in energy reduction.	DNPA queries whether National Park Authorities have the necessary specialism to assist with this action.
B10	Produce a regularly updated Devon-wide evidence base on the costs of developing net-zero carbon homes, incorporating examples already existing in the county, for use in Local Plan viability appraisals.	This is supported. However, DNPA would emphasise that the Future Homes Standard consultation proposes to improve building regulations standards to a level where current national planning policy would not allow local planning authorities to pursue Local Plan policies which sought to exceed Building Regulations. We are awaiting the Government response to

		this consultation, but this could undermine the need for local viability information to inform Local Plan policies.
T2	Promote development which will assist in relocalisation in all settings (rural through to urban), including mixed use development, development meeting local needs and creating opportunities to live, work and use services locally.	As a Local Planning Authority, DNPA would be well placed to assist with delivery of this action. Indeed this is currently a central theme of our emerging Local Plan.
T34	Develop an electric vehicle strategy to increase electric vehicle charging provision across Devon, including in key public spaces and workplaces, on street charging and plans to address the tourism sector.	This is supported and DNPA would be well placed to assist planning for roll-out in the National Park, particularly constrained by historic settlements with limited parking.
T35	Local Plans to ensure provision of Electric Vehicle charging points where parking spaces are provided in new developments	As a Local Planning Authority DNPA are well positioned to deliver this. Indeed DNPAs emerging Local Plan includes policy requiring provision of EVCPs alongside new development.
F2	Develop a Biodiversity Net-Gain Supplementary Planning Document that can be adopted by local planning authorities	As a Local Planning Authority DNPA would naturally be a partner organisation in the development of an SPD.
F8	Local Plans to incorporate policies based on the Welsh One Planet Development updated to reflect the imperatives of Net Zero.	DNPA's emerging Local Plan includes such a policy.

#### **4 Financial Implications**

- 4.1 To-date the Authority has contributed Officer time to the process of developing the draft Devon Carbon Plan. There is a separate and wider issue of how implementation of the final plan is resourced.

#### **5 Conclusion and Recommendations**

- 5.1 It is recommended that Members welcome the draft Devon Carbon Plan, consider the key comments outlined in Section 3, offer comments on these and authorise the Chief Executive (National Park Officer), in consultation with the Chair, to sign off the formal authority response.

Alex Gandy



NPA/21/007

## Dartmoor National Park Authority

5 February 2021

# Weight to be Attributed to Emerging Policies of the Dartmoor Local Plan 2018-2036

Report of the Head of Forward Planning and Economy

Recommendation: That Members Note the Content of the Report

## 1 Introduction

- 1.1 The Local Plan was submitted in September 2020 to the Secretary of State and an Inspector has been appointed to carry out the examination of the Local Plan. As a local plan is prepared, and moves closer to adoption, some of the policies in the plan may become relevant in decision making. The current development plan (the Core Strategy 2008 and the Development Management DPD 2013) remains the starting point for decision making, however over the coming months the emerging local plan will become more relevant to decision making as it proceeds through examination.
- 1.2 This document sets out how weight should be attributed to the emerging policies of the Dartmoor Local Plan 2018 – 2036 when determining planning applications. It is not a definitive assessment of policies which should or should not be used, but provides advice on what to take into account when making decisions during this transition period.

## 2. How is weight given to emerging Local Plan policy?

- 2.1 Paragraph 48 of the National Planning Policy Framework (NPPF)<sup>1</sup> states Local Planning Authorities may give weight to relevant policies in emerging local plans according to:
  - a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);and

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

## 2.2 **What stage is the Dartmoor Local Plan Review at?**

The Dartmoor Local Plan is considered to be at an advanced stage of preparation as it is currently in examination.

## 2.3 **What weight is to be given to each policy?**

The weight to be given to each policy in the Final Draft Local Plan needs to be established on a case by case basis, having regard to the advice in paragraph 48 of the NPPF (see above). A policy can be given significant weight if it has received no objections or where objections/comments are considered to be less significant. If there are objections, it is necessary to consider the nature of those objections and how they relate to the particular proposal. Some of the objections have regard to specific criteria and not to the principle and general approach of the policy, and therefore weight can be attributed to the policy having regard to how the criteria that has received an objection relates to the proposed development. In other cases the objector may have raised fundamental concerns with the policy, which are reinforced with evidence, and therefore it is necessary to consider those comments alongside overall compliance with the NPPF and the adopted Local Plan to help judge the weight that can be given to a particular emerging policy.

- 2.4 There is no precise methodology for determining the weight given to emerging policies, it will need to be determined on a case-by-case basis with reference to each comment. Full details of all representations on the Regulation 19 Local Plan are available in the Full Report of Representations published online<sup>2</sup>.

- 2.5 The table below provides an indication of the presence of objections received during the Final Draft Regulation 19 consultation in Plan order. It should be emphasised that this is only an indication and that we cannot pre-empt which issues the Inspector may subsequently raise during examination. Nor does this document take into account:

- a) the impact of any changes to national planning policy on the emerging Local Plan;
- b) any subsequent decisions DNPA may take regarding the significance of individual representations; or
- c) any evidence DNPA may utilise to endorse the policy approach in the Publication Draft Local Plan during the examination.
- d) the Matters, Issues and Questions (the key content of the examination hearings) which have been published by the Inspector

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<sup>2</sup> [https://www.dartmoor.gov.uk/\\_\\_data/assets/pdf\\_file/0025/348082/DNPA-LP-Reg19-reps-and-responses-by-section.pdf](https://www.dartmoor.gov.uk/__data/assets/pdf_file/0025/348082/DNPA-LP-Reg19-reps-and-responses-by-section.pdf)



### **3 An assessment of policy weight**

3.1 Three status types are used in the table, these are explained in more detail below:

**Objections of some significance:** Comments and/or objections have been submitted which if supported could affect how the policy is applied.

**Less significant comments/objections:** Some comments or objections have been submitted, but these may only be focussed on a small element of the policy or introductory text and, whilst important to address, are not considered to significantly affect the policy's application.

**No objection:** No comments of significance have been submitted.

Table 1. Levels of comments/objection by local plan policy

Policy	Status
<b>Vision, Spatial Strategy and Planning Applications</b>	
Strategic Policy 1.1(2) Delivering National Park purposes and protecting Dartmoor's Special Qualities	Less significant comments / objections
Strategic Policy 1.2 (2) Sustainable development in Dartmoor National Park	Objections of some significance
Strategic Policy 1.3 (2) Presumption in favour of sustainable development	Objections of some significance
Strategic Policy 1.4 (2) Spatial Strategy	Less significant comments / objections
Strategic Policy 1.5 (2) Major Development	Objections of some significance
Strategic Policy 1.6 (2) Delivering good design	Less significant comments / objections
Strategic Policy 1.7 (2) Sustainable construction	Objections of some significance
Policy 1.8 (2) Protecting local amenity in Dartmoor National Park	Objections of some significance
Policy 1.9 (2) Higher risk development and sites	Less significant comments / objections
<b>Environment</b>	
Strategic Policy 2.1(2) Protecting the character of Dartmoor's landscape	Less significant comments / objections
Strategic Policy 2.2 (2) Conserving and enhancing Dartmoor's biodiversity and geodiversity	Objections of some significance
Strategic Policy 2.3 (2) Biodiversity Net Gain	Objections of some significance
Strategic Policy 2.4 (2) Conserving and enhancing Dartmoor's moorland, heathland and woodland	Less significant comments / objections
Strategic Policy 2.5 (2) Protecting tranquillity and dark night skies	Objections of some significance
Strategic Policy 2.6 (2) Conserving and enhancing heritage assets	Less significant comments / objections
Strategic Policy 2.7 (2) Conservation of historic non-residential buildings in the open countryside	No objection
Policy 2.8 (2) Enabling Development	No objection
Policy 2.9 (2) The Water Environment and Flood risk	Less significant comments / objections
<b>Housing</b>	
Strategic Policy 3.1 (2) Meeting Housing Need in Dartmoor National Park	Objections of some significance
Strategic Policy 3.2 (2) Size and accessibility of new housing	Objections of some significance
Strategic Policy 3.3 (2) Housing in Local Centres	Objections of some significance

Strategic Policy 3.4 (2) Housing in Rural Settlements	Objections of some significance
Strategic Policy 3.5 (2) Housing in Villages and Hamlets	Objections of some significance
Policy 3.6 (2) Custom and Self-Build Housing	Objections of some significance
Policy 3.7(2) Residential alterations, extensions and outbuildings	Objections of some significance
Policy 3.8 (2) Replacement Homes	Objections of some significance
Policy 3.9 (2) Rural Workers' Housing	Objections of some significance
Policy 3.10 (2) Residential annexes to support farming	No objection
Policy 3.11 (2) Gypsy and Traveller Accommodation	Objections of some significance
Policy 3.12 (2) Low Impact Residential Development	Objections of some significance
<b>Communities, Services and Infrastructure</b>	
Strategic Policy 4.1 (2) Supporting community services and facilities	Less significant comments / objections
Strategic Policy 4.2(2) Supporting public open space and sports facilities	Objections of some significance
Policy 4.3 (2) Enabling sustainable transport	No objection
Policy 4.4 (2) Parking standards for new development	No objection
Policy 4.5 (2) Electric Vehicle Charging Points (EVCPs)	Less significant comments / objections
Policy 4.6 (2) Public car parks	No objection
Policy 4.7 (2) Signs and Advertisements	Less significant comments / objections
Policy 4.8 (2) Telecommunications Development	No objection
Strategic Policy 4.9 (2) The Access Network	Objections of some significance
<b>Economy</b>	
Strategic Policy 5.1 (2) Non-residential Business and Tourism Development	Less significant comments / objections
Strategic Policy 5.2 (2) Development affecting Town Centres	Objections of some significance
Strategic Policy 5.3 (2) Shops and other active uses	Objections of some significance
Policy 5.4 (2) Tourist accommodation	Less significant comments / objections
Policy 5.5 (2) Staff accommodation for serviced accommodation businesses	No objection
Policy 5.6 (2) Camping and touring caravan sites	Objections of some significance
Policy 5.7 (2) Agriculture, forestry and rural land-based enterprise development	Less significant comments / objections
Policy 5.8 (2) Farm diversification	No objection
Policy 5.9 (2) Equestrian development	No objection

<b>Minerals, Waste and Energy</b>	
Strategic Policy 6.1 (2) New or Extended Minerals Operations	<b>Objections of some significance</b>
Strategic Policy 6.2 (2) Minimising the Impact of Minerals Operations	<b>Objections of some significance</b>
Strategic Policy 6.3 (2) Minerals Safeguarding	<b>Objections of some significance</b>
Policy 6.4 (2) Waste Prevention	<b>No objection</b>
Policy 6.5 (2) Waste Disposal and Recycling Facilities	<b>No objection</b>
Policy 6.6 (2) Renewable energy development	<b>Objections of some significance</b>
Policy 7.1(2) Settlement Boundaries and Development Sites	<b>Objections of some significance</b>
Policy 7.2 (2) Community Planning	<b>Less significant comments / objections</b>
Policies Map	<b>Objections of some significance</b>

### **3.2 What effect will this have on planning applications?**

This is intended as an informal aid to assist those submitting and determining planning applications during this interim period. The full report on Regulation 19 Representations provides all responses to the Publication Draft Local Plan and we would advise that all representations to a policy should be considered before a policy is used in decision making. Furthermore, we would recommend that any applicant seeks pre-application advice prior to submitting a proposal which is reliant upon a policy approach in the Final Draft Local Plan.

## **4 Financial Implications**

- 4.1 This report is for noting and relates to advice around making planning decisions; it has no direct financial implications.

## **5 Conclusion**

- 5.1 This report advises that some elements of the emerging Local Plan may begin to now attract a degree of weight in decision making. Where a policy may be relevant to a decision during this period of transition, it would be appropriate to consider in more detail the specific comments relating to a policy, and in particular the degree that they may go to the heart of the policy, and soundness or consistency with national policy. This report is therefore intended not to be definitive as an assessment of the relative weight of each emerging policy, but to advise on the factors which should be taken into account in determining applications as the emerging Local Plan moves towards adoption.

Dan Janota