



CLIMATE CHANGE RELATED

RESPONSE TO PART 2 OF LOCAL PLAN CONSULTATION

prepared by ACT's Energy & Built Environment group

Section 1. Background/Context

The [current Local Plan \(LP\)](#) which runs 2013-2033, is being revised and extended to cover the period 2020-2040. [Par1](#), which " focuses on policies, was consulted on in 2020 but the result of this and any changes are as yet unpublished. This specifies the policies associated with new developments.

[Part 2](#) is being consulted on now, closing date is 9th August. The on-line consultation requires the user to select one of four areas to respond to:

* 1. Which Local Plan document would you like to comment on?



For the first of these, you need to pre-select a single site of which there over 100. Once there, the areas for comment are relatively limited and appear to ask for local knowledge against specific criteria.

The other three areas refer to specific documents/appendices listed on the consultation page. You can also write your comments in there. It is also possible to use the [downloadable response form](#) which is, either PDF text entry or printing and handwriting the response. It is also possible to respond by e-mail localplanreview@teignbridge.gov.uk. We are assured that all comments made in writing (on-line, e-mail or letter) will be considered.

Responding to this important consultation is not easy! The level of detail, constraint in areas of response and overall complexity of the material provided, makes it impossible for the vast majority of Teignbridge residents to respond in an appropriate way. Some of the suggestions made in the TDC consultation requests and associated publicity, suggests this is an exercise in gauging the degree of resistance to individual sites. Such responses can of course be dismissed by the planning authority and any subsequent examiner as they do not conform to pre-set criteria and evidence.

The following is an attempt to make the process a bit more accessible for those who want to respond in a more effective way.



Section 2. General advice

You do not need to follow all the detailed information provided here. However, it is important that as many people respond with as much effort/knowledge that they can.

- See ACT's <web post> on why everyone should respond.
- The most effective content of the response, in order of effectiveness (but also complexity) is:
 - Per site using the set criteria/information and conclusions provided (**option 1**). This should highlight inaccuracies/omissions on how these have been used/applied for each site. It could also include additional local knowledge that could promote/hinder private or community interest.

 - More general responses to the analysis of the criteria and approach to one or more of the consultation document **options**:
 2. Environmental/Sustainability assessments
 3. Habitat Regulation
 4. A more general Consultation Statement

 - General comments will still be useful, making sure they respond to the topics being consulted on. Unhelpful comments would be something like “no development”.



Section 3. Responding to Option 1 (site specific)

Consider the sites in your area and those you know well.

Read the information for these sites as summarised in [Chapter 4](#). These are generally repeated for most sites and are quite general, so it is difficult to interpret what they actually mean. You can still respond to some of these under one or more of the headings provided:

* 4. Please enter your comments below:

Natural Environment and Landscape	<input type="text"/>
Historic and Built Environment	<input type="text"/>
Land Use (including brownfield sites and agriculture)	<input type="text"/>
Housing (including affordable housing, custom homes, homes to rent)	<input type="text"/>
Health and Wellbeing	<input type="text"/>
Access, transport and connectivity	<input type="text"/>
Employment and economy, including town centres	<input type="text"/>
Infrastructure (including healthcare and education)	<input type="text"/>
Anything else	<input type="text"/>

You can read how TDC have [rated](#) each site and what [criteria](#) they used. These links are for a specific set of housing sites, and different appendices are available for other types of sites [here](#). You'll need to read the ones that apply to the site(s) you are commenting on.

Unfortunately, although Climate Mitigation, Low-Carbon and Carbon Neutral are mentioned, these are either undefined, poorly defined or wrongly interpreted. Nevertheless, there is significant per-site information on what Transport related criteria are used and how they have been applied.

If you are unable to read/interpret/comment on some of these from a Climate Change perspective, you may want to use the more general comments in the next section as a guide, if applicable to your chosen site(s).



Section 4. Responding to Option 2 (Environment/Sustainability)

If responding to specific sites is too onerous, it is possible to respond more generally to the [analysis of the criteria and approach](#) which address Climate Change related criteria/assessments. Here is a list of possible responses, note that these can be used as a guide for site specific response where these may apply:

1. New developments should be about meeting necessary and appropriate demand while minimising overall greenhouse gas emissions (Net-Zero by 2030, incl. embodied emissions). Delivering a pre-set number of housing units to maintain, or even stimulate, economic growth should NOT be the driver. There are more sustainable ways of doing this.

While housing numbers are outside the current control of planning authorities and the scope of this consultation, it is still an important point worth stating.

2. Many of us nowadays live in one or two-person households; this trend requires appropriately-sized dwellings, not predominantly 3–5-bedroom houses. If we build smaller units we of course lower the GHG emissions whilst still delivering the housing numbers required. The Plan could address this more effectively.

The plan suggests this has been done, [our analysis](#) shows significant improvements can still be achieved. In particular the planning authority should use [its powers](#) to specify the size and type of housing needed. There is little evidence that this power is sufficiently used to deliver on Climate mitigation.

Appropriately sized dwellings in line with an aging population and increasingly lower occupancy could result in 30% lower embodied emissions based on [our analysis](#). They would also result in a reduced land footprint, which could be as much as 50% on the current plans. Ongoing annual emissions and fewer sites will be some of the measurable benefits. Other social, wellbeing and environmental benefits could also be a consequence of such planning, while still meeting current government housing numbers.

3. Per-capita greenhouse gas emissions in Teignbridge are typically 30% lower in urban areas, this is true throughout the UK. Benefits of units within, or very close to, urban areas are clear. Provision of goods and services as well as travel can be minimised.

The consultation's comprehensive scenario analysis of this is very helpful. We also support the summary conclusions drawn. However, we are concerned that the SA ([Sustainability Appraisal](#)) Framework for Climate Change Mitigation is limited or inappropriate. For example:

- It includes "Air", which we interpret as air quality. This is not a Climate Change related criterion.
- While the topic of transport and Energy efficient buildings are mentioned, the latter is restricted to renewable generation. It ignores the higher priority of energy reduction as suggested by widely accepted Energy Hierarchy models.
- Without defining "low-carbon" generation in terms of Carbon Intensity, the criterion is open to interpretation.



- Apart from transport related criteria, there appears to be no assessment of the correlation between renewables (as defined in chapter 11) and individual site assessments.

Energy efficiency in buildings can be significantly improved by building appropriately sized housing units within single buildings. This suggests, where appropriate, but not exclusively, units should be located within, or very close to, urban areas. These must have good connectivity to minimise travel and emissions from utilities (heating and electricity).

4. Other important criteria for site selection/rating appear to be either absent or incorrectly applied.

These include:

- ability to provide higher levels of electricity supply for heating/transport decarbonisation;
- other infrastructure such as low-carbon transport especially public transport and walking/cycling must be present or provided as part of the development;
- air quality criteria and monitoring for some sites appears to be either inaccurate and/or out of date.



Section 5. Response to option 4 (General Consultation)

The following are general responses to some of the non-site specific consultation information. Please consider these in your own response.

5.1 Introduction (Chapter 1)

ACT welcomes the vision and objectives that are to underpin the new local plan for 2020-2040, in particular:

“Teignbridge will be a leader in tackling climate change and nurture an environment in...”

The last of six “robust assessment which looked at “The impact of new development on climate change.”

It would be wonderful if the new development plan’s outcomes don’t repeat the mistakes of the current plan. The words of the vision do not imply ‘business as usual’ with more urban sprawl of large unaffordable housing, resulting in more commuter-belt developments. We need radical solutions for major challenges!

5.2 Development Strategy (Chapter 2)

The government currently requires ~750 new homes per annum. Your assessment, given all the factors highlighted, for an additional ~7,300 homes, is sound. ACT of course do not support this level of house building on the grounds that:

- It flies in the face of the government’s legal obligations under the Paris accord on mitigating Climate Change. It is also incompatible with the local authority’s declared Climate Emergency.
- It does not in any way reflect actual local or even regional demand. It only serves to sustain an ever-expanding housing sector which has more to do with economic growth than the need for homes.
- The plan’s justification “The less affordable homes are, the more homes we are tasked with building.” could easily be achieved by building significantly more affordable homes to address the stated local needs, including:
 - An aging population, 1 in 3 will be over 65
 - More people living alone

Irrespective of the number of homes allocated by the current national formula, we broadly agree with the distribution of these sites based on the criteria set and scenarios analysed. We do not however believe that the limitations mentioned on use of brownfield sites has adequately considered the stated objectives/reasons. Nor does the allocation make full use of the powers available to the council to both deliver the numbers required and minimise the Climate and Ecological impacts.

Please refer to our response to our responses to the Strategic Environmental and Sustainability Appraisal.

It is encouraging to see that sites and measures are being considered to increase the availability of renewable energy and the reduction in energy consumption from building and transport. These are very important steps, but they do fall short of meeting the targets set by government and the councils own stated targets for the district.

ACT has already highlighted several of these shortfalls in its response to Part-1 policies, we are yet to see the outcomes from that consultation. The “Evidence Base” on this, from Exeter University, highlights many of these points, including embodied emissions. There is currently no account taken of the evidence provided. We therefore welcome discussions on how this evidence can be made use of when refining/finalising Part-1 & 2 of the new local plan.



5.3 Low Carbon (Chapter 11)

Specifically, we encourage you to start looking at [Chapter 11 \(Low Carbon\)](#) and the [associated supporting document](#) containing the analysis used. There is no requirement to respond to this in the current consultation. Instead, a more detailed consultation is expected later this year.

It is encouraging that TDCs are including this and the other Climate Change related information they intend to provide. ACT's Energy and Built Environment group has started assessing this information and will provide feedback to TDC over the next few months. If you are interested in being part of this conversation, please [contact us](#).