



ACT RESPONSE TO TEIGNBRIDGE LOCAL DEVELOPMENT PLAN 2020-2040 PART 1

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Section 1. Overview

We very much welcome the mention of Climate Change as the first statement in the Vision. Unfortunately, this seems to have been overlooked in the rest of the plan and its policies. For example, the diagram immediately after the Vision statement, **para 1.13**, refers to this as “Reducing Waste and Carbon Emissions” and another “Resilience to Climate Change”, i.e. coping with it.

At no stage is TDC’s Climate Emergency Declaration referred to as such in this plan. There are 4 references to a Climate Emergency, three of them in general terms and one in reference to DCC’s declaration/action Plan. As this is the only declared emergency we would expect to see it given much more emphasis.

Moreover, where there are policies to help mitigate Climate Change, these all have major caveats associated with them, unlike other policies where no emergency exists.

Based on this and the lack of any clear policy on how to avoid Runaway Climate Change, we can only conclude that this political declaration has been largely ignored.

District summary Note that the A30 is also a major through route.

Fig 3 Timetables The second row is labelled Local Plan part 1 (as row 1) – should this be Local Plan part 2?

Para 1.19 This states that “no policy can be read in isolation”. It goes on to list the other policies and any “material consideration” that will be taken into account when “making a planning decision”. This is a clear statement, suggesting that the Plan will not have to repeat related policies which may conflict or caveat certain other policies.

It is therefore perplexing why there are several examples where certain caveats or references to other policies is included. A developer is bound to assume that this has ‘special’ significance and can rightly argue that the presence or absence of certain other policy requirements is open to interpretation of priorities. It is very unfortunate that this technique is predominantly used to caveat Climate or Environmental policies in favour of new development. The one exception is the EU Habitat Directive.

We suggest the wholesale removal of such cross referencing and selective caveats. This would not only avoid uncertainty, but also improve readability of the Plan. If necessary, Para 1.19 could be reiterated at the start of each chapter to ensure this important point is not lost.

Useful Terms A number of terms are used to define policies, but these are not included in the list. Given their significance, they should be. These include:

Low-carbon power comes from processes or technologies that produce power with substantially lower amounts of carbon dioxide emissions than is emitted from conventional fossil fuel power generation. It includes low carbon power generation sources such as wind power, solar power, hydropower and nuclear power. The term largely excludes conventional fossil fuel plant sources, and is only used to describe a particular subset of operating fossil fuel power systems, specifically, those that are successfully coupled with a flue gas carbon capture and storage (CCS) system.

Net Zero Carbon and Carbon Neutral According to the IPCC these are defined as: Carbon neutrality means having a balance between emitting carbon and absorbing carbon from the atmosphere in **carbon sinks**. Removing carbon dioxide from the atmosphere and then storing it is known as carbon sequestration. In order to achieve net zero emissions, all worldwide greenhouse gas emissions will have to be counterbalanced by carbon sequestration.



Section 2. Sustainable Communities

2.1 SC1: Sustainable Development

While this policy largely reflects the NPPF and explains the balance that needs to be struck to achieve this objective, it does not give sufficient priority and emphasis to the declared Climate Emergency. The very definition of 'Sustainable Development' in the NPPF makes this abundantly clear, it includes the impact on "future generations".

Although a balance does need to be struck between Economic, Social and Environmental objectives, the council has only declared an emergency in one area, namely Climate Change. We have all now seen how addressing the current Covid-19 emergency can take priority over other objectives. Climate Change is likely to have even greater devastating impacts on both current and future generations.

It is unclear what the term "perform well" means, how it will be judged and by whom. This process needs to be as transparent and enforceable as possible. While we accept that some decisions will ultimately be taken by the council's Planning Committee, the planning process will inevitably be focused on certain policies or areas of priority/expertise. As Climate Change is the one Emergency already declared, this must be the focus throughout and be given the appropriate priority.

2.2 SC2: Settlement Limits and the Countryside

Having a clear definition of Settlement and Countryside is useful. Our main concern is the extent of exception sites listed in section 6 (Homes). This appears to allow relatively large numbers of homes to be developed (10's) yet several of the criteria listed here are not well defined. This makes it difficult for the planning process to make objective decisions, particularly as developments in the countryside tend to be incremental, i.e. development creep.

The permitted conversion of barns and other structures in the Countryside has become an established route for new housing developments. The combination of this and policies H6-8 make it even more critical to define objective criteria here.

2.3 SC3: Ashburton and Buckfastleigh

No comment

2.4 SC4: Neighbourhood Plans

No comment

2.5 SC5: Infrastructure

It is disappointing to see infrastructure requirements to mitigate and adapt to Climate Change not mentioned as a priority. Although some are referenced under transport and Energy in the supporting notes, these appear to be just the usual placeholders. Indeed, there is no mention of how funds are to be used in the section on Climate Change which allocates a "Carbon Offsetting Fund".

2.6 SC6: Viability

This is a welcome clarification of the regulatory requirements of the viability test on new developments. We understand the constraints within which the council is operating, however



we would encourage a bolder policy which allows the Climate Emergency declaration to be, at the very least, referred to as a possible exception.

This is very much the pivotal policy in which the council makes its position clear, either it intends to continue with setting financial/political viability ahead of its Climate Emergency statements, or it indicates its willingness to reverse this position. We would therefore expect to see caveats applied to new developments which put mitigation/adaption to Climate Change ahead of short-term financial consideration.

The impact of the pandemic should also be taken into account. This policy illustrates the difficulties in holding developers to account for their obligations. One of the grounds for a deviation is 'prolonged recession' which many economists believe we are about to experience as a result of the COVID-19 epidemic. The other grounds for deviation appear to be vague and subject to interpretation to suit the circumstances. In any case given a likely recession, all developments will potentially qualify for a deviation from policy requirements which is likely to result in measures to mitigate Climate Change being dropped in favour of cost cutting to achieve viability.

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Section 3. Climate Change

We welcome the approach taken in this revision of the Local Plan. It largely reflects the views expressed by ACT and the local community it represents. It is encouraging to see some specific and enforceable policy requirements, we'd encourage the council to include a few others we highlighted in our response to this section.

Para 3.1 Climate change “is” and “will” threaten how we live rather than “could”. The effects listed are only the “direct effects”, there are many indirect effects and consequences.

Para 3.3 The latest CCC Carbon Budgets and their modelling are likely to be updated to bring these in line with the UK's legal requirements under the Paris Climate Protocol. It should be highlighted that the current Carbon Budgets are inadequate and likely to be revised significantly downwards, so the Local Plan will be updated accordingly.

It should also be noted that the government's own figures are for territorial emissions only, so do not include net Carbon imports. Net imported emissions could account for an additional 30-50% .

Furthermore, the government now separates out territorial emissions from ‘bunker fuels’ for aviation and shipping these alone would add ~10% to territorial emissions. Bunker fuel emissions are territorial fuel supplies used outside the UK. Either all net traded Carbon emissions, or all territorial Carbon emissions are included in the overall figure. The current inconsistency results in substantial UK emissions not ‘owned’ by anyone.

Para 3.4 Was it not a Climate Emergency declaration? If so, why not state that? The DCC declaration is referred to as such.

Para 3.5 There is no doubt that policies tackling energy and Climate Change have wider medium to long-term economic and social benefits, so the word “can” should be omitted from the first line of this paragraph.

Para 3.6 As well as international and national decisions, local organisational and personal decisions will have a significant impact, probably of even greater impact.

Para 3.7 Box1 The government is committed to ensuring we remain “well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius”, rather than “as little as possible above 2°C”. This is in line with its commitment to the Paris climate agreement.

Why not have a table related to targets for Teignbridge. The Tyndall centre report recommends the following budgets:

Period	Recommended Carbon Budget (Mt CO ₂ e)
2018-2022	3.3
2023-2027	1.6
2028-2032	0.7
2033-2037	0.3
2038-2042	0.2
2043-2047	0.1
2048-2100	0.1

This is the maximum amount of CO₂ that should be emitted in each period, from energy only.

Para 3.8 and others There appears to be a confusion in the use of the terms “zero” and “low” with reference to “technologies”. It is unclear why there is a reference to this here.

Throughout this plan “technologies” sometimes refer to Primary Energy generation and sometimes to Energy consumption. The latter cannot be zero or low Carbon, it can only have



an efficiency rating on how it consumes Primary Energy. This is a critical distinction as without it some policies could be interpreted as supporting Gas Fired Powerplant, regarded by some as a 'low carbon technology'. Yet, the Carbon emissions for these are higher than grid electricity, so will increase overall emissions.

Para 3.9 We note that from OS maps that current tree area in Teignbridge is 12480ha. A 5% increase is 624ha. Assume a sequestration rate of 4.01 tonnes/ha/year then this sequesters 2.5kt of CO₂e. In 2017 LULUCF was -41.5kt. Overall, 2017 emissions were 772.69 kt. Our previous comments explored a 25% increase in tree cover, even that would only increase sequestration by 10kt per annum.

While 0.3% is a welcome contribution, it will only represent a small level of mitigation in Teignbridge's Carbon Emissions.

3.1 CC1: Resilience

Why is fossil fuel scarcity mentioned here? What is the evidence for there being a scarcity? If there were, then surely this would not be a bad thing to mitigate Climate Change? Is it meant to refer to minimising the impact of fossil fuel price increases? Possibly replace "Fossil fuel scarcity" with "elimination of fossil fuel use".

Measure c Refers to "energy contamination", what is this?

3.2 CC2: Carbon Statements

This is an excellent policy if our interpretation is correct. Given that this is the only concrete policy to address the council's Climate Emergency declaration, we very much expect it to remain intact when viability calculations are completed. Apart for the COVID19 pandemic, we are not aware of any other declared emergency, so we would expect a similar response to avert the impact of runaway Climate Change if we stay on our current trajectory.

The last para defines the meaning of "Carbon Neutral" developments, that is to eliminate, sequester or offset all regulated emissions. The second para of this policy states that that the policy seeks to "achieve Carbon reductions", this may be misleading as it does not state that the level of reduction expected is 100%.

We would also suggest that given the significance of the term "Carbon Neutral" and its use throughout, that its definition within the policy is placed in the list of terms used in the document.

Measure a The wording for transport "Reduce as far as feasible transport emissions associated with the development, depending on its location" is exceptionally vague and therefore open to arbitrary interpretation. Since this is not a regulated emission which can be verified, it should not be included. Instead reference to the other two transport related policies should suffice. For example, "Reduce as far as feasible transport emissions associated with the development" could be used.

Measure b iii) "Use of low carbon solutions where additional energy is required for building services such as heating, ventilation and air conditioning limiting use of natural gas;" Including natural gas in the same sentence is confusing. Would it be better to have a separate point – for the avoidance of doubt natural gas is not a low-carbon solution.

Measure c iii It seems odd to highlight these two in the policy statement rather than provide a more comprehensive list of possible 'future proofing' measures. We also question the inclusion of Vehicle to Grid as one of these measures since electricity flows in both directions, so if the capacity of the import is specified, then that is also the capacity of any export which is unlikely to be larger than the import. The [V to G catapult report](#) found that there were limited



circumstances where V to G could be cost effective, one condition is that the plug-in rate needs to be much higher than average, small-scale battery storage is more likely to be viable and is a more likely source of feeding into the grid. Could this be reworded to “Ensuring that the ability to install future solar PV and export to the grid is not precluded”?

Should electricity storage be included in the list of technologies that should not be precluded?

On-site Carbon reduction caveat In our previous response we suggested:

“Where it is not feasible or viable to deliver carbon reduction requirements on-site, methods such as off-site provision will be considered. This will need to be through a specific deliverable proposal or financial contributions to a potential future carbon offsetting fund.”

How will the carbon offsetting fund reduce GHG emissions and by how much? Why would it not be possible to deliver carbon reduction requirements on site?

Off-site measures contributing to an offsetting fund, this requires that a fund is set up for this purpose, who is to be responsible for this? How will the financial contribution be determined? We would suggest that any offset contribution is calculated on the basis of implementing an equivalent, verifiable, Carbon reduction within Teignbridge.

Para 3.16 Heat Pumps are a consumer of energy rather than a renewable energy source. When used in inappropriate buildings they can increase Carbon emissions. Similarly, District Heating systems in themselves are not inherently a source of renewable energy, rather an efficient method of delivering a primary source of heat energy, ideally a zero or low Carbon source.

Para 3.18 This seems to introduce a different term “Net Zero”, is this the same as “Carbon Neutral”?

Energy Hierarchy Off-setting is mentioned, but there is little information on how this is to be measured assessed and implemented. Offsetting is an essential tool at the start of decarbonising our Built Environment, ACT would welcome a discussion on how best to deliver an effective and balanced approach.

“In both cases, this will require ensuring a three phase electricity grid connection is provided to enable greater capacity, flexibility and two-way flows.” Mandating a 3 phase connection could compromise viability, see our comment under 3.25 for more detail. An on-site static battery should be considered to ensure that on-site use of electricity generated from PV is maximised. The statement “It is important that buildings are designed to be “PV and heat pump ready” so that an occupier can easily install PV panels or a heat pump without needing to make unreasonable or prohibitively expensive alterations to the fabric of the building or the electricity grid connection.

3.3 CC3: Electric Vehicle Infrastructure

Point b It is not clear what level of provision of charging points for developments with on highway parking is required. Is this also one per dwelling? What mechanism will be applied to ensure that these charging points are available to residents as opposed to the general public?

Point c We have previously questioned this; the 30% market share needs better definition, is it:

- % of new car registrations (from SMMT)
- % of all cars registered in Teignbridge
- % of all cars registered nationally (or Devon / South West)

Western Power’s Two Degrees scenario predicts that Plug-In Vehicleⁱ growth for Teignbridge will be as follows:

<https://actionclimateteignbridge.org/>

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Year	No. of PHEV	No. of BEV	All Plug-in vehicles	Registered vehicles (2018)	% of registered vehicles
2023	5150	2790	7940	94081	8.44%
2025	8635	5035	13670		14.53%
2028	14996	10818	25814		27.44%
2029	17172	13726	30898		32.84%
2030	19307	17228	36535		38.83%
2032	22953	26626	49579		52.70%

It is quite likely that sales of petrol, diesel and plug-in hybrids vehicles will be brought forward from 2035, in which case the above figures may underestimate market share. Visitors to the area requiring public charging should also be considered. To take account of visitors, it would be more reasonable to use national market share. The above forecast means that 30% market share could be hit about 2028-2029, which is about the time the next plan revision will come into force.

A problem with specifying 30% (or any number < 100%) is that in a period of rapid growth, many developments will have insufficient charging points within a few years of the development being completed.

Point e The policy mandates electric car charging points and says that it must be possible to fit a heat pump and PV without modification to electricity supply. Would it not be more appropriate to state what must be achieved rather than how? The how should be left to those delivering the technology, the role of the council will be to verify efficacy.

Point f Refers to including 2X fast (7 to 22kW) EV charging points. Is this 2 per application or 2 per site? The difference is that once 2 chargers are present further applications don't trigger a new charger. Considering the long charging times at petrol station with 7kW or 22 kW, is this really the right place for these?

3.25 Specifies that a 3 phase connection should be supplied in order to provide for greater capacity, flexibility and two-way flows. Since 2018 new charging points financed by OLEV (including for connection to a single phase supply) must be capable of being remotely controlled by the DSO, this is done by wireless means (SIM card or Wifi connection). 3-phase therefore is not necessary to provide flexibility. A 3-phase supply has significant cost (costs over £4K are not uncommon), so to specify a 3-phase supply in the local plan could affect viability. It is suggested that a 3-phase supply is removed in favour of the requirement to deliver electrification of transport and where appropriate heat to meet the net-Zero target.

3.4 CC4: Sustainable Transport

Policy impact assessment **provision h** specifies shared cars and bikes, as government is now consulting on micromobility vehicles, this should be worded to include these. We suggest:

Point h) provide car sharing parking spaces, bicycle and other vehicle sharing facilities.

There should probably be an explanatory note:

Government is currently running the future of transport regulatory review, and it is proposed that trials of electric scooters are started to reduce the need for public transport in the Covid-19 pandemic. It is not yet clear how these other innovative forms of transport might evolve,



but if these are shared they will need some dedicated area for docking.

3.5 CC5: Renewable and Low Carbon Energy

The caveats in this policy provide almost the same rights/preferences for non-renewable energy generating technologies. As there is no clear definition of what non-renewable and low-carbon energy generation technologies mean, almost anything is possible. It seems only Diesel is explicitly excluded in paragraph 3.32, natural gas should also be explicitly excluded.

It appears that this policy clearly sets energy consumption ahead of Carbon emissions. This goes against every statement made up to this point. If Climate Change is to be mitigated as stated, there can be no new development which increases overall emissions. Indeed, policies should aim to reduce emissions.

As offsetting is a necessary part of the effort to decarbonise, at least in the early stages, this policy should be worded accordingly. So the only caveat would be for a non-renewable energy generation technology (and includes low-carbon) to demonstrate that it can deliver a lower Carbon Intensity source than what it is replacing. ACT can provide government data for Carbon intensities of all primary energy generating technologies, these can then be used as a clear indicator of the contribution to Climate Change mitigation.

Para 3.29 States on-shore wind is constrained. The constraint essentially comes down to landscape value. On-shore wind is more needed as it tends to perform well in Winter. Sites with average wind speeds above 6metres/sec are viable for wind development – suitable sites in Teignbridge are on higher ground, particularly Dartmoor. In our previous comments we said:

“Solar on its own isn’t enough. The reason on-shore wind resource is constrained is landscape considerations, including a report done some time ago on the landscape impact of wind turbines. Some visualisation of turbines in the landscape should be undertaken, to see if turbines at sites with appropriate wind are acceptable. PV should be accompanied with some kind of longer-term storage, such as electrolysis to produce hydrogen which is stored in compressed form and then fed through a fuel cell to generate electricity when required.”

Para 3.32 Grid Balancing and increased EV charging are legitimate demands, however these cannot be allowed if the additional electricity generating technology is not low carbon or renewable. In particularly EV charging impact is a question of convenience, compared to Climate Change which is an emergency. EVs in themselves can contribute to a significant reduction in overall emissions from transport, but only if we maintain or reduce the grid’s Carbon Intensity. This must therefore be the key measure for any caveat to new electricity generating plant.

3.6 CC6: Energy Storage

Para 3.36 It may be useful to include other emerging electricity storage technologies so as not to exclude more efficient emerging ones.

For example, only Lithium-ion batteries and hydro-electric storage technologies are listed, yet flow batteries and Cryogenic storage are probably more cost effective.



Section 4. Design and Wellbeing

The policies in this section are quite comprehensive, hopefully they will be given the weight they deserve in assessing any new development. We have some general comments:

- The word “should” is used in the criteria for policy **DW14**, we believe “will” or “must” would be more appropriate, otherwise it is an optional policy and very likely to be ignored. Apart from one of the list of criteria/requirements, the majority qualify for being mandatory.
- Could Community Hubs together with other community amenities also be suggested, similar to enterprise hubs?
- Could planted boundaries be favoured over solid structures?
- We would expect to see development excluded from productive farmland. There doesn't seem to be any criteria on what land is allocated. How will Part 2 of the Local Plan be informed without these?

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Section 5. Economy

We recognise the considerable work which has underpinned revising this chapter, and welcome several of its policies. We are confining our comments to the overall theme and priorities of the chapter. We would like to see those change, with consequent effects on the policies, and would be very glad to work with the council to revise the latter.

Paragraph 5.1 lays out the overall theme of the chapter, stating that Teignbridge needs a strong, sustainable and resilient economy. We agree. It is important, however, to define the terms sustainable and resilient so that they reflect the council's net zero target, and widely agreed terms such as the UN Sustainable Development goals, so far as is possible within planning law.

We realise that the NPPF, while referring to the five guiding principles of sustainable development as laid out in the UK Sustainable Development Strategy, states that the NPPF as a whole represents the government's view of sustainable development. Nevertheless, paragraph 5.1 provides an opportunity to express the council's intent to deliver sustainable development according to the five guiding principles, so far as is possible within the law, and to reflect the need to meet the three sustainability objectives in Chapter 2 of the NPPF (economic, social & environmental) in mutually supportive ways.

This introductory paragraph can then be expanded to include the council's view of what a sustainable and resilient local economy can be, drawing on:

- Its net zero carbon target. This represents the key way in which the council can contribute to sustainability and resilience, since failure to achieve net zero emissions across the planet will have devastating consequences for humanity.
We understand that the council wishes the target to have primacy in all its planning, projects and decision-making so far as the law and financial constraints allow, and this should be reflected in the introduction. For example, the council could state that it will:
 - permit, in principle, developments which contribute to the target,
 - oppose, in principle, developments which reduce the likelihood of achieving the target, and
 - maximise support for, and facilitate approval of, proposals of types listed in the chapter, in all cases, so far as the law and resources allow.
- The UN Sustainable Development goals, which the UK government has committed to achieving.
- The UK Sustainable Development Strategy's five principles.

There is an additional reason for taking this approach now. Since the draft revised plan was written, the Covid-19 pandemic has changed the way the economy and society operate, and we will not return to the previous status quo. While there is a great deal of uncertainty around how the new economy will operate (and we are sure the council is planning to revisit its draft to take account of this), it does seem that many priorities have changed.

At the time of writing, the government is advising against the use of public transport, and advocating cycling and walking instead. Home-working has become a way of life for many. There are proposals for rapidly turning road space into cycling and pedestrian space.

At the same time, people are enduring a fundamental shock to their way of life which is unique in their lifetime. They may well be more willing than ever to see change which



mitigates an even more serious shock, that of climate disaster.

Having set out its stall, the introduction could then give examples of the kinds of development it would like to see, and those which it would not. The former could include those which:

- promote a regenerative, circular economy, designed to increase wellbeing
- fall within a green local jobs initiative, such as skills development in renewable energy installation and energy efficiency
- Promote biodiversity

Development which the council could state it would not like to see could include:

- Those which purport to only deliver economic growth, rather than growth in wellbeing. In this context, it should state that GDP is not the growth measure it prefers. Instead, it could promote either a wellbeing index, or, at the least, a truly green growth measure, which focused solely on activities which significantly contribute to the net zero goals. Those activities should also be shown to be sustainable and resilient.
- Those which increase net carbon emissions.

We have the following overarching comments on policies followed by specific comments on each policy.

- All policies should be reviewed to maximise their fit with the council's net zero 2025 target, within the constraints of the law, including the NPPF.
- In line with the above comment, references to "growth" should be reviewed, and either deleted, or replaced by a reference to "growth which contributes directly to achieve the net zero 2025 target", as appropriate.

5.1 EC1 Business Development

b) ii. Amend to read

"The standard of highways and road safety is appropriate, including that there is safe cycling and walking access from locations where most employees are likely to live"

Add b) iv. sustainability requirements are met;

Add b) v. there is no negative impact on the environment or on local biodiversity.

Para 5.2 Add at the end "taking into account at all times their impact on the environment and local welfare."

Add new paragraph 5.5 to describe the importance of safe cycle and walking access and how developers will be able and required to demonstrate it will be put in place.

5.2 EC2: Local Supporting Services for Employment Sites

Point b) replace "walking distance" with "walking or cycling" distance

Add point f) the development is carbon neutral and has no negative impact on the environment or quality of life in the locality.

Para 5.7 Amend first clause to read "Local services include cafes, takeaways, cycle hire and



repair,”

5.3 EC3: Loss of Employment Sites

Point a)ii) Replace “sustainable location” with “ location which enables the business to be more financially and environmentally sustainable, including increasing its contribution to the Council’s net zero 2025 target”

Point c) Amend to read “the proposed replacement use has significant financial sustainability or carbon reduction benefits which outweigh the loss of employment”

Para 5.8 amend second last line to read “justified in the context of the high importance of contributing to the net zero 2025 target”. Also amend last sentence to read “This is fundamental to the Local Plan’s objective of contributing to the net zero 2025 target.”

5.4 EC4: Inclusive Employment and Skills

First line Amend to read “To promote wider access to sustainable jobs which contribute to the net zero 2025 target and address skills shortages, particularly in energy efficiency, low carbon transport, locally produced food (particularly in small agricultural businesses) and locally produced products.”

Point a) First line delete “should” substitute “must”, third line delete “sought” substitute “required”, and add at end “focused on sustainable construction which contributes to the net zero 2025 target”.

Point b) Delete “encouraged” substitute “required”.

Para 5.9 last line delete “construction” substitute “low carbon construction”.

Para 5.10 Delete “growth” substitute “net zero carbon”

5.5 EC6: New Tourist Accommodation and Attractions

This policy may now need revision for the ‘new normal’ following the pandemic.

First line Insert after “sector,” “being one which is compatible with and contributes to the net zero 2025 target”.

2nd paragraph Add at the end “with negligible environmental impact”. Also inset provisions reflecting the need to support the transformation of the tourism industry to cater primarily to visitors arriving by, or travelling in the area using, low carbon transport, particularly cycles (including e-bikes), foot or electric vehicles.

Amend construction requirements to require zero carbon construction.

Point g) delete (duplication)

Para 5.15 Delete “sustainable expansion rather than inhibit its growth unnecessarily” and substitute “expansion which contributes to the net zero 2025 target”

after “accommodation” inset “which contributes to the net zero 2025 target”

5.6 EC7: Static and Touring Caravan Sites

Amend to require all proposals have provision for safe walking or cycling access and adequate



EV charging points.

5.7 EC10: Vital and Viable Town Centres

Amend to ensure that all development contributes to the net zero 2025 target

5.8 EC11: Large Scale Retail Development

Point c) Amend to read “The proposal will reduce travel and have facilities for cycle parking (including cargo bikes and those with trailers) and provide segregated cycling and walking routes from its reasonable catchment area[or similar phrase]”

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Section 6. Homes

This chapter covers policies around developments in rural areas, i.e. outside (and in addition to) those defined in Part 2 of the Plan covering major development sites. It is not clear how this impacts overall numbers or how the council hope to manage limiting housing supply to the minimum required by law or is considered necessary.

Some of the terms/concepts used in this chapter are referenced elsewhere in the document. So for example 'settlements' now have a more specific definition in chapter 2 Sustainable Communities, but these definitions can change when Part2 comes along. It is therefore difficult to comment on specific location, although it appears that the overall intention is to extend the areas where housing development can take place.

We have received several concerns from Parishes with respect to the widespread misuse of regulation around housing development in the open countryside. There is already a major problem of making Barn Conversion a permitted development. Some of the policies here open further loopholes which can be exploited by those who intend to develop Open Market Housing in the countryside. While we would support limited development for Affordable Homes and agricultural workers, these must come with temporary approval or long-term restriction on change of use.

Policies H1-5 cover affordable homes and self-build requirements, these are very reasonable with specific measurable criteria.

The remaining policies appear to be an attempt at covering every other possible development, extension or sub-division for developments adjacent to and existing 'settlement' or in open countryside. There are several concerns here despite the statement in SC2 on limiting development in open countryside.

The specific concerns are listed in responses to each policy below.

6.1 H1: Affordable Housing Targets

No comments.

6.2 H2: Affordable Housing Controls

No comments.

6.3 H3: Inclusive Design and Layout

No comments.

6.4 H4: Homes Suitable for All

Para 6.22 M4 regulations don't appear to state the same thing? See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

- M4(2) means Accessible and Adaptable dwellings
- M4(3) means Wheelchair accessible.
- M4(3a) refers to approach to the dwelling
- M4(3b) refers to Private entrances and spaces within the building.



Why separate % for 3a and 3b surely these are part of the same thing, the 2016 buildingⁱⁱ

6.5 H5: Custom and Self Build

No comments.

6.6 H6: Rural Exception Sites

Condition a And others in this section, use “proven” to define certain pre-requisites. This concept and process are not defined anywhere, so are open to subjective interpretation.

Condition b Uses the term Rural Settlement, this is not defined anywhere and could therefore mean any building in use.

Condition f Does include limitations on allowing Market Housing, but these are dependant on other undefined limitations which may or may not exist.

Condition g Allows up to 20 new houses per site, this seems a large number for an ‘exception site’ in open countryside. It is difficult to see how that number of primarily Affordable Homes could meet all the other requirements on environment, transport, employment in open countryside.

Condition h Requires “meaningful engagement”, given that this is undefined and subjective, would it not be more appropriate to have it in the supporting notes rather than part of a policy? It doesn’t even require community approval, just engagement.

6.7 H7: Entry Level Exception Sites

This policy appears to be identical to H6 except that it must be for 100% Affordable Homes, so no Market Housing allowed. It appears to limit these to being adjacent Settlements as defined in the Plan, but this could just be an oversight.

Condition e Allows the extent of this to be up to 1 Ha or 5% in size of the existing settlement. Although “size” is not defined, this could result in substantial developments on the edge of Settlements as 5% would represent 100’s of homes for some Settlements. It appears to go against having Settlement Boundaries.

6.8 H8: Local Needs Housing in Rural

This policy is similar to H6&7 but suggests it is restricted to Self-Build plots.

Condition b Introduces a number of undefined concepts such as “custom plot” and “qualifying local connection”, this makes it possible to build up to 9 units per plot and cumulatively up to 10% of the number of housing in the settlement. These are very large numbers!

Para 6.45 Suggests that this policy will help community land trusts and similar organisation, but the policy does not provide any preference for these over Market Housing for “custom plots”. The effect of this policy is likely to be that those who can afford it will extend Settlement Limits.

6.9 H9: Homes for the Travelling Community

No comments.

6.10 H10: Householder Development

Condition J Appears to be an afterthought, would that not apply anyway to any new



development of any size.

6.11 H11: Residential Amenity

No comments.

6.12 H12: Replacement Dwellings

Interesting that there are several conditions for improvements, but none on reduction in emissions. One can only hope that is because any new building needs to be Net Zero as defined elsewhere.

6.13 H13: Re-use and Conversion of Existing Buildings in the Countryside

This policy appears to allow any unused building of whatever state to be converted for residential or commercial use and rebuild accordingly.

Condition c Appears to allow for the curtilage to be extended with little or subjective constraints.

6.14 H14: Subdivision of Existing Dwellings

No comments.

6.15 H15: Rural Workers' Dwellings

Condition d Appears to reduce the limit of no sale of dwellings from 7 to 3 years. So that such Rural Worker Dwellings could be built and sold every 3 years when considering removal of conditions in H16.

6.16 H16: Removal of Conditions Imposed on Rural Workers' Dwellings

No comments.



Section 7. Environment

7.1 EN1: Strategic Open Breaks

No comments.

7.2 EN2: Undeveloped Coast

No comments.

7.3 EN3: Coastal Change Management Areas

Point a - i Under essential infrastructure include other possible sources of renewable energy, such as wave/tidal power and creation of lagoons.

7.4 EN4: Landscape Protection and Enhancement

Map on page 144 – there should be a link to a document that describes the landscape character of the different areas designations.

7.5 EN5: Equine Development

No comments.

7.6 EN6: Flood Risk

Points 1 and 2 state that developments should not be sited in Flood Zones 1 (low risk) and sets conditions for developments in Zones 2 and 3, only if there is no alternative available site in Flood Zone 1. The policy is adequate and clearly determines the steps that will be taken for development applications on Zones 2 and 3.

7.7 EN7: Air Quality Policy

Point 2- Harmful impact on air quality should be avoided and not mitigated. We should aim for a reduction of polluting traffic in inhabited areas. Can car free town centres in the area be considered and can the plan reflect this on guidelines for new developments?

It is now recognized that there is no safe level of particulates for human health, and that clean air is a basic human right, therefore given the poor air quality along some Teignbridge streets addressing this issue is of the highest priority.

In the study below (January 2020) the conclusion is that 'short-term exposure to PM_{2.5} was associated with an increased risk of 'out of hospital cardiac arrest' even at relatively low concentrations. Regulatory standards and targets need to incorporate the potential health gains from continual air quality improvement even in locations already meeting WHO standards.' That is, there is no safe level of air pollution exposure.

[https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(19\)30262-1/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(19)30262-1/fulltext)

This supports previous studies on air pollution and human health and more information can be found in The Lancet Commission on Pollution and Health (2017)

<https://www.thelancet.com/commissions/pollution-and-health>

Add a point 4 - Big developments have to contribute to an employment plan in the area so as to reduce commuting to other areas.

Add a point 5 – Teignbridge District Council will favour proposals of car free developments. Car sharing, public transport and parking zones would be created at specific area of the



development.

7.8 EN8: Light Pollution

Point b) Include a statement on lighting on areas around Greater Horseshoe bats roosts, linking it to EN14.

7.9 EN9: Contaminated Land/ Land Instability

No comments.

7.10 EN10: Biodiversity

Points 1 and 2 - Biodiversity and habitat connectivity

TDC should map and publish important wildlife corridors/habitat connectivity areas. Wildlife Corridors must include a mosaic of habitats to improve the diversity that the corridors provide.

Point 3 and 4– Net gain must be delivered in perpetuity and funded by developers and offset and net gain must be delivered before construction commences.

Net gain must be delivered via conservation bodies, local authority ranger services and approved providers.

7.11 EN11: Important Habitats and Features

Specific comment on the next parts.

7.12 EN12: Legally Protected and Priority Species

We welcome the inclusion of **S41 List of priority species**, and Devon Local Priority and Special Species on the list of species to be protected.

7.13 EN13: European Protected Wildlife Sites

The Exe Estuary SPA and Dawlish Warren SAC:

We recommend an additional Policy specifically addressing the Exe Estuary SPA and Dawlish Warren SAC. This would include bullet 4 from EN13 and:

No development shall be permitted on any land functionally-linked to the Exe Estuary SPA or Dawlish Warren SAC. TDC needs to map these areas.

No housing, tourist accommodation or tourist attraction development within 2km of the Exe and Warren - to reduce disturbance and habitat destruction.

The Council will encourage projects to extend the area of functionally-linked land in anticipation of the effects of global warming and sea-level rise.

Dartmoor SAC, South Dartmoor Woods SAC:

Include a point on potential recreational impacts on these sites from more housing in Teignbridge and that developers have to address that by funding recreational/ green spaces near the development site.

7.14 EN14: South Hams Special Area of Conservation

No development shall be permitted within 1km of Special Area of Conservation maternity roosts, except within an existing settlement boundary. Where part of the 1km zone is already



within a settlement boundary, or otherwise significantly developed, the no-development zone should be redrawn to include the same area as a 1km radius circle.

Where, following the securing of directly delivered mitigation of impacts on the South Hams SAC from developments within the Sustenance Zones or the Landscape Connectivity Zone, there remain residual or in-combination impacts, the Council may accept financial contributions towards delivery of strategic mitigation measures including: suitably located secure roosts, connectivity-enhancing hedges, and appropriately-managed foraging habitat.

Include in e:

Particular consideration will be paid to proposals within 1km of a designated roost as this area is crucial for foraging juveniles and for dispersal from the roost.

7.15 EN15: Trees, Hedges and Woodlands

Increasing tree cover will help tackle climate change through CO2 sequestration, improve air-quality, benefit people's mental well-being, and provide food, timber and fuel.

TDC will work to increase tree cover in both urban and rural areas by 5% within the life of the Plan, by:

Requiring new developments to deliver an appropriate amount of tree planting.

Work with local parishes to identify areas for tree planting.

Species planted should include fruit and nut trees, especially in urban areas, and a mix of locally occurring native species especially in rural areas. Where non-native and non-productive species are planted, wildlife-friendly species should be used.

Add a **Point 7** In most cases hedge translocation will be preferred over hedge removal followed by replanting.

7.16 EN16: Heritage Assets

Include a **point f**) Changes would be permitted to improve the energy efficiency of the buildings.

7.17 EN17: Conservation Areas

No comments.



Section 8. Appendix 2 : Building Design

Embedded renewables

“Generally better when mounted on rear roof slopes”

Solar panels need to be placed so that they capture the maximum solar radiation. Buildings should be oriented so that there is a south facing roof slope that can host solar panels. To state these must be at the back irrespective of orientation could lead to ineffective panels.

“Visually better when fitted flush to roof profile or in-built”

Built-in PV tiles (as shown in the illustration) are generally much less efficient than PV panels mounted on brackets above an existing roof. For roof mounted panels there needs to be an air gap between the roof and the panel to allow cooling of the panel, which increases its electrical efficiency.

“Panels and frames should match roof covering (normally grey or black)”

Black panels (monocrystalline) tend to have large silver conducting strips/diamonds which make them more visible. These are also generally more expensive because of the wasteful manufacturing process. Fitting of solar panels is often permitted development, so it would seem odd to restrict fitting to a new building, but then for this to be allowed after completion.

Solar panels can be obtained with painted or anodised frames, which can match both the panel and roof colour. <https://www.solar-trade.org.uk/wp-content/uploads/2016/10/CPRE-Solar-Design-High-res.pdf>

ⁱ <https://www.westernpower.co.uk/distribution-future-energy-scenarios-application>

ⁱⁱ

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf