



# **Non-Statutory Interim Climate Change Planning Policy Statement: Climate Emergency**

## **Statement of Public Participation**

**January 2023**

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## 1. Introduction

- 1.1 In September 2022, Mid Devon District Council (MDDC) approved a draft non-statutory interim policy statement on planning for the climate emergency for public consultation (hereafter referred to as the 'Planning Policy Statement').
- 1.2 The 'Planning Policy Statement' is intended to supplement relevant policies within the adopted Local Plan, where these are relevant to adapting to, and mitigating the impacts of, climate change through development in Mid Devon. It draws from current good practice, and relevant legislation and statutory provisions issued since the adopted Local Plan was prepared.
- 1.3 The 'Planning Policy Statement' will be applicable to all applications for the development and use of land and buildings in Mid Devon (outside the Dartmoor National Park) that are submitted to the Council for determination. Exemptions to the use of the 'Policy Statement' will include development that is subject to 'permitted development rights' where there is no need to apply for planning permission.

## 2. Statutory Duties

- 2.1 This Statement of Public Participation demonstrates how the Council has satisfied public engagement obligations in the local planning process. These are set out in the Statement of Community Involvement (SCI) adopted by the Council in August 2020.
- 2.2 The statement sets out:
  - The persons and organisations consulted by MDDC during the preparation of the 'Planning Policy Statement';
  - The comments received (in full / verbatim) raised by those persons or organisations; and
  - How those comments have been addressed in the 'Planning Policy Statement'.

## 3. Consultation and Engagement

- 3.1 The 'Planning Policy Statement' was published for consultation on Monday 24<sup>th</sup> October 2022, and was open for eight weeks, closing at 23:59hrs on Friday 16<sup>th</sup> November 2022. The consultation was promoted through a variety of methods, in compliance with the Council's Statement of Community Involvement; these are outlined below.
- 3.2 All consultees on the Council's Plan Mid Devon mailing list, as of Thursday 20<sup>th</sup> October 2022, were notified via post or email, and invited to make representations. The list includes relevant specific and general consultation bodies, parish and town councils within Mid Devon, residents or other persons carrying on business in the area who have requested to be kept informed. Lists of key consultees can be found within Appendix 1.
- 3.3 The following methods were used to notify consultees:
  - Letter or email to every person and organisation who appeared on the Plan Mid Devon database, as set out in Section 3.2 and Appendix 1
  - Information was made available on the Council website, which included a link to an online survey <https://www.middevon.gov.uk/residents/planning-policy/interim-climate-change-statement/>

- Information was made available on the Sustainable Mid Devon website <https://sustainablemiddevon.org.uk/events-and-news/climate-emergency-planning-policy-statement-consultation/>
- Press release
- 3 notification posts were made on Twitter (911 impressions, 28 engagements)
- 2 notification posts were made on Facebook (1,751 impressions, 66 engagements)
- 1 notification post was made on Nextdoor (5,254 impressions)
- Full documents were available to view at Mid Devon District Council, Phoenix House (main office) and all public libraries within the Mid Devon District (including the mobile library)
- Agents Forum held via Zoom on 4<sup>th</sup> November 2022, with 300 invitations issued via email

3.4 Consultation responses were invited:

- Through the use of an online survey
- By email directed to [fplan@middevon.gov.uk](mailto:fplan@middevon.gov.uk)
- By letter, sent to the Council's Phoenix House offices in Tiverton

## 4. Representations and Responses

4.1 A total of 18 separate individuals and organisations made representations, but not all participants completed every section of the survey. Questions 1 and 2 of the survey requested the name and address of the respondent and as such, answers have not been disclosed within this summary. The personal views of respondents were noted but a response to these has not been prepared. Representations received outside of the published consultation period do not form part of this summary.

4.2 Responses to points raised within each representation are addressed in turn within *Table 1*. A record of duly made representations has been published online.

## 5. Amendments to the Draft 'Planning Policy Statement'

The Council has considered all consultation responses received to the Non-Statutory Interim Planning Policy Statement: Climate Emergency. Amendments made to the 'Planning Policy Statement' which are also set out in the table below are expressed either in the conventional form of **strikethrough** for deletions and **underlining** for additions of text, or by specifying the modification in words in *italics*.

**Table 1. Representations and Responses to the Draft Non-Statutory Interim Planning Policy Statement: Climate Emergency Consultation**

No.	Organisation / Individual	Issues Raised	How these issues have been addressed						
01	Devon County Council	<p>Devon County Council welcomes the policy statement and would like to make the following comments relating to climate change, transportation, and flood risk.</p> <p><b>Climate Change</b> DCC has reviewed the policy statement in comparison to the actions set out within the Devon Carbon Plan. Comments are provided in the table below.</p> <table border="1" data-bbox="394 651 1267 1302"> <thead> <tr> <th data-bbox="394 651 831 687">Devon Carbon Plan Action</th> <th data-bbox="831 651 1267 687">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 687 831 1121">Development plans to demonstrate how they will shape places in ways that contribute to radical reductions in greenhouse gas emissions as a primary planning objective, including drawing on the principles of 20-minute neighbourhoods and One Planet Development.</td> <td data-bbox="831 687 1267 1121">CP2.2 states that local facilities should be accessible through walking/cycling within 800m of new developments. This goes further than the 20-minute neighbourhood principle. Whilst not explicitly mentioned, the checklist does a good job at beginning to bring focus onto the principles of One Planet Development.</td> </tr> <tr> <td data-bbox="394 1121 831 1302">Appraise the potential for low carbon heat networks in new development to make best use of existing heat producers</td> <td data-bbox="831 1121 1267 1302">May be potential to address this within the Policy Statement.</td> </tr> </tbody> </table>	Devon Carbon Plan Action	Comments	Development plans to demonstrate how they will shape places in ways that contribute to radical reductions in greenhouse gas emissions as a primary planning objective, including drawing on the principles of 20-minute neighbourhoods and One Planet Development.	CP2.2 states that local facilities should be accessible through walking/cycling within 800m of new developments. This goes further than the 20-minute neighbourhood principle. Whilst not explicitly mentioned, the checklist does a good job at beginning to bring focus onto the principles of One Planet Development.	Appraise the potential for low carbon heat networks in new development to make best use of existing heat producers	May be potential to address this within the Policy Statement.	<p>Support noted.</p> <p>Objective CP.3.3 'Using cleaner energy' has been revised to include the measure: <b><u>Inclusion of low carbon heat networks</u></b></p>
Devon Carbon Plan Action	Comments								
Development plans to demonstrate how they will shape places in ways that contribute to radical reductions in greenhouse gas emissions as a primary planning objective, including drawing on the principles of 20-minute neighbourhoods and One Planet Development.	CP2.2 states that local facilities should be accessible through walking/cycling within 800m of new developments. This goes further than the 20-minute neighbourhood principle. Whilst not explicitly mentioned, the checklist does a good job at beginning to bring focus onto the principles of One Planet Development.								
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		<p>Planning authorities to ensure vegetation, and the necessary arrangements for maintenance, is included within new development to aid building energy efficiency</p>	<p>CP4 and CP6 address this issue. Potential to enhance this by ensuring the necessary arrangements for maintenance into the future are considered.</p>	<p>Paragraph 4.88 of Policy DM26 ‘Green infrastructure in major development’ of the adopted Local Plan 2013-2033, justification states that ‘Development incorporating green infrastructure will be required to submit management and maintenance details for the proposed green infrastructure’. From November 2023, new development will be required to provide a minimum 10% net gain in biodiversity, for which a minimum 30-year management plan will need to be submitted. In the interim, the Council strongly encourages applicants to deliver 10% or more where feasible to do so.</p> <p>Noted, no action required.</p> <p>Noted, no action required.</p> <p>Support noted.</p> <p>The measure about road surfaces in Objective CP.3.2 ‘Using energy more efficiently ‘ has been amended as follows:  <del>Low carbon road surface options which are unlikely to be adopted by Devon County Council, e.g.</del>  <b><u>For roads which are unlikely to be adopted by Devon County Council, low carbon road surface options should be considered:</u></b></p>
<p>Local Plans to ensure new developments are designed with filtered permeability to promote sustainable travel.</p>	<p>CP2.2 Permeability and Walkability in the proposed checklist addresses this issue.</p>			
<p>Local Plans to require mobility hubs for new developments of appropriate size.</p>	<p>CP2.3 Integrated Active Travel in the proposed checklist addresses this issue.</p>			
<p>Local Plan reviews to implement zero-carbon buildings in operation and set embodied carbon targets as soon as possible where viable.</p>	<p>The Net-Zero Carbon Toolkit and the Net Zero Housing Assessment Tool make excellent progress at implementing this issue.</p> <p>We note that on page 21 it is suggested that Devon County Council will not accept low temperature asphalt or permeable paving. Yet Devon County Council routinely uses low temperature asphalt so that will</p>			

		<p>be accepted and should be encouraged.</p> <p><b>Transportation</b>  DCC fully supports the promotion of walking and cycling facilities in new developments. It would be beneficial for the document to make reference to the LTN1/20 cycle design guidance which suggests all routes should be: coherent, direct, safe, comfortable and attractive. Active Travel England will be a statutory consultee for larger planning applications going forward and if the cycle routes don't meet this criteria they may object. DCC also notes that if additional government funding is required for any walking and cycling routes, it must meet this guidance to secure funding.</p> <p>The best way to reduce carbon emissions for transport is to remove the need to travel. Therefore, making sure new developments have access to existing facilities by walking and cycling routes will be vital. Stating that facilities should be within 800m of the development is encouraged, however MDDC may want to consider defining what facilities this includes.</p> <p><b>Flood Risk</b>  DCC welcomes the inclusion of SuDS within the checklist, however advises that 'natural watercourses' should be removed from the SuDS section of the checklist to ensure that this is not misinterpreted as using a watercourse to store water (which may not be appropriate).</p>	<ul style="list-style-type: none"> <li>• Primary and secondary roads: low temperature asphalt</li> <li>• Tertiary roads: permeable paving</li> </ul> <p>A reference to LTN1/20 cycle design guidance has been added to CP.2.4 'Cycling':  <b>See LTN1/20 for cycle design guidance:</b>  <a href="https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120">https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120</a></p> <p>The measure about off-road cycle routes under Objective CP.2.4 'Cycling' has been amended as follows:  Green corridors, off-road cycle routes, <b>home zones, quiet lanes</b>, and public rights of way</p> <p>Policy S1 'Sustainable development priorities' of the adopted Local Plan 2013-2033, supports reducing the need to travel through the creation of sustainable communities with access to social, educational, recreational and cultural facilities and services. Key facilities that should be within 800m of new development can be defined through the preparation of the new Local Plan (Plan Mid Devon). These may include facilities such as shops, community buildings, healthcare services, infant and primary schools.</p> <p>The following changes have been made to page 35 of the Net Zero Carbon Toolkit:</p> <ul style="list-style-type: none"> <li>• <b>Devon County Council SuDS Guidance</b>  <a href="https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/">https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/</a></li> </ul>
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	<p>MDDC might want to consider adding further information to the toolkit. SuDS can be multifunctional, so it could be explored whether there are additional benefits of SuDS other than flood risk management. In addition, MDDC may also wish to assess whether SuDS should be planted and designed differently dependent on the location within the district. For example, an ecologist might want to encourage wetlands and ponds within areas known to have Great Crested Newts.</p>	<p><b><u>Surface water should be managed in accordance with guidance considered suitable at the time a planning application is being submitted.</u></b></p> <ul style="list-style-type: none"> <li>• Reducing flood risk through Sustainable Urban Drainage (SuDS) Changes to our climate are predicted to result in increased rainfall and greater risk of flooding. Integrating SuDS into a development can greatly improve the site’s ability to capture, absorb and effectively retain water as part of a comprehensive <b><u>and multifunctional</u></b> green infrastructure design. This <b><u>can</u></b> reduce surface water run-off and support local drainage networks to function effectively, to <b><i>reduce</i></b> the risk of flooding.</li> </ul> <p>The measures in Objective CP.5.1 ‘Sustainable urban drainage systems (SuDS)’ have been amended as follows:</p> <ul style="list-style-type: none"> <li>• SuDS such as rain gardens, swales, <b><del>natural water courses</del></b>, communal soakaways, filter strips, retention and detention basins</li> <li>• <b><u>Are there opportunities for making SuDS features multifunctional, e.g. incorporating play areas within dry detention basins, improving water quality, or linking with water reuse systems?</u></b></li> <li>• <b><u>Can you demonstrate how habitat creation could be included within SuDS features, and how this links to local ecology priorities?</u></b></li> </ul>
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02	Forestry Commission	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question.</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Throughout this consultation there is a mention of woodland and trees. We need to follow the principles of 'right tree, right place' that naturally complements the existing landscape character, meets the objectives of the project and is resilient to climate change and current and future pests and diseases. We need to ensure that any woodland that is created is done so in line with the UK Forestry Standards (UKFS). This is the reference standard for sustainable forest management in the UK and sets</p>	<p>No action required.</p> <p>Objective CP.6.2 ‘Creating and enhancing biodiversity’ has been revised to include the measure: <b><u>Planting of trees should respect the principle of ‘the right tree, in the right place, and for the right reason’. This principle should be adapted for all landscaping proposals</u></b></p>

	<p>out the approach to sustainable forest management, defines standards and requirements, and provides a basis for regulation and monitoring. You can view it here <a href="https://www.gov.uk/government/publications/the-uk-forestry-standard">https://www.gov.uk/government/publications/the-uk-forestry-standard</a></p> <p><b>Q5 Planning Applications Checklist Climate Principle 1:Sustainable development</b> Respondent skipped this question.</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Respondent skipped this question.</p> <p><b>Q7 Planning Applications Checklist Climate Principle3: Improving energy efficiency</b> 3.1 Where it states the use of vegetation for shade this could be 'vegetation and trees'. Trees are extremely good for shading and general protection of a development. Not only could the trees be planted to cool homes, cars and gardens, but they can also keep the surrounding infrastructure such as pavements and roads cool.</p> <p><b>Q8 Planning Applications Checklist Climate Principial 4: Adapting to higher temperatures</b> Respondent skipped this question.</p> <p><b>Q9 Planning Applications Checklist Climate Principle5: Mitigating floodrisk, and water resource resilience</b> 5.3 In this section it is worth mentioning tree planting to reduce rainfall flow and runoff. The tree canopy of leaves, branches and trunks slows down the rain before it hits the ground simply by getting in the way, this is called interception. The interception of rainfall by trees can spread the</p>	<p>No action required.</p> <p>No action required.</p> <p>The measure “Use of vegetation for shade in summer” in Objective CP.3.1 ‘Minimising energy consumption’ has been amended to include a reference to trees as follows : Use of <b>trees and</b> vegetation for shade in summer.</p> <p>No action required.</p> <p>The measure in Objective CP.5.3 ‘Reducing the risk of flooding’ has been amended to the following: <b>Inclusion of N</b>nature-based solutions, <b>riparian or flood tolerant tree and vegetation planting, natural vegetation of</b></p>
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	<p>effect of a rainstorm over a longer time period. This allows some of the water (studies suggest up to 30%) to evaporate back into the atmosphere directly from the canopy without ever reaching the ground. Trees could also help prevent run-off up to 80% in urban areas compared with asphalt.</p> <p>Tree planting could be used directly by the scheme to reduce runoff or if the development is at the bottom of a catchment prone to flooding, trees/woodland could be planted upstream to reduce the risk whether it be through woodland creation on the floodplain, or on steep valley sides or riparian trees. This could all help to reduce the speed and amount of runoff, reducing the risk of flooding. You can find some helpful information here;  <a href="https://www.forestresearch.gov.uk/publications/designing-and-managing-forests-and-woodlands-to-reduce-flood-risk/">https://www.forestresearch.gov.uk/publications/designing-and-managing-forests-and-woodlands-to-reduce-flood-risk/</a></p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b></p> <p>6.1 Well designed and managed woodlands protect soil and can act as a trap or sink for contaminants. Riparian woodland in particular acts as a buffer and intercepts sediments, nutrients and pesticides that may be draining from neighbouring land. This may help in achieving nutrient neutrality in those areas with high nitrates or phosphates.</p> <p>Protection of existing trees has been included but it is specifically ancient woodland and veteran trees that need to be protected. If there are any ancient woodland or veteran trees on or near a proposed development site then Natural England and Forestry Commission should be contacted for advice. Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. Ancient and veteran trees can be individual trees or groups of trees within wood pastures, historic</p>	<p><b>habitats, e.g. green/brown/blue roofs, communal basins <u>and or</u> ponds, green spaces within blocks, <u>and/or</u> green verges <u>to retain rainfall and reduce surface water runoff</u></b></p> <p>Guidance noted.</p> <p>Two measures in Objective CP.6.1 'Protecting existing Natural Capital and biodiversity' have been amended as follows:</p> <ul style="list-style-type: none"> <li>• Avoidance and mitigation measures, <b><u>e.g. nature based solutions or mechanical filtration systems</u></b>, for <b><u>other</u></b> pollution of <b><u>other</u></b> landscapes, soils, ecosystems, and water. <b><u>These could be from chemicals or activities</u></b> such as nitrates, transport, agriculture or industrial emissions</li> <li>• Protection of existing trees (<b><u>with particular regard to ancient trees and woodland, and veteran trees</u></b>), <b><u>mature</u></b> hedges and hedgerows during site preparation, demolition and/or construction works (for ecological value, carbon sequestration and amenity value). <b><u>A minimum 5-metre buffer zone should be preserved</u></b></li> </ul>
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	<p>parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats.</p> <p>The National Planning Policy Framework states that: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. The Forestry Commission is a non-statutory consultee on any development affecting or within 500m of ancient woodland. More information can be found here <a href="https://www.gov.uk/guidance/planning-applications-affectingtrees-and-woodland">https://www.gov.uk/guidance/planning-applications-affectingtrees-and-woodland</a></p> <p>6.3 Linear woodland could be used to support green infrastructure, and this could be linked to sustainable transport such as cycling lanes. The linear woodland could run the length of the cycle path connecting habitats and increasing biodiversity, providing shading and weather protection and also reducing the amount of rainfall due to interception explained previously.</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>Throughout the tool various materials including timber and wood have been referenced. Using wood for infrastructure is a great way of locking up carbon as 50% of the dry weight of wood is carbon. It can also be used as a sustainable building material and a great substitute for energy-intensive materials such as concrete and steel. Timber requires less processing than many other materials and is a great way to absorb carbon as the timber establishes. We import much of our wood for development from abroad as far as the USA and the carbon footprint of shipping and delivering this wood is extremely high. If we could start to grow local</p>	<p><b><u>between development and retained hedgerows, which should not be utilised as residential boundary treatments</u></b></p> <p>Guidance noted. Policy DM28 'Other protected sites' of the adopted Local Plan 2013-2033 seeks to protect an area of more than 8 sq.km of ancient trees and ancient woodland in Mid Devon from adverse impacts from development.</p> <p>Noted. Objective CP.2.4 'Cycling' includes a reference to 'green corridors', which implies a linear form but does not specify the surrounding plant material.</p> <p>National planning policy requires that the economic and other benefits of trees and woodland should be recognised in planning policies and within decision-making.</p> <p>Policy S1 'Sustainable development priorities' of the adopted Local Plan 2013-2033 expects all development to be energy efficient and to support a low carbon future.</p>
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		<p>timber that could be used for construction, then this would certainly help the UK to meet targets for both woodland creation and for greenhouse gas emissions reduction targets. The construction industry can help to re-start timber production by helping to create the market for locally sourced wood products. The UK is currently the second largest net importer of timber in the world because of our historic deforestation, this is being reversed slowly but we remain with one of the lowest canopy covers in Europe and much of our newly planted woodland is left unmanaged.</p> <p>Page 34 Considering the wider sustainability picture I would suggest the inclusion of landscaping with trees are considered. Not only do they absorb and store carbon which enable us to reach our net zero targets they also provide shading/cooling, protection, improve water quality, reduce rainfall amounts through interception and slow runoff rates helping to reduce flooding. They also help to improve air and water quality, increase biodiversity and create beautiful recreational spaces for people to enjoy which is good for their physical and mental health and wellbeing.</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question.</p> <p><b>Q13 General Comments</b> Respondent skipped this question.</p>	<p>The place of sustainable materials and methods of construction in achieving net zero carbon will be taken into account during the plan-making stage of the new Local Plan (Plan Mid Devon), and will underpin new policies.</p> <p>Policy DM26 ‘Green infrastructure in major development’ of the adopted Local Plan 2013-2033 requires the inclusion of new green infrastructure, such as native woodland, to be incorporated within proposals for major development.</p> <p>Natural materials such as timber are prioritised within the materials hierarchy of the Net Zero Carbon Toolkit.</p> <p>No action required.</p> <p>No action required.</p>
03	Historic England	<p>The importance, and urgency, of encouraging an appropriate planning response to our climate emergency as articulated in your statement is acknowledged.</p>	

		<p>From a heritage perspective, in addition you may wish to emphasise the value of retaining, repairing, reusing, refurbishing and retrofitting existing buildings in helping to meet the Government’s net zero carbon target, taking into account their embodied carbon.</p> <p>Historic England believes that energy efficiency, sustainable technology and reducing carbon emissions are compatible with the conservation of our heritage and indeed <a href="#">research</a> has indicated that we can reduce the carbon emissions of historic buildings by over 60% by 2050 if we take a whole of life carbon approach.</p> <p>To help we offer information and advice on many related topics including renewable energy generation, energy efficiency and historic buildings and traditional homes, energy performance regulations, to advise on how this can be undertaken while minimising negative impacts on the historic environment. Thank you for referring to several of these publications.</p> <p>In the section of the Toolkit relating to the potential permissions, it may be helpful to mention Listed Building Consent and perhaps how proposals need to be considered.</p>	<p>Objective CP.3.1 ‘Minimising energy consumption’ makes reference to the ‘incorporation of existing structures into new development’ and that ‘opportunities for repurposed buildings and structures [should be] prioritised over new construction’</p> <p>Noted. Two measures under Objective CP.3.1 ‘Minimising energy consumption’, which relate to reclaiming and repurposing materials and structures have been updated to include the following guidance:</p> <p><b><u>*For development proposals affecting Historic Buildings, relevant guidance has been prepared by Historic England:</u></b></p> <p><a href="#">Retrofit and Energy Efficiency in Historic Buildings   Historic England</a></p> <p><b><u>This guidance includes “Energy Efficiency and Traditional Homes” (July 2020), “Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency” and other links and resources</u></b></p> <p>Page 47 of the Net Zero Carbon Toolkit has been amended as follows:  Upgrading or installing replacement double/triple glazed windows (subject to planning officer support) can reduce heat loss by up to 40%. Recent advances in window technology such as evacuated glazing offer the possibility of recreating traditional window forms but with only a fraction of the heat loss. <del>This technique can in some cases be applied to listed buildings.</del> Emerging products such as insulating plasters also offer the opportunity to insulate walls in a</p>
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			sensitive manner. <b><u>For Listed Buildings, check first with your local authority Conservation Officer whether Listed Building Consent is needed for what is proposed (and how to apply).</u></b>
04	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes development of the policy statement and the Council’s commitment to ensure climate change is addressed in planning decisions. Innovation on measures to combat and adapt to climate change is an ever evolving and fast-moving field.</p> <p>We therefore commend the Council’s positive approach to address this complex issue. Our comments on the emerging guidance put forward in the consultation document are set out below.</p> <p><b>Planning Applications Checklist</b></p> <p>Natural England is pleased to note that the checklist demonstrates awareness that the natural environment can play a vital role in mitigating the climate crisis and achieving net zero, as healthy ecosystems can take up and store a significant amount of carbon in soils, sediments and vegetation.</p> <p>Natural England also welcomes that the adaptation measures identified in the checklist recognise the value of nature-based solutions for delivering multifunctional benefits to people and wildlife – through the protection and enhancement of tree cover; the provision of sustainable drainage features and natural flood management; the provision of net gains for biodiversity; and the provision of green infrastructure features.</p>	<p>Support noted.</p> <p>A new measure has been included under Objective CP.6.1 ‘Protecting existing Natural Capital and biodiversity’:  <b><u>Protection of soil from erosion and compaction, inappropriate planting*, avoidance of unnecessary digging or mixing of soils, or surface sealing (for carbon and water storage, as a biodiversity reservoir, and as a buffer against pollution)</u></b>  * <b><u>Reference:</u></b>  <b><u><a href="https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england">https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england</a></u></b></p>

	<p>Natural England has the following comments to make and advice to give on the content of the checklist which we hope will be of use to you as you finalise the policy statement:</p> <ul style="list-style-type: none"> <li>- Objective 6.1 includes measures to support the protection of existing trees, hedges, and hedgerows, and Objective 6.2 requires the restoration of or planting of new trees, hedges, and hedgerows. Whilst tree planting offers one of the biggest opportunities for carbon storage and sequestration there are many other habitats that also contribute. The <a href="#">Carbon Storage by Habitat</a> report provides detailed information on carbon storage and sequestration by different habitat type.</li> <li>- Soil is an essential natural capital asset that provides important ecosystem services, including as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. Objective 6.1 would be strengthened if it included a requirement to protect soils.</li> <li>- Objective 6.3 identifies the creation of pocket parks as a measure for consideration, it is also important to consider the protection and enhancement of existing green spaces.</li> <li>- Natural England, with the Forestry Commission and Forest Research, have published <a href="#">guidance</a> for the protection of peat that provides a decision framework for landowners on where (and where not) to establish woodland.</li> <li>- The <a href="#">Natural Capital Atlas Mapping Indicators</a> for <a href="#">Devon</a> maps the state of our natural capital in terms of its quantity, quality and location, which can be useful when considering the availability of ecosystem services for climate regulation.</li> <li>- The <a href="#">Climate Change Adaptation Manual</a> provides extensive information</li> </ul>	<p>A new objective (CP.6.4 ‘Carbon storage’) has been included under Principle CP.6 ‘Resilience of natural systems and resources’:</p> <p><b>CP.6.4 Carbon Storage</b>  <b><u>Landscaping proposals to consider different habitat types for carbon storage and sequestration.</u></b>  <b><u>Reference: Natural England (2021) Carbon Storage and Sequestration by Habitat</u></b>  <b><u><a href="http://publications.naturalengland.org.uk/publication/5419124441481216">http://publications.naturalengland.org.uk/publication/5419124441481216</a></u></b>  <b><u>Environmental Benefits from Nature Tool</u></b>  <b><u><a href="http://publications.naturalengland.org.uk/publication/6414097026646016">http://publications.naturalengland.org.uk/publication/6414097026646016</a></u></b></p> <p>A new measure has been included under Objective CP.6.3 ‘Nature recovery and wildlife networks’:  <b><u>Creation of ecological networks throughout the development for the benefit of both nature and the community</u></b></p> <p>A measure in Objective CP.6.3 has been amended as follows:  <b><u>Proximity to n</u></b><del>ature recovery areas and networks</del> <b><u>should be identified, protected and enhanced</u></b></p> <p>Measures in Objective CP.6.2 ‘Creating and enhancing biodiversity’ have been amended as follows:</p> <ul style="list-style-type: none"> <li>• Planting of <del>native or non-intrusive species for pollinators and other insects</del> <b><u>a diversity of native species, or species which are proven to attract wildlife</u></b></li> <li>• <del>Inclusion of o</del>One or more: bird boxes, bat boxes/bricks <b><u>per dwelling or employment unit. Additional features such as</u></b> amphibian kerbs, hibernacula, hedgehog</li> </ul>
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	<p>on climate change adaptation for the natural environment. It includes the Landscape Scale Climate Change Assessment Method that can help people through an assessment of the impacts and vulnerabilities of their natural environment features and the adaptation they can plan. There are sections on habitats, species, green infrastructure, access and recreation and geology and geomorphology.</p> <p>- Natural England is developing a tool that can measure the multi-functional benefits of green spaces within developments. The <a href="#">Environmental Benefits from Nature Tool (Beta Test Version)</a> can be used on a site to calculate Carbon storage based on habitats present. The Tool is also still in development but is designed as a voluntary add-on to the Biodiversity Metric Tool.</p> <p>The tool has been developed by Natural England and the University of Oxford in partnership with Defra, the Forestry Commission and the Environment Agency to support Government’s 25 Year Environment Plan commitment to expand net gain approaches to include wider Natural Capital benefits such as flood protection, recreation and improved water and air quality.</p> <p>- Natural England is also developing the <a href="#">Green Infrastructure Framework – Principles and Standards for England</a> to support the greening of our towns and cities. The Framework is a commitment from the Government’s 25 Year Environment Plan and will help local planning authorities to assess the quality of green infrastructure in new developments. At present the GI Principles and the Mapping Tool are available but following the launch of the full GI Framework later in the year LPAs will also have access to the GI Standards, the GI Design Guide, and a selection of case studies and process journeys.</p>	<p>holes/highways, wildlife-friendly/accessible ponds or other water features <b><u>should also be incorporated into development</u></b></p> <p>Two new measures have been included under Objective CP.5.1 ‘Sustainable urban drainage systems (SuDS)’ as follows:</p> <ul style="list-style-type: none"> <li>• <b><u>Can you demonstrate how habitat creation could be included within SuDS features, and how this links to local ecology priorities?</u></b></li> <li>• <b><u>Are there opportunities for making SuDS features multifunctional, e.g. incorporating play areas within dry detention basins, improving water quality, or linking with water reuse systems?</u></b></li> </ul> <p>A new measure has been included under Objective CP.6.3 ‘Nature recovery and wildlife networks’: <b><u>Protection or enhancement of existing green space</u></b></p> <p>A new objective (CP.6.4 ‘Carbon storage’) has been included under Principle CP.6 ‘Resilience of natural systems and resources’: <b><u>CP.6.4 Carbon storage</u></b> <b><u>Landscaping proposals to consider different habitat types for carbon storage and sequestration</u></b> <b><u>Reference: Natural England (2021) Carbon Storage and Sequestration by Habitat</u></b> <b><u><a href="http://publications.naturalengland.org.uk/publication/5419124441481216">http://publications.naturalengland.org.uk/publication/5419124441481216</a></u></b> <b><u>Environmental Benefits from Nature Tool</u></b> <b><u><a href="http://publications.naturalengland.org.uk/publication/6414097026646016">http://publications.naturalengland.org.uk/publication/6414097026646016</a></u></b></p>
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			Guidance noted.
05	National Highways	<p>As you may be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which at Cullompton includes Junction 28 of the M5 approximately 800m north east of the town centre. It is on the basis of these responsibilities that the following comments have been made.</p> <p>The Interim Planning Policy Statement is relevant to development and use of land and buildings in Mid Devon in relation to climate change considerations, and applicants should have regard to its principles and objectives and evidence how these have been considered and used in planning applications. The Interim Statement is supported by a Climate Emergency – Planning Applications Checklist for all development proposals, a Net Zero Carbon Toolkit and the MDDC Net Zero Housing Assessment Tool.</p> <p>Principle CP.2 ‘Increasing accessibility, reducing the need to travel, and efficient movement of goods’ of the Planning Applications Checklist sets out measures to support the creation sustainable and connected places that reduce the need to travel and seek to change travel behaviours especially for shorter trips. National Highways strongly supports measures which aim to enhance and promote sustainable transport opportunities and ensure that places are well connected to reduce the reliance on the private car. This in turn supports the SRN in fulfilling its strategic function of enabling the long distance movement of people and goods and makes a significant contribution to enabling and sustaining economic growth, prosperity and productivity, while also contributing to wider sustainability objectives and improved accessibility to key economic and social services.</p>	Support noted.

		<p>This strategic function is unlikely to change and we therefore need to ensure, and where necessary safeguard our network so that it continues to be fit for purpose now and into the future. Whilst recognising the value of sustainable transport measures, these do not negate the need for, or importance of, highways schemes that may be identified as necessary to enable planned growth to come forward or address existing safety or capacity constraints.</p>	
06	Holcombe Rogus Parish Council	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b>          Holcombe Rogus Parish Council welcomes the interim policy statement. The purpose and intention of this interim planning policy statement demonstrates the leadership required in the climate emergency and supports the endeavor for Devon Council to reach net zero 2030.</p> <p>HPRC would welcome clarity that this is applicable to all applications for development, and not just major developments noted in section 4.1</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b>          this list is comprehensive and meets all expectations</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b>          Welcome this principle. No further comment</p>	<p>Noted.</p> <p>The 'Planning Policy Statement' applies to all scales and types of development, except the small area of the district which falls within Dartmoor National Park, or development that is subject to 'permitted development rights' where there is no requirement to apply for planning permission.</p> <p>Support noted.</p> <p>Support noted.</p>

	<p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Welcome this principle. No further comment</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> Welcome this principle and ask that for section 3.2 that Mid Devon provide guidance as the expected operational standards of the development and an indicative limit of lifecycle emissions associated with development.</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> welcome this principle, no further comments</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b> Welcome this principle, no further comments</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b> Welcome this principle, no further comments</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> This is an excellent resource, no further comment.</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the</b></p>	<p>Support noted.</p> <p>An outline of the operational standards that development is expected to comply with is set out within the 'How to Use the Tool' section of the MDDC Net Zero Housing Assessment Tool's cover sheet. It is not currently possible to set a limit on the lifecycle emissions associated with development, as this would introduce new planning policy, which could potentially conflict with the adopted policies within the current Local Plan.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>
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07	Tiverton Civic Society	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> This sets out the targets clearly</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> A very thorough and useful guide for those submitting applications, applicants for planning permission being expected to have regard to the principles and objectives</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b> A key principle, well covered throughout the policies</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Very thorough. It is important that new developments are close to, and can easily access, the main town centre services, including shops and schools. Tiverton is certainly not following this principle with new housing stretched out too far in an easterly direction along the Halberton road</p>	<p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Noted.</p>

	<p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> A very thorough checklist of principles</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> Very brief, but includes some useful principles. As we found this summer, ample shade from mature trees is very important.</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b> Good. It is very important that contamination from runoff, particularly from farmland, is carefully managed.</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b> Well covered</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> As this statement says, new houses continue to emit far too much carbon, and 'we need to do much better'. This toolkit sets out clearly many ways in which this improvement can be achieved</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Excellent, if somewhat academic, and in need of clarification.</p>	<p>Support noted.</p> <p>No action required.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>
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08	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b>  Overall a very fine document containing a lot of honourable 'climate related' policy references and good intentions.</p> <p>Issue relating directly to the Statement:  2.7 Why are there exemptions to the 'Statement' for developments subject to 'permitted development rights'?</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b>  Respondent skipped this question</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b>  Respondent skipped this question</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b></p>	<p>Support noted.</p> <p>‘Permitted development rights’ relate to certain types of development which the Government has made exempt from needing to apply for planning permission. The ‘Planning Policy Statement’ applies to all scales and types of development, except development that is subject to ‘permitted development rights’, or is within the small area of the district which falls within Dartmoor National Park.</p> <p>No action required.</p> <p>No action required.</p>

	<p>Respondent skipped this question</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b></p> <p>Respondent skipped this question</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b></p> <p>Respondent skipped this question</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b></p> <p>Respondent skipped this question</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b></p> <p>Respondent skipped this question</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>Respondent skipped this question</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>Respondent skipped this question</p> <p><b>Q13 General Comments</b></p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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	<p>From personal experience, important policies such as for example the NPPF 2021 as included within the statement have been 'overlooked' in past applications by the MD Planning Committee. And conditions as applied to granted permissions do not seem get properly enforced by the seemingly under-resourced Enforcement Department.</p> <p>So I am concerned how much of all the 'good stuff' contained within the 'Statement' will materialise 'on teh ground'?</p> <p>I also have concerns about how much of the 'statement' can be implemented by MDDC and not overruled by national 'political' planning policies?</p>	<p>The climate emergency is increasingly recognised nationally as a significant material consideration in decision-making and appeals. Applicants for planning permission will be expected to have regard to the principles and objectives contained in the 'Planning Policy Statement's' 'Climate Emergency – Planning Applications Checklist' (hereafter referred to as the 'Checklist'), and to show how these have been considered and used in preparing planning applications submitted to the Council for determination. This will be achieved through making the Checklist a new local requirement for the validation of all planning applications submitted to the Council for determination, and this will be amendment made to form "4 – Application for Planning Permission". The Council's preferred approach to demonstrate compliance with the relevant policies in the adopted development plan will be through the completion of the Checklist. The completion of the Checklist will also be the Council's preferred format for Carbon Reduction Statements for major development, as a way to clarify key climate and sustainability points. The information provided on completed Checklists will be proportionate in relation to the nature and scale of development that is proposed.</p> <p>The Checklist provides a way to identify how development proposals satisfy relevant policies in the adopted development plan. Where development takes place that is not in accordance with approved plans for a planning application, enforcement action can be taken by the Council.</p> <p>The Non-Statutory Interim Planning Policy Statement: Climate Emergency has been prepared by the Council having</p>
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			regard to current national planning policy and relevant legislation, which is explained in its section 3.
09	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>I would prefer this to be stronger in wording: there should be no new build planning approved (residential or commercial) without comprehensive energy efficiency including solar power, water collection and recycling and so on.</p>	<p>Objective CP.3.1 ‘Minimising energy consumption’ advocates the use of on-site or locally sourced materials, and incorporation of existing structures into new development.</p> <p>Policy DM1 ‘Sustainable development principles’ of the adopted Local Plan 2013-2033, states that new development must be designed with external spaces for recycling.</p> <p>New development must comply with the national Building Regulations, which have been updated in 2021 and which are subject to review.</p> <p>Part G of the Building Regulations sets out the requirements for rainwater harvesting and greywater recycling “as a means for reducing water consumption to achieve higher water efficiency performance levels.”</p> <p>The most recent changes to the Building Regulations include uplifts to Part L ‘Conservation of fuel and power’ and the introduction of Part O ‘Overheating in new residential buildings’.</p> <p>Part L of the Building Regulations strongly encourages developers to aspire towards zero carbon, setting out that all new homes should provide an uplift in thermal efficiency (against 2013 Building Regulations) of at least 30%, with a minimum 40% of the building footprint accommodating roof mounted solar photovoltaic panels. For non-residential buildings, a 31% reduction of baseline emissions is required.</p>

		<p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b> Respondent skipped this question</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Respondent skipped this question</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> Respondent skipped this question</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> Respondent skipped this question</p>	<p>Part O of the Building Regulations seeks to ensure that new homes are designed to reduce overheating through minimising solar gain and removing excess heat. This is to be achieved through restricting the amount of glazing allowed in a single room, in combination with consideration of cross-ventilation and orientation.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p>
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			<p>Council for determination, and this will be amendment made to form “4 – Application for Planning Permission”. The Council’s preferred approach to demonstrate compliance with the relevant policies in the adopted development plan will be through the completion of the Checklist. The completion of the Checklist will also be the Council’s preferred format for Carbon Reduction Statements for major development, as a way to clarify key climate and sustainability points. The information provided on completed Checklists will be proportionate in relation to the nature and scale of development that is proposed.</p> <p>The Checklist provides a way to identify how development proposals satisfy relevant policies in the adopted development plan. Where development takes place that is not in accordance with approved plans for a planning application, enforcement action can be taken by the Council.</p> <p>The Non-Statutory Interim Planning Policy Statement: Climate Emergency has been prepared by the Council having regard to current national planning policy and relevant legislation, which is explained in its section 3.</p> <p>Although currently not a requirement, applicants for the development of new homes will be encouraged to make use of the Net Zero Carbon Toolkit and Net Zero Housing Assessment Tool in the preparation of planning proposals.</p>
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			Some measures listed within the Checklist relate to the Building Regulations, with which development must also comply.
10	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b> Respondent skipped this question</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Respondent skipped this question</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> Respondent skipped this question</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> Respondent skipped this question</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p>

		<p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b> Respondent skipped this question</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b> Respondent skipped this question</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q13 General Comments</b> Projects should offer a net gain</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>From November 2023, new development will be required to provide a minimum 10% net gain in biodiversity. In the interim, the Council encourages applicants to deliver 10% or more where feasible to do so.</p>
11	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p>	<p>No action required.</p>

	<p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> All worthy and important topics to be addressed that have not been addressed up to this point even though the underlying knowledge and technology has been available</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b> There is an urgent need for sustainable development - right development in the right place for the correct people - more council houses should be built in each development fund from the developers profits</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Each new development should be viewed in conjunction with the current infra- structure - should be encouraging less car use and more affordable public transport, Cycle and walking routes along safe routes should be included. Aging population should also be catered for.</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> Insulation!</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> Again insulation and correct use of ventilation and window sizes.</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b></p>	<p>No action required.</p> <p>Noted.</p> <p>Applications for development are routinely assessed in relation to existing infrastructure, in accordance with Policies S1 and S8 of the adopted Local Plan 2013-2033, which are set out below.</p> <p>Policy S1 'Sustainable development priorities' states that 'All development will be expected to support the creation of sustainable communities by ... promoting sustainable transport by delivering, reducing the need to travel by car, integrating public transport and other forms of sustainable travel such as walking and cycling, and providing safe environments'</p>
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	<p>Both very important - too many developments have been given permission to build on flood plains which will only be made worse by climate change. Water run off has not been given the importance it should have been! Infra-structure and sewage systems - not coping now: can they cope with more houses?</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b> Also very important - too many developers have claimed to "increase biodiversity" in their plans - ploughed up land, destroyed hedgerows and trees, covered vast swathes with concrete then planted a few saplings - I despair!!</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q13 General Comments</b> A sound, well- thought documents and toolkits - my comments are "why have you not done this before? Knowledge and technologies have been around for ages - i taught it in the 80s and it wasn't news then!!</p> <p>Another important question "how is it going to be enforced? Will the planning officers make all these important topics and say what has been</p>	<p>Policy S8 'Infrastructure' states that 'The Council will work with providers and developers to ensure that new development is served by necessary infrastructure in a predictable, timely and effective fashion. Development and transport planning will be coordinated to improve accessibility for the whole community and promote the use of sustainable modes of transport. The Council will set out key infrastructure and facility requirements for new development in an Infrastructure Plan, taking account of existing provision and cumulative impact of new development' and that 'Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be subject to satisfactory mitigation having regard to the latest infrastructure plan.'</p> <p>Paragraph 2.29 of the justification text for Policy S3 'Housing', states that "the Building Regulations will also ensure that new housing meets certain requirements for adaptability and an ageing population."</p> <p>The demographics and needs of local residents will be taken into account during the plan-making stage of the new Local Plan (Plan Mid Devon), and will underpin new policies.</p> <p>New development must comply with the national Building Regulations, which have been updated in 2021 and which are subject to review. The most recent changes include an uplift to Part L 'Conservation of fuel and power', and the</p>
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		<p>met and what has not and then the Planning Committee just pass it anyway? (as happens now with the planning framework document)</p>	<p>introduction of Part O ‘Overheating in new residential buildings’.</p> <p>Part L sets out the regulations for insulation use and standards and strongly encourages developers to aspire towards zero carbon, setting out that all new homes should provide an uplift in thermal efficiency (against 2013 Building Regulations) of at least 30%. For non-residential buildings, a 31% reduction of baseline emissions is required.</p> <p>Part O of the Building Regulations seeks to ensure that new homes are designed to reduce overheating through minimising solar gain and removing excess heat. This is to be achieved through restricting the amount of glazing allowed in a single room, in combination with consideration of cross-ventilation and orientation.</p> <p>The Net Zero Housing and Assessment Tool calculates the potential carbon performance and embodied carbon performance of four common housing types (detached, attached, 1- and 2-bed properties). The tool allows different methods of ventilation to be selected, and takes into account the thermal transfer of building components such as windows, walls, roofs and doors. Different operational standards can be selected to compare the costs and climate impacts of new development.</p> <p>The Net Zero Carbon Toolkit demonstrates a range of design and construction methods for delivering net zero residential development, which includes guidance on windows, interior ventilation, and insulation. The guidance also takes into</p>
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			account embodied carbon and operational energy requirements.
12	Individual	<p>I would like to congratulate the Council on its plans to tackle climate change and improve air quality. The proposals are very comprehensive and carefully thought out - all credit to everyone who has contributed to the document.</p> <p>I am particularly pleased to see section CP.3.3: CP.3.3 Using cleaner energy Renewable energy generation and supply, including on-site where feasible Infrastructure to connect renewable energy systems to the grid (distribution network operator may need to assess) Battery storage or flexibility systems such as V2G (vehicle to grid) We are a group of six and have formed a community company called Heart of Devon Community Energy.</p> <p>We hope to install a 2MW wind turbine in Mid Devon provided we can gain planning permission in the near future. If successful, it should make a substantial contribution to the Council's net zero targets and the improvement in air quality.</p>	Support noted.
13	Devon County Council – Flood and Coastal Risk Management – Environment Group	<p>It's great to see SuDS included within the checklist. I think 'natural watercourses' should be removed from the SuDS section of the checklist though as I worry that this could misinterpreted as using a watercourse to store water (which might not be appropriate).</p> <p>Mid Devon might want to consider adding further information to the toolkit. SuDS can be multifunctional, so you might want to explore whether there are additional benefits of SuDS other than flood risk management.</p> <p>Mid Devon may wish to assess whether SuDS should be planted and</p>	<p>Objective CP.5.1 'Sustainable urban drainage systems (SuDS)' has been amended as follows: SuDS such as rain gardens, swales, <del>natural water courses</del>, communal soakaways, filter strips, retention and detention basins</p> <p>A new measure has been included under Objective CP.5.1 'Sustainable urban drainage systems (SuDS)': <b><u>Are there opportunities for making SuDS features multifunctional, e.g. incorporating play areas within dry</u></b></p>

	<p>designed differently dependant on where in the district you are. For example, an ecologist might want to encourage wetlands and ponds within areas known to have Great Crested Newts.</p> <p>Living Walls and Green Roofs can be used for regulating temperatures within and around buildings.</p> <p>SuDS can treat surface water as well as manage surface water. Mid Devon might want to highlight this.</p> <p>Does Mid Devon want to include a bit on reusing rainfall within the document? Rainfall could be treated before being used or it could be stored and used with no treatment (e.g. water butts).</p> <p>You might want to note that surface water should be managed in accordance with guidance considered suitable at the time of a planning application being submitted.  <a href="https://www.devon.gov.uk">SuDS guidance - Flood Risk Management (devon.gov.uk)</a></p> <p>I would suggest rewording the paragraph in the toolkit to something like the following:</p> <p>This <i>can</i> reduce surface water run-off and support local drainage networks to function effectively. <i>If surface water is managed in accordance with greenfield conditions, then flood risk should not increase downstream.</i></p>	<p><b><u>detention basins, improving water quality, or linking with water reuse systems?</u></b></p> <p>A new measure has been included under Objective CP.5.1 ‘Sustainable urban drainage systems (SuDS)’:  <b><u>Can you demonstrate how habitat creation could be included within SuDS features, and how this links to local ecology priorities?</u></b></p> <p>Objective 4.3 ‘Green infrastructure’ has been amended as follows:  Green and blue infrastructure in private outdoor space, e.g. trees, hedgerows, hedges, green/brown/:blue roofs, vertical climbers, <b><u>living walls</u></b>, water features and landscaping</p> <p>Reuse of rainfall is covered within CP.5.2 ‘Water efficiency and rainwater harvesting (ways to reduce demand on water utilities)’ as ‘Rainwater collection and reuse systems’.</p> <p>A new measure has been included under Reference added to Objective CP.5.3 ‘Reducing the risk of flooding’  <b><u>See Devon County Council’s SuDS guidance: <a href="https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/">https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/</a></u></b></p> <p>The Net Zero Carbon Toolkit has been amended as follows:  This <b><u>will can</u></b> reduce surface water run-off and support local drainage networks to function effectively.</p> <p>The following changes have been made to page 35 of the Net Zero Carbon Toolkit:</p>
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14	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b> Respondent skipped this question</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p>	<p>No action required.</p>

	<p>Respondent skipped this question</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b> Don't build on flood plains</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Stop the government shutting GP surgeries, hospitals and there departments. The banks and post office closing branches etc. Not that you can of course.</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> Use project managers to oversee grant schemes rather than rigid rules and certified builders that mostly only set up to do grant work. The good builders don't take on this nonsense as they are too busy. I have much much more to add on the failure of Green Deal etc but not enough room.</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> Why is there never any reference yo the Specific Heat Capacity of insulation, just the thermal performance? Please look it up and highlight this in future. Check out cork and wood fibre for good examples.</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b> Respondent skipped this question</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b></p>	<p>No action required.</p> <p>Noted. National planning policy requires that inappropriate development in areas at risk of flooding should be avoided.</p> <p>Planning policy can help protect local services. The Council will work with the NHS to help coordinate the provision of healthcare facilities to meet needs arising through new development.</p> <p>Grant schemes are not within the scope of the Non-Statutory Interim Planning Policy Statement: Climate Emergency, which is intended to provide guidance for to assist applicants in submitting planning applications for determination, and to help inform decisions made on those.</p> <p>Energy efficiency standards in buildings are set through the national Building Regulations and which for the basis for the Non-Statutory Interim Planning Policy Statement: Climate Emergency and the 'Climate Emergency - Planning Applications Checklist'.</p> <p>While not explicitly referred to within the 'Planning Policy Statement', the Specific Heat Capacity of insulation would need to be considered to comply with Part L of the Building Regulations.</p>
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15	Individual	<p>I welcome the fact that MDDC are engaging with the climate emergency and in a strategic policy led way. You are somewhat late in tackling this but it is better to be late rather than not to attend at all so I certainly support the approach.</p> <p>What I have not seem within the statement is any particular reference to contribution that the natural environment and it s protection during development can have both on reducing carbon loss but also securing</p>	<p>Support noted.</p> <p>A new measure has been included under Objective CP.6.1 ‘Protecting existing Natural Capital and biodiversity’:</p>

	<p>carbon for the long term and meeting some of the carbon efficiencies desired by design.</p> <p>A greater emphasis on protection soils and existing vegetation, especially trees, could be a vital addition to overall ‘toolkit’ that ensures a development achieves or exceeds net zero.</p> <p>Current policy in relation to the retention and protection of existing landscape features during development is weak as far as I can see and in my direct experience locally, this is further exacerbated by a weak policy on the provision and maintenance of long term ‘landscape’ planning that can deliver so much in terms of climate change mitigation, carbon sequestration and energy efficiency.</p> <p>I therefore broadly support the development of the Climate PPS however I strongly recommend it includes and integrates components that properly value existing carbon sinks in terms of soil, biodiversity and vegetation, especially trees – that in doing so it encourages short and long term protection of these carbon assets. Furthermore that value is placed on the development, implementation and maintenance of landscape / green infrastructure that will help to both offset carbon expenditure but more importantly can provide both provide eco-system benefits, energy efficiencies and potentially carbon asset gain.</p> <p>Please find attached† a useful design document published by the trees and design action group (TDAG) that illustrates some of what I am proposing.</p> <p>† <a href="#">First Steps in Trees and New Developments</a></p>	<p><b><u>Protection of soil from erosion and compaction, inappropriate planting*, avoidance of unnecessary digging or mixing of soils, or surface sealing (for carbon and water storage, as a biodiversity reservoir, and as a buffer against pollution)</u></b></p> <p><b>* Reference:</b>  <b><u><a href="https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england">https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england</a></u></b></p> <p>A new objective (CP.6.4 ‘Carbon storage’) has been included under Principle CP.6 ‘Resilience of natural systems and resources’:</p> <p><b>CP.6.4 Carbon Storage</b>  <b><u>Landscaping proposals to consider different habitat types for carbon storage and sequestration</u></b>  <b>Reference: Natural England (2021) Carbon Storage and Sequestration by Habitat</b>  <b><u><a href="http://publications.naturalengland.org.uk/publication/5419124441481216">http://publications.naturalengland.org.uk/publication/5419124441481216</a></u></b>  <b><u>Environmental Benefits from Nature Tool</u></b>  <b><u><a href="http://publications.naturalengland.org.uk/publication/6414097026646016">http://publications.naturalengland.org.uk/publication/6414097026646016</a></u></b></p> <p>Carbon sequestration is also referred to within Objective CP.6.2 ‘Creating and enhancing biodiversity’:  Restoration or new planting of hedges, hedgerows and trees (for habitat value and carbon sequestration, ecological and amenity value)</p>
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			<p>A measure under Objective CP.6.1 ‘Protecting existing Natural Capital and biodiversity’ has been amended as follows:</p> <p>Protection of existing trees <b><u>(with particular regard to ancient trees and woodland, and veteran trees), mature</u></b> hedges and hedgerows during site preparation, demolition and/or construction works (for ecological value, carbon sequestration and amenity value). <b><u>A minimum 5-metre buffer zone should be preserved between development and retained hedgerows, which should not be utilised as residential boundary treatments</u></b></p> <p>Policy S1 ‘Sustainable development priorities’ of the adopted Local Plan 2013-2033, states that ‘All development will be expected to support the creation of sustainable communities by ... minimising impacts on biodiversity and geodiversity by recognising the wider benefits of ecosystems, delivering natural environment objectives, providing a net gain in biodiversity’</p> <p>The supporting text of Policy DM26 ‘Green infrastructure in major development’ of the adopted Local Plan 2013-2033, states that ‘Development incorporating green infrastructure will be required to submit management and maintenance details for the proposed green infrastructure’.</p> <p>A new measure has been included under Objective CP.6.3 ‘Nature recovery and wildlife networks’:  <b><u>Protection or enhancement of existing green space</u></b></p> <p>From November 2023, new development will be required to provide a minimum 10% net gain in biodiversity, for which a</p>
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			<p>minimum 30-year management plan will need to be submitted. In the interim, the Council encourages applicants to deliver 10% or more where feasible to do so.</p> <p>A measure in Objective CP.5.3 ‘Reducing the risk of flooding’ has been amended to the following and includes reference to ecosystem services:  <b><u>Inclusion of N</u></b>nature-based solutions, <b><u>riparian or flood tolerant tree and vegetation planting, natural vegetation of habitats, e.g.</u></b> green/brown/blue roofs, communal basins <b><u>and or</u></b> ponds, green spaces within blocks, and <b><u>or</u></b> green verges to retain rainfall and reduce surface water runoff</p> <p>A new measure has been included under CP.4.3 ‘Green infrastructure’:  <b><u>Relationship between vegetation, building, distance, and aspect to regulate internal temperatures</u></b></p>
16	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b>  There is no climate emergency, the document is climate cult insanity. There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p>	<p>The comments made are noted. However, these are personal views, which do not reflect the prevailing legislative context at international and national levels in response to climate change and the need for action to be taken to move to a net zero carbon future. This legislative context is detailed in section 3 of the Non-Statutory Interim Planning Policy Statement: Climate Emergency.</p>

	<p>There is no climate emergency, the document is climate cult insanity. There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b> Insane</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b> Abject nonsense.</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b> Climate cultism</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b> More likely to be colder, but don't let the truth (or science) get in the way of a good story</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b> You made a complete mess over the last 50 years, I don't expect any improvement</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b> Climate cult nonsense</p>	
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		<p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>There is no climate emergency, the document is climate cult insanity. There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>Climate cult nonsense</p> <p><b>Q13 General Comments</b></p> <p>Their is no climate emergency, just climate cultism and a delinquent, manipulated, Swedish teenager, dictating how our country is run.</p>	
17	Individual	<p><b>Q3 Comments on Planning Policy Statement (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>There is no climate emergency, stop this woke, climate cult, nonsense. There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q4 Comments on Climate Emergency - Planning Applications Checklist (If you are responding to specific sections or paragraphs of the</b></p>	<p>The comments made are noted. However, these are personal views, which do not reflect the prevailing legislative context at international and national levels in response to climate change and the need for action to be taken to move to a net zero carbon future. This legislative context is detailed in section 3 of the Non-Statutory Interim Planning Policy Statement: Climate Emergency.</p>

		<p><b>consultation documents, please support us by indicating which sections these are in your response)</b></p> <p>There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q5 Planning Applications Checklist Climate Principle 1: Sustainable development</b></p> <p>There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q6 Planning Applications Checklist Climate Principle 2: Increasing accessibility, reducing the need to travel, and efficient movement of goods</b></p> <p>There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q7 Planning Applications Checklist Climate Principle 3: Improving energy efficiency</b></p> <p>There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q8 Planning Applications Checklist Climate Principle 4: Adapting to higher temperatures</b></p>	
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	<p>There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q9 Planning Applications Checklist Climate Principle 5: Mitigating flood risk, and water resource resilience</b>  There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q10 Planning Applications Checklist Climate Principle 6: Resilience of natural systems and resources</b>  There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q11 Comments on Mid Devon Net Zero Carbon Toolkit (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b>  There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q12 Comments on Mid Devon Net Zero Housing Assessment Tool (If you are responding to specific sections or paragraphs of the consultation documents, please support us by indicating which sections these are in your response)</b></p>	
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		<p>There is no policy as ill-thought out, as ineffective, as madcap or as unnecessarily punitive as net-zero. It is literally destroying lives. Man made climate change is the greatest scientific fraud in history. Even if it were true, only China &amp; India could make any meaningful difference.</p> <p><b>Q13 General Comments</b> There is no climate emergency, stop this insane nonsense</p>	
18	Individual	<p>Section 3.1 of the ‘Non-Statutory Interim Climate Change Planning Policy Statement’ states: ‘The Council has set an ambitious target to achieve net zero by 2030.....’ This policy was set with no accompanying costing (and still is unless things have changed since Councillor Slade’s email to me).</p> <p>Such a commitment, whilst entirely laudable, is financially reckless (as, in a different context, Liz Truss demonstrated recently). There can be no public mandate for this target without a costing; it commits the Council to write a blank cheque in these tough economic times.</p> <p>This might suggest I am denying the existence of the global climate emergency. Far from it! The UN is now saying that global warming has already happened and is inevitable (as explained in the attachment). I believe Extinction Rebellion’s diagnosis understates the gravity of the situation but- like government and councils- their cure is ill thought through (and tactics dubious).</p> <p>Importantly, the emergency is global, not local to Mid Devon, and requires global solution. Any money designed to counter the emergency - needs to be spent globally, not nationally, not locally, not just in making the council carbon neutral. It needs to be spent in the places/ projects that will have the greatest impact per pound spent not in local sub-optimisations. Otherwise there is a gross waste of money- which is particularly unwise in these tough economic times.</p>	<p>The comments made are noted. However, these are personal views, which do not reflect the prevailing legislative context at international and national levels in response to climate change and the need for action to be taken to move to a net zero carbon future. This legislative context is detailed in section 3 of the Non-Statutory Interim Planning Policy Statement: Climate Emergency.</p> <p>The transition towards a net zero carbon economy will require the implementation of new technologies and practices which will have their associated costs. Such costs will need to be weighed up in relation to the disbenefits and associated costs of not taking action to address the climate emergency and extreme weather events. The Council is continuously reviewing and identifying what cost benefits and other implications are involved and how to address them.</p>

		<p>For example, a solar panel installed in India or China would reduce carbon emissions by roughly three times more than one in Northern Europe!</p> <p>The Government's recent admission that 'decarbonising' public buildings will cost up to £50 billion (at a time of severe financial stress) is money that could also be spent to much greater effect in combatting the problem at a global level. So could MDDC's (unlimited) spending on carbon neutrality.</p> <p>MDDC has already invested in a raft of measures which were economic and reduced the Council's carbon emissions; any remaining projects are therefore expensive (per unit of carbon emission saved)- more expensive than other carbon-reducing options within its area, within the country, within the world.</p> <p>Furthermore, money earmarked in response to the emergency is, as the UN is pointing out, is needing to be increasingly spent in mitigating its impact rather than trying to avoid it by reducing carbon emissions.</p> <p>Meeting the MDCC carbon neutral target will thus spend money very inefficiently in combatting climate change. I propose that the policy be fundamentally reviewed to make better use of council taxpayers money.</p> <p>Much of the rest of the document- settling guidelines for good practice in energy conservation- is entirely reasonable as long as this is just pulling together advice from expert sources rather than reinventing the wheel to create an individual MDDC set of recommendations. Probably this is best done once for all local authorities rather than locally</p>	
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		<p>*For example, the cost of a unit of solar electricity in Northern Europe is about \$50/kwh. In India and China it is about \$30 and \$25 or less in Africa. A colossal difference each time a council thinks of installing- solar panels. But the difference is, in fact, much greater than just this cost. In Europe, the solar would displace gas- the marginal fuel for electricity. In India and China it would displace coal. 1kwh of electricity produced from coal emits 1 ½ times as much CO2 as gas.</p>	
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## Appendix 1: Key Consultees

In addition to the following consultees, Mid Devon's district Councillors and one hundred and forty-two individuals who were registered on the Council's Plan Mid Devon mailing list at the start of the Issues Consultation, were invited to make representations.

### Specific Consultation Bodies

#### Duty to Cooperate

Civil Aviation Authority  
Dartmoor National Park Authority  
Devon County Council  
East Devon District Council  
Environment Agency  
Exeter City Council  
Exmoor National Park Authority  
Highways England  
Historic England  
Homes England  
Marine Management Organisation  
Mendip District Council  
Natural England  
NHS Devon Clinical Commissioning Group

NHS England Local Area Team  
North Devon District Council  
Office of Rail and Road  
Plymouth City Council  
Sedgemoor District Council  
Somerset County Council  
Somerset West and Taunton District  
South Hams District Council  
South Somerset District Council  
Teignbridge District Council  
Torbay Council  
Torridge District Council  
West Devon Borough Council

#### Other Statutory

Advisory Council for the Education of Romany  
& other Travellers  
Blackdown Hills AONB Partnership  
Coal Authority  
CPRE Devon  
Devon County Council - Services for Children  
(Disability Information & Support)  
Devon & Somerset Fire and Rescue Service  
Devon and Cornwall Constabulary  
Devon Association of Local Councils  
Devon Countryside Access Forum  
Devon Local Nature Partnership  
Devon Partnership NHS Trust  
Devon Wildlife Trust  
Diocese of Exeter, Church of England  
Equality & Human Rights Commission  
Federation of Small Businesses  
Forestry Commission  
Her Majesty's Prison & Probation Service

House of Commons  
London Gypsy Traveller Unit  
National Grid  
National Trust  
Network Rail  
NHS Northern, Eastern and Western Devon  
Clinical Commissioning Group  
NHS Property Services Ltd  
Office of Rail Regulation  
Regulator of Social Housing  
Royal Devon and Exeter NHS Foundation Trust  
South West Water  
Sport England  
The Woodland Trust  
Torbay and South Devon NHS Foundation  
Trust  
UK Power Networks  
Vodafone Corporate Communications  
Western Power Distribution

## Mid Devon Town and Parish Councils

Bampton Parish Council	Kentisbeare Parish Council
Bickleigh Parish Council	Lapford Parish Council
Borden Gate Parish Council	Loxbeare Parish Council †
Bow Parish Council	Morchard Bishop Parish Council
Bradninch Parish Council	Morebath Parish Council
Brushford Parish Council	Newton St Cyres Parish Council
Burlescombe Parish Council †	Nymet Rowland Parish Council
Butterleigh Parish Council	Oakford Parish Council
Cadbury Parish Council	Poughill Parish Council
Cadeleigh Parish Council	Puddington Parish Council
Chawleigh Parish Council	Sampford Peverell Parish Council
Cheriton Bishop Parish Council	Sandford Parish Council
Cheriton Fitzpaine Parish Council	Shobrooke Parish Council
Clannaborough Parish Council †	Silverton Parish Council
Clayhidon Parish Council	Stockleigh English Parish Council
Coldridge Parish Council	Stockleigh Pomeroy Parish Council
Colebrooke Parish Council	Stoodleigh Parish Council
Copplestone Parish Council	Templeton Parish Council
Crediton Hamlets Parish Council	Thelbridge Parish Council
Crediton Town Council	Thorverton Parish Council
Cruwys Morchard Parish Council	Tiverton Town Council
Cullompton Town Council	Uffculme Parish Council
Culmstock Parish Council	Uplowman Parish Council
Down St Mary Parish Council	Upton Hellion Parish Council
Eggesford Parish Council	Washfield Parish Council
Halberton Parish Council	Washford Pyne Parish Council
Hemyock Parish Council	Wembworthy Parish Council
Hittisleigh Parish Council	Willand Parish Council
Holcombe Rogus Parish Council	Woolfardisworthy Parish Council
Kennerleigh Parish Council	Zeal Monochorum Parish Council

† omitted as clerk's post vacant at time of issue

## General Consultation Bodies

AgeUK Mid Devon	Montagu Evans
Carter Jonas	Nexus Planning
Collier Planning	Paul Green Planning
Crediton Town Team	PCL Planning Ltd
Devon Communities Together	Randell Burton Architects
Devon Ramblers Association	Regen SW
DiAS Devon Information, Advice and Support	Richard Stagg Rural Surveyors
EDable Architecture	Rull Hamlet Association
Four Villages Environmental Group	Savills
Grand Western Canal Advisory Committee	SSA Planning Limited
Greenslade Taylor Hunt	Sustainable Bradninch
Hallam Land Management Limited	Sustainable Crediton
Heart of South West LEP	Sustainable Tiverton
Hele Conservation Society	Tetlow King Planning
Home Builders Federation	The Gardens Trust
Involve Voluntary Action in Mid Devon	Tilia Homes
Jackson-Stops	Tiverton & District Community Transport Association (incl. Mid Devon Shopmobility)
Jacobs	Uffculme Green Team
McMurdo Land Planning & Development Ltd	Waddeton Park Ltd
Mid Devon Mobility	