

Transition Tavistock response to Climate Emergency Planning Policy and Guidance

[1.1] Transition Tavistock supports urgent action on planning and building regulations. Development approved now will have impact over half a century or more so must both mitigate and adapt to climate change.

[4.2] Transition Tavistock welcomes the councils' declarations of climate and biodiversity emergency and agree that these require action prior to the review of the JLP. As a community group with a record of promoting sustainability in sectors including energy, transport and food we recognise planning policy as a key enabler or hindrance for positive change.

[5.10] Would be good to include a key transport document in this section, eg [Decarbonising Transport](#).

[9.3] We agree that having a simple web-based tool with clarity on what is required is important, particularly for householders considering extensions and for small businesses or not for profit organisations making decisions about their buildings.

[10.3] We support the inclusion of a new strategic objective on these lines. We think "moving away from natural gas and oil" is a weak phrase. Perhaps "avoiding fossil fuel use". Also "increasing walking and cycling opportunities" makes these sound like a leisure choice. Would prefer something stronger such as "Ensuring accessible walking and cycling connections"

[15.1] This section could add points about the benefits of some of the policies proposed in addressing current inequalities. For example, rising energy prices affect people on low incomes in poorly insulated homes. Young people and those unable to drive for health reasons have limited travel choices when new housing lacks safe walking connections or public transport.

[Q1] These new requirements can work if they are adopted promptly and communicated well, and if all public bodies involved in the planning process, including statutory consultees and local authority members, are trained to apply them.

[Q2] None of the proposals go "too far". Most appear a realistic aim in the current context, but we hope to see policies regularly revised to become more ambitious in addressing climate change. As in specific comments elsewhere, we would like to see them go further on sustainable transport and protection of biodiversity including soil.

[Q3] As pointed out by others making comments, a key challenge will be ensuring developers and their professional advisors take these policies seriously and show ambition themselves in applying them. Otherwise they could end up being ignored in practice because council officers and members, and community groups like ourselves, lack the capacity to pick through all the detail to challenge "greenwashing", or because later alterations to plans, which get far less public scrutiny, back track on commitments.

[Q5] There is urgency in getting this into practice so it impacts as much as possible of the developments which take place in the coming years. Any improvements in process or communication can be included in future updates.

[Q6] Transitional arrangements for the policy as a whole should be as short as can be achieved without risking the success of the project. The proposed changes will benefit the future occupiers of buildings both financially and in quality of life. There may be a case for longer transition on particular points, eg where technology available is changing rapidly.

[Q7] As the intention is for this to be web based, it should be possible to reference useful guidance and sources of good practice that does not have to be developed by council staff.

[Q8] Yes. When members of the public or community groups attempt to scrutinize a planning application beyond the single household size it takes a lot of effort to work out which documents are relevant to their concerns and where the significant detail is. The Statement of Compliance should be a key document, properly checked by planning officers and referenced back to the detailed evidence in a way that anyone can follow.

[Q9] The SPD points on solar gain seem to apply to new build, not to extension, conversion or change of use. While for these much of the site constraints will be fixed, would be good to have some pointers in this factsheet. Eg where a large house is converted to flats and garden turned into car park there must be an increased risk of overheating? What is implication if change of use also affects time of day building occupied?

[Q11] Yes.

[Q13] Seems a good idea.

[Q14] Not sure this would work. Are warranties of over 30 years enforceable anyhow?

[Q15] Proposal in #18.12 seems reasonable for this type of development.

[Q16] Yes. This is a key point when the building owners are thinking about its future. They should not be allowed to ignore something so important.

[Q17] Not ideal – acknowledged that methodology needs updating. However it may be the only practical tool at present.

[Q19] Yes, some flexibility of approach /measure, eg for disability adaptations, community organisations, unusual buildings, while keeping the focus on some form of gain in climate mitigation and adaptation will aid public acceptance and avoid this becoming a source of “bureaucracy gone mad” stories.

[Q21] Perhaps outline the measures but allow the actual achievement to be through others, so that opportunities discovered during building process are allowed / encouraged.

[Q22] Yes

[Q23] Yes

[18.24] Placement of this within Factsheet 1 is confusing. Is it suggesting that any application in the title categories triggers a requirement for EV points? While keen to see a quicker transition

to EVs, we think it would be unreasonable – eg as a consequence of installing a conservatory – and likely to cause resentment against climate change policies in general. In general, the time for an existing home to add an EV point is when a current occupant gets an EV – then will benefit from most up to date system.

[Q31] No. Vehicles charged at commercial premises are likely to do more journeys / day than domestic, so will require at least moderate charge rate.

[Q32] No. This is a very broad class and includes some small businesses in villages. If a parking area for a single business, then they will be best placed to judge balance between how long customers stay / how quickly they want to charge. If shared, eg a shopping centre, more likely to need 50kw, but market itself likely to push this. Moreover, this whole area is one where national policy and practice is rapidly changing. Better to address this through the forthcoming requirement for local authorities to develop plans for chargepoints. (See "[Taking Charge](#)".)

[Q33] Yes – the sooner and more ambitious the better. If new developments are built to ensure high compliance with climate-friendly features there will be a significant and enduring impact on carbon costs. Being able to apply much more rigorous rules in future is welcome.

[Q34] Yes

[Q36] Yes

[Q38] No reason for lower %, but could seeking higher for energy intensive use classes, if these can be defined.

[Q39] Possibly? But depends on whether there is shading from higher buildings nearby.

[Q40] Yes – but not just aspect that needs to be favourable – also need to take shading eg from trees into account. And if it is applied to extensions it belongs in Factsheet 1, not here.

[Q42] Unless strong evidence for one being both more durable and more effective, better not to specify unless relevant to appearance in a particular setting.

[Q43] Yes – otherwise an extra capital cost which householder may not see as priority, particularly if property is let. (Presumably means onsite "electricity" generation, not any other form of energy.)

[Q44] Yes – to new buildings.

[Q45] Initially, yes. Heat pumps are unfamiliar to most homebuyers, and the industry supplying and installing them is currently stretched. So a risk of delays to projects, especially for small developers, poor standards of installation, and householders not making best use of them. However, these factors also mean the shift will not happen without pressure from planning system. Solutions lie outside planning process – eg leadership from major housebuilders in "selling" the benefits and giving buyers confidence and handover support.

[Q46] Yes.

[Q48] More of a concern is whether councils have the expertise / capacity to check how well the principles given in the SPD on solar gain have been applied for the particular site. Does any statutory consultee have the remit or independence to review a Solar Master Plan and question its conclusions or how they have been acted on? If council staff, are they trained on this?

[Q49] Measures to reduce car dependence through the siting and layout of new developments would reduce the space required for car parking. See "[Building Car Dependency](#)" cover photos for some recently built tarmac deserts, and imagine them in 40 degree heat.

[Q50] Yes – and ideally this would include ensuring that all materials used in a building are capable of recycling or reuse in the future.

[Q52] Yes

[Q54] The suggested evidence seems open to fraud. Is there a national system for sample checking – eg via Trading Standards.

[Q64] No. Vehicles charged at commercial premises are likely to do more journeys / day than domestic, so will require at least moderate charge rate.

[Q65] No. This is a very broad class and includes some small businesses in villages. If a parking area for a single business then they will be best placed to judge balance between how long customers stay / how quickly they want to charge. If shared, eg a shopping centre, more likely to need 50kw, but market itself likely to push this. Moreover, this whole area is one where national policy and practice is rapidly changing. Better to keep these details as options to evaluate through the forthcoming requirement for local authorities to develop plans for chargepoints. (See "[Taking Charge](#)".)

[19.50] No objection to this, but it is a very minor gain. Most electric bikes have batteries that lift off for charging from a standard plug.

[19.52] This is a welcome addition to policy, but needs to be rigorously applied, with the assessments challenged by council officers. If it just leads to developers providing a standard glossy assurance that nothing would be viable it will be of no use. We would like to see mobility hubs outside Plymouth as well. Could something be added to say that development of strategic sites on the edge of market towns should be assessed for the potential to include a mobility hub / transport interchange?

[19.55] See comments on Q66 below. Even without changing policy on what is required for active travel, a far higher standard of evidence of compliance with policy should be required of applicants and should be properly checked by councils.

[Q66 – 5 paragraph response]

This should have a much stronger message about building in connectivity via sustainable transport modes. We have seen plans presented which claim to comply with JLP policies but ignore the practicalities needed for active travel and access to public transport to be a reality. Examples include reliance on a nearby cycle track from which there is no convenient access from

the development, “cycle paths” with steps on, connections on foot reliant on stretches of road with no or very narrow pavements, and routes to school from major new estates crossing main roads via islands. A recently built estate requires people leaving it on foot to cross a main road to walk the half mile into town, as the developer placed – and councils allowed – a verge with no surfaced path within in it on the estate side.

For major developments much more could be demanded from the transport assessment currently provided, which focus on vehicle movements and make unrealistic claims about walk times and access to public transport. For example, rather than giving a crows-fly distance to school, the actual walking time by a specified safe route for a parent with buggy and school age child should be shown. Reference to nearby bus services should be realistic about frequency and allow for the time taken to cross roads to reach a stop.

There is no mention of cycle parking being a requirement for commercial developments. If existing policies already cover this, please reference.

[19.58] This is a vital point, and drive through restaurants are merely an extreme example. Many other facilities are designed with only drivers in mind, with pedestrian access inconvenient rather than through the obvious shortest route. As amply evidenced by Transport for New Homes reports, estates where cars squeeze out front gardens and pedestrian space are depressing to walk through, which itself reinforces car use.

[19.59] What does this mean here? As stated, compliance with 19.58 just means showing that access is possible without a car, not that it is easy, safe or attractive.

[Q68] Yes. The only exception would be adaptations of existing isolated rural buildings – eg farm B&B.

[Q69] Every new home or business building should have bike storage in some form. Even the smallest new development should show a safe route for walking and wheeling to the nearest settlement. Larger ones should be required to use their best efforts to add new connections to the local network of traffic free routes, eg by negotiating passages through to neighbouring developments, constructing links within their site that contribute to a longer through route, or funding improvements to existing routes in the neighbourhood. We have reservations about developers funding specific bus services, as this can lead to services which are not well integrated with the wider network, and which may cease when the S106 funds run out.

[Q70] There should be a key design principle that the layout on the site being developed, including its connection points to adjacent areas, should make walking (which includes wheelchair and pushchair use) and cycling the easiest option for moving around. This means, for example, having a network of footways rather than just following the roads; creating access points for pedestrians direct to adjacent areas of housing, shops or public facilities; leaving gaps for pedestrian and cycle access to any adjoining land which may be developed in future.

For example where a new housing estate is adjacent to a retail area, there should be direct foot and cycle access through the boundary, rather than pedestrians having to follow the car route out of one access road and back via another. While a neighbouring landowner may refuse access, the developer should at least be required to show where access points have been

considered, and in a case like this to leave a space so that the option could be reviewed in future. Councils could also take an active land broker role in securing links at an early stage in planning.

For a major development, if a developer claims that sustainable transport is assured by access to a bus route, they should be required to fund or build well designed bus shelters in or connected by a well lit walkable route.

[Q71] Reliance on the private car will remain higher in rural than urban areas, but both can be reduced. Otherwise urban areas will continue to have congestion from rural residents visiting or passing through, the many rural residents who do not have unlimited access to a car will continue to be isolated, and hazards from traffic deter walking around some villages.

[Q72] [Transport for New Homes](#) reports and checklists, and [Walking for Everyone](#) (Living Streets / Sustrans – detailed guidance on inclusive walkability based on thorough consultation with marginalised groups.)

[20.6] There is no supporting detail to this requirement. How will councillors assessing an application, or the public, know whether the measures the applicant describes are adequate to protect the soil of a particular site?

[20.9] This could do with clearer wording. It seems to confuse green space within a development and the larger greenfield site on which it is built? It is not clear what level of protection / enhancement is expected, or what evidence required. We support the idea of allocation of land for food production within new developments.

[20.11] There will be considerable benefit in trying to minimise the extent of impervious surfaces to cause least disturbance to the water table

[Q73] This should be enforced in all cases as a matter of fairness and to protect other properties in the area from the adverse effects of run-off. If a persistent problem, efforts should be made to publicize and explain the requirement, and to identify and influence the contractors undertaking projects without permission.

[Q76] Yes, as where these are eg infill in towns, they may still have adverse impact, eg on drainage patters or through cutting off wildlife corridors.

[20.14] We endorse the importance of biodiversity and habitats, and welcome the intention to provide further guidance, for example requiring developers to consider pollinators and birds in initial planting schemes, and avoid designs that depend on pesticide use. Verges and green spaces within developments should be practical to manage sympathetically for nature – not all neatly mown grass. Developers should be challenged to show this in their promotional materials and to encourage public understanding that a healthy natural environment is not tidy.

[Q74] Yes, definitely. There are too many cases of development resulting in removal of mature trees and established hedges rather than being planned around existing valuable nature.

[Q75] A common mistake is to equate replacement planting schemes with what is being lost. Long-established natural habitats should be protected not built on. Where there is new planting it needs to be the right plant in the right place. In some cases leaving land to revert to nature by benign neglect can achieve more than tree planting schemes.

[Q78] In the face of the necessity to build on greenfield sites the scoring system seems reasonably worthwhile. We would rather minimize building on greenfield sites and have the land sympathetically managed for other purposes. We also note that some brownfield sites now a nature-rich habitat after years of non-use.

[Q79] Yes – the wider context around the habitats is important. We note that the London scheme is relatively new, so time may be needed both to learn how that works in practice and to adapt for a more rural / coastal context.

[Q84] We agree with DEV32 that offsetting should be the last resort, and circumstances of use extremely exceptional. As with other S106 funding, there is a serious risk that Councils come to depend on offset income to deliver schemes for local carbon capture, rather than budgeting for them from other funding sources. This makes them vulnerable to developers offering to offset rather modify plans.

[Q86] See Q84. Projects funded through offset should be “extras”, not things like cycle infrastructure or habitat restoration that should be done anyhow. The voluntary sector should not be expected to compromise their principles by having to bid for offset-funded grants.

[Q87] Yes, and on introduction an expectation should be set that it is completed clearly – eg with paragraph references and exact document titles - so that non-specialists can easily identify the evidence. It should not be acceptable to refer every question just to the Design & Access statement.

[Q88] Where there are subsequent applications to vary planning conditions, the Statement of Compliance should be updated, with changes identified.

[Q89] Yes

[Glossary]

While this is a correct definition of active travel, it is worth noting in the context of this policy that it may be part of a longer journey which includes public transport.