

East Devon Local Plan – Topic Paper

Chapter 6. Mitigating Climate Change

Audit trail local plan evolution document and consultation statement

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Contents

1	Introduction.....	4
2	The Publication draft of the Local Plan	4
3	Summary of proposed redrafting of Chapter 7a of the consultation plan	4
4	Issues and Options consultation	5
5	Draft plan consultation	6
6	Further Regulation 18 consultation Spring 2024.....	6
7	Sustainability Appraisal feedback	6
8	Habitats Regulations Assessment	6
9	Assessment of policies in chapter 7 (now renamed chapter 6).....	7
10	Conclusions.....	65

1 Introduction

- 1.1 This is one of a series of topic papers that will sit behind and help explain the content of and evolution of the Publication draft of the East Devon Local Plan.
- 1.2 There may be new versions of this topic paper as plan making progresses to Publication and thereafter into and through plan Examination.
- 1.3 This topic paper specifically addresses Chapter 6 of the Publication Regulation 19 plan. It should be noted in the draft plan it was chapter 7 of the plan that addressed climate change and adaptation matters. The adaptation matters are now, however, moved into a new chapter 7 of the plan.

2 The Publication draft of the Local Plan

- 2.1 This report is a redraft of an earlier report and in revised form it is specifically concerned with supporting the local plan at the Regulation 19 stage of plan making work. There are specific Government regulations that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).
- 2.2 The proposed Publication draft text of the local plan is an edited and amended draft of the consultation draft plan published in November 2022. The draft plan was consulted on under plan making Regulation 18 with further limited additional consultation under this regulation in the Spring of 2024.

3 Summary of proposed redrafting to form Chapter 6 of the Reg 19 consultation plan

- 3.1 Chapter 6 of the Reg 19 plan contains a series of policies on Climate change and low carbon and renewable energy. In the consultation draft Local Plan (November 2022) there were a total of 8 policies covering these matters.
 - 3.2 Several changes have been made to form Chapter 6 to reflect consultation responses and a desire to make the document and policies clear and focussed, reflecting the update on national policy. This has resulted in three policies in the draft plan being combined (Policy 29, 30 & 31) to provide a clear policy on low carbon and renewable energy. Supporting text has also been refined.
 - 3.3 Other key changes from the Draft Plan to the Publication Plan include:
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- Net-zero Carbon development policy: change policy wording and aligns with the requirements and standards outlined in the Future Homes Standard (FHS) & BREEAM.
- Energy Storage policy: Added the requirement to comply with the latest National Fire Chiefs Council Guidance to address fire safety concerns
- Heat Network policy: The policy now allows for more flexibility in deciding whether to implement a heat network, and a feasibility study will be required for all potential new heat network proposals.

4 Issues and Options consultation

- 4.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options¹ report. This included a series of questions that responses and comments were invited on. A feedback report was published².
- 4.2 Question 6 sought views on the approach we should take in respect of solar arrays and windfarms. The most popular option by far with 60% support was for us to identify suitable areas for solar and wind energy. 16% of people felt we should offer general support and just 6% felt we should take a more restrictive approach. 5% of respondents felt that none of the options were suitable.
- 4.3 Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using ‘waste heat’, and promoting community led renewable energy schemes. We asked if people agreed with these and 59% of respondents answered yes.
- 4.4 In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. We asked about which approaches we should favour. Slightly more people supported planning to ensure net zero carbon in new developments from a future date as opposed to from plan adoption – 43% to 37%. 10% of respondents felt we should either not have a policy or take a different approach.
- 4.5 Question 6 sought views on the approach we should take in respect of solar arrays and windfarms. The most popular option by far with 60% support was for us to identify suitable areas for solar and wind energy. 16% of people felt we should offer general support and just

¹ [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

² [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

6% felt we should take a more restrictive approach. 5% of respondents felt that none of the options were suitable.

5 Draft plan consultation

- 5.1 In Draft Plan consultation, climate change was addressed in Chapter 7. The feedback report, summarising the issues raised in the consultation can be read here (starting on page 325) [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](#).
- 5.2 Responses were received from the range of government organisations involved in climate change, namely Devon County Council, The Environment Agency (responsible for the Environmental related issue), Climate change issues were also raised by other organisations including Exeter City Council, town and parish councils, Sidmouth Cycling Campaign, National Farmers union and the National Trust. In addition, Climate was a common concern from members of the public and developers.
- 5.3 Further detail is contained in the tables for each policy that follow.

6 Further Regulation 18 consultation Spring 2024

- 6.1 Policies in this chapter were not included in the Further Draft Local Plan consultation.

7 Sustainability Appraisal feedback

- 7.1 The draft local plan was supported by a Sustainability Appraisal³ (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.
- 7.1 The SA noted the climate change policies are likely to have major positive effects on minimising carbon emissions, health and well-being, access to services, jobs, and employment, and connectivity and transport. Minor positive effects are noted for several other objectives. There are a few negative uncertain effects, which can be mitigated to reduce their impact.

8 Habitats Regulations Assessment

- 8.1 The local plan will need to be assessed under the Habitat Regulations. An assessment of policies in the draft plan has been produced, available at [east-devon-local-plan-hra-110723-2013-doc-from-footprint.pdf \(eastdevon.gov.uk\)](#)

³ [sa-of-pos-consultation-draft-lp_2022.pdf \(eastdevon.gov.uk\)](#)

9 Assessment of policies in chapter draft plan chapter 7 (now renamed chapter 6 in the Reg 19 plan)

9.1 Policies are reviewed below.

General issues raised on Chapter 7a of the draft plan

Chapter 7a focuses on climate change and promotes the net-zero-related policy, including low carbon and renewable energy and building standards that could lead future new homes to net zero.

Issues and options consultation

Question 6 sought views on the approach we should take in respect of solar arrays and windfarms.

The most popular option by far with 60% support was for us to identify suitable areas for solar and wind energy. 16% of people felt we should offer general support and just 6% felt we should take a more restrictive approach. 5% of respondents felt that none of the options were suitable.

Many who responded with option 1 felt it was very important to encourage renewables whilst protecting the most important areas in the district like the AONB. Despite this, there was considerable concern over the potential visual impact of both technologies, even from those who responded with option 1. Some who responded with option 2 felt that a more flexible approach was needed, taking into account the local populations views and the Town Council. Those who responded with option 3 tended to feel these forms of technology were destructive to the environment and landscape.

Officer commentary in response:

- Noted the most favoured approach regarding solar arrays and wind farms is to identify suitable areas within the district
- Noted the concerns of the perceived environmental impact and the visual impact.

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency consider that the plan contains many good statements, objectives and policy interventions regarding climate change and the natural environment. However, it could be bolder and more ambitious and requires a completed evidence base in several areas to ensure it helps to deliver sustainable and resilient development. This includes: preventing deterioration and restoring the water environment; ensure new development and existing communities are adapted to and resilient to the challenges of climate change and achieving biodiversity net gain informed by the local nature recovery strategy. • Devon County Council welcome the focus on climate change but would like more reference to and alignment with the Devon Carbon Plan. • This section is particularly welcome. Policy 34 regarding Embodied Carbon is welcome as it will hopefully lead to the reduction in the number of properties being demolished simply to build a grander replacement. • Exeter City Council support the emphasis in the plan on tackling the climate emergency and responding to climate change. They advise development of brownfield sites first should be a key element of the spatial strategy to help tackle the climate emergency, this approach is the Exeter plan. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noted the comment from Devon County Council and put more reference on the Devon Carbon Plan in the policy. • Support for net-zero and climate change policy noted • concern regarding sustainable transport, and it has been covered in the transport chapter in the local plan. • Concern regarding national grid infrastructure tech support noted. • Concern about Lithium-ion battery storage safety was noticed and added to the policy wording. • The flooding issue will be covered in Chapter 7b Topic paper • Plan references to the energy hierarchy will be looked at again and further review work • The links to transport matters raised and emission are noted. There is a separate transport chapter in the plan which will be refined. • Natural environment related matters are addressed through a separate plan chapter and are not seen to justify specific extra wording in this. • Through proposed redrafting it is considered that policies strike the right balance between encouraging development and protecting amenity, and other considerations. • The local plan does not seek to address matters that fall outside of planning controls.

- Exeter City Council welcome an emphasis on new and innovative forms of planning and delivery to ensure new developments, in particular any new settlements, are carbon neutral.
- Sidmouth Cycling Campaign state Figure 8, in this chapter, presents “The Energy Hierarchy” which forms the basis for interventions that developers will need to prioritise to ensure the net-zero target is met. The first and most important item on the hierarchy is “Development location: Minimise need to travel and provide access to sustainable transport”. We agree with this approach; however, there is no further reference to development location or transport in the remainder of this chapter, or how the developer will demonstrate their interventions towards net-zero.
- Exeter Cycling Campaign wish to see a section on how transportation (both public and private) will be decarbonised. Granted, transport is a Devon County competence, but the way development is designed greatly shapes the transportation choices people make.
- It is no longer acceptable to merely accept that ‘people will drive’. We need to be moving away from the ‘predict and provide’ model to a ‘decide and provide’ model for transport (and housing) design. With transport the most carbon-polluting sector the Local Plan would benefit from bolder measures that will nudge and enable different travel habits.
- We suggest that this chapter should include paragraphs after Figure 8 detailing how the items on “The Energy Hierarchy” will be addressed. For instance, Strategic Policy

1 directs development to sustainable locations and Chapter 11 prioritises sustainable travel.

- The Exeter Transport Strategy 2020-2030 is cited in the evidence base. The Local Plan would be improved by having greater alignment with this strategy. For instance, the Local Plan needs more detail in how to deliver one of the Transport Strategy’s key proposal: Park and Ride/Change: “Park & Ride sites on all key corridors will provide a realistic sustainable travel option for those trips from rural areas into the city that can’t feasibly be served by traditional public transport services”. All P&R planning should seek to ensure that P&R sites don’t actually induce additional driving. Under Policy 66 the Local Plan states that some sites/routes will be protected but these appear to be Exeter’s P&R sites, will ED identify additional ones.
- In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid’s infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.
- Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are

advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:

- a. whether the lines can be accommodated within the development site; or
- b. the viability and feasibility of diverting and/or undergrounding overhead lines.
- c. This includes, where relevant, ensuring the agreement of third-party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:
 - i. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
 - ii. Early engagement with NGED to establish whether its infrastructure can be

<p>accommodated within the development or whether diversion/undergrounding is feasible;</p> <p>iii. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.</p> <p>iv. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.</p> <ul style="list-style-type: none">• Devon Wildlife Trust consider that policies 29, 30, 31, 32, 37 and 38 should be reworded to include reference to the requirement for enhancement of our natural environment.• Should consider impact of helicopters on coastal erosion – make houses vibrate.• Plan needs to set out current thinking about where coastal defences will and will not be placed.• Not enough emphasis on flood mitigation – current drainage and sewage systems are unable to cope• How will extreme events be causing surface flooding be dealt with?• Otter Valley Association commend the use of an energy hierarchy and the policies on renewable energy and zero	
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carbon. The aim to be carbon neutral by 2040 is ambitious. Whilst solar farms are the most energy efficient, use of all new roofs for solar power should be a requirement. Also retrofitting large industrial and employment buildings would help to protect the best agricultural land needed for food production.

- National Farmers union has a target for the agricultural vision for the farming industry to be Net Zero by 2040, which aligns with the target for East Devon. The farming industry has a key role to play in delivering this aspiration.
- Lyme Regis Town Council support the commitments to carbon neutrality, and renewables but think more should be done about the impact of transport in general and visitor transport in particular. The Town Council suggest that developer contributions could be made towards mitigation measures.
- Hawkchurch PC –
 - As drafted the policies on renewable energy do not correctly reflect the balance given in the National Planning Policy Framework (NPPF) or in the supplementary planning guidance on renewable and low carbon energy. They do not give sufficient weight to the adverse impacts, give no weight to cumulative impacts (which is contrary to the guidance) and do not reflect the need to take into account the views of local communities likely to be affected by them. In addition, they do not reflect the need to identify opportunities for co-location of supplies and consumers. We are seriously

concerned that the wording of the energy storage policy does not take into account the national guidance.

- We have noted that other local authorities have used the criteria that renewable developments ‘do not have an overshadowing or overbearing effect on nearby habitations’ and in the case of solar development that the ‘noise, glint and glare is mitigated adequately’. We would welcome inclusion of such terminology in policies 29 -32 as this would help protect the beauty of East Devon and prevent adverse impacts on both communities and wildlife.
- Hawkchurch is particularly experienced in relation to energy installations with numerous solar farms. We now face multiple applications for large scale industrial storage facilities, which are likely to be Lithium-ion battery storage. This is primarily due to the location of the National Grid Substation which is due to expand its connections. When surveyed 85% of households said they regard Lithium-ion battery storage as unsafe. Furthermore 85% of households also felt that such installations were industrial in nature and should only be permitted with strong controls on safety and impact – including the cumulative impact over time and coupled with solar farm development.
- We recognise the need for energy storage but believe EDDC should be considering the district good from locally generated or stored electricity

<p>versus supporting the national interest (e.g. storing energy which will ultimately be used elsewhere in the country). By encouraging storage, and where possible generation, to be co-located with heavy consumers (be it industry, residential, hospital etc) it would make certain that the benefit is within the district.</p> <ul style="list-style-type: none"> • While we recognise that the local plan is primarily concerned with planning controls, the energy and climate change strategy take no account of the need to improve the condition of homes. A significant number of respondents to our survey said that they would have solar panels if they were affordable. Some are trying to get solar panels but there is a shortage of suppliers and there appears to be a lack of interest in small scale deployments. It would be helpful if the strategy could cover these aspects and enable real changes to residents. • Barratt Homes note that the evidence base for the policy is more than 2 years old and suggest that a policy that goes beyond the Building Regulations is not necessary or justified. 	
Supplementary Regulation 18 consultation Spring 2024	
<ul style="list-style-type: none"> • Not included in this consultation. 	<ul style="list-style-type: none"> • No comments.
Commentary on policy redrafting for the Publication Plan	
No additional policies are required as a result of general issues raised on Chapter 11.	

Strategic Policy 27 – Climate Emergency	
East Devon District Council declared a climate emergency where it committed to become carbon neutral by 2040. The policy listed East Devon's targets on climate change and carbon neutrality.	
Issues and options consultation	
<p>Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes. We asked if people agreed with these and 59% of respondents answered yes.</p> <p>Although most respondents ticked the yes box a number did suggest other objectives as well as did many that ticked the no box.</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Support noted.
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency advise that this policy focuses on reducing emissions but does not include any provisions requiring adaptation/resilience to those changes. adapting and becoming resilient to the many impacts of climate 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Resilience to climate change considerations are addressed through other policies in the plan.

change is just as important as reducing carbon emissions and is an area where local planning authorities have more control. Resilience to climate change is about more than just adapting to increased flood risks. For example, it should include providing space for nature to adapt. Within the East Devon local plan this should include space for the Exe Estuary SPA/RAMSAR, and Axe SAC. The River Otter is also particularly unstable, with threats to the built environment including at Cadhay, Ottery St Mary, Tipton St John, Harpford, Newton Poppleford, with these processes liable to increase as a result of climate change.

- South West Water recommend additional criteria to minimise water consumption.
- Devon County Council (DCC) recommend incorporating the need to reduce emissions by 50% by 2030 from 2010 levels, and to add bullet points relating to 20-minute neighbourhoods and the principle of One Planet Development.
- DCC note one of the best ways to help the climate emergency is to reduce the need to travel – query whether a new community helps with this given no facilities from day one.
- Vital that all development should be of the highest energy efficiency.
- Newton Poppleford and Harpford Parish Council think that all schemes should meet this policy.
- Clyst Honiton Parish Council agrees with the direction, but believes that all development policies must reflect the need to achieve net zero carbon emissions by 2040.

- Suggestions from South West Water regarding minimising water consumption were noted and addressed elsewhere in the plan.
- 20-minute neighbourhoods issue responded to in another topic paper - Transport
- DCC's concern on the new community should have facilities from day one noted.
- General support for carbon neutrality was noted.
- Concern regarding EDDC set its standards noted, and refer to the Future Home Standard 2013 and the upcoming 2025.
- Mixed comments on the council's passive/active approach were noted.
- Policy wording is too restricted, noted and agreed. Amendment applied

Development proposals agreed in the 2020s will not usually come to fruition for 5 years, so there is not much time to make a difference. District Heat Networks must be powered by green energy, not fossil fuels.

- The Local Plan falls short of its aim of delivering “a suite of ambitious and implementable policies which addresses the severity of the [climate] crisis that we are all facing”. We believe the Local Plan would benefit from bolder and more explicit measures to enable low/no carbon transport and nudge citizens away from single-occupancy private vehicles.
- Home Builders Federation generally supports EDDC in seeking to become carbon neutral, delivering net zero development and maximising opportunities for renewable energy.
- Home Builders Federation considers it is not appropriate for EDDC to set its own standards. It adds to the complexity of policy, regulations and standards that housebuilders already must comply with. It undermines economies of scale for product manufacturers/ suppliers/developers if Councils’ policies are not standardised. Policy exceeds Level 4 of the Code for Sustainable Homes and conflicts with March 2015 Written Ministerial Statement and PPG. Difference between national and local requirements has been held to be unsound
- Housing Association planning consortium agrees with policy. But EDDC should be wary of the ways the policy

could impact on development viability which may restrict the provision of affordable housing in East Devon

- Agents for Bloor Homes support net zero ambitions but advise that whilst the development industry is moving at pace to net zero, huge advances in supply chains and technologies are required to deliver net zero buildings. It is important that these challenges are recognised in draft Policy and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe.
- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- Proposed new motorway service on the M5 north of Exeter would be consistent with this policy.
- Unclear what “maximising” means and how this can be secured and balanced alongside other policy considerations – more appropriate to use the term “optimise”.
- Greenslade Taylor Hunt, for a client, advise - whilst the principle of moving to a low carbon or carbon neutral society is supported, it should not be at the expense of compromising development viability, or go beyond the already stringent requirements of the Building Regulations. Policy 27 should be amended to clarify that carbon neutral

<p>development should be an aspiration and not an absolute requirement.</p> <ul style="list-style-type: none"> • Sidmouth Arboretum - <ul style="list-style-type: none"> ○ Currently, many organisations are planting new trees, woodlands and hedgerows to offset carbon emissions. Providing, transporting and actually planting these whips has a carbon cost and these plantations will not have grown enough to move into positive sequestration for a number of years. Retaining a mature tree will contribute to carbon sequestration immediately and a healthy mature tree will sequester more carbon than many whips. ○ Policy 27 stresses the importance of retaining existing buildings. It would strengthen the policy if it had a fourth action, retaining existing mature trees and hedgerows where possible. • Council's passive approach to addressing the climate emergency is disappointing. Council should take urgent action, such as requiring insulation for all full-time residences and increasing taxes on second homes and Airbnbs. EDDC should also involve local people in managing energy supplies. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> • Not included in this consultation. 	<ul style="list-style-type: none"> •

Commentary on policy redrafting for the Publication Plan
Redrafted policy title: <ul style="list-style-type: none"> • Strategic Policy CC01 – Climate Emergency
Amended the terms to low carbon and renewable energy in line with other policy Deleted policy wording point c as already covered by policy CC06

Strategic Policy 28 – Net Zero Carbon Development	
Policy set out requirements for development to deliver and monitor net-zero development.	
Issues and options consultation	
<p>In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. We asked about which approaches we should favour.</p> <ul style="list-style-type: none"> • Option 1 – Plan for net-zero carbon from plan adoption • Option2 – Plan for net-zero carbon from a future date • Option 3 – Do neither of the above and not have a policy? <p>Slightly more people supported planning to ensure net zero carbon in new developments from a future date as opposed to</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noted option 2 - Plan for net-zero carbon from a future date has slightly more people support. • Concern regarding the feasibility noted. • Concern net-zero policies would compromise the delivery of affordable housing noted. • Concern regarding EDDC setting its standards noted and referred to the Future Home Standard 2013 and the upcoming 2025.

<p>from plan adoption – 43% to 37%. 10% of respondents felt we should either not have a policy or take a different approach.</p> <p>People who responded with option 2, whilst feeling that the issue was important, often expressed concern over the feasibility of the target date proposed in option 1 and feared that too ambitious a target would compromise the delivery of affordable housing. Those responding with option 1 commonly stated that the climate crisis needs to be taken as seriously as possible now and that the development industry has had a lot of time to adapt already. Respondents choosing option 3 often felt that central government should take the lead on this matter rather than having fragmented local policies.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency welcomes this policy and are pleased to see a requirement for new homes to be future proofed to avoid temperature discomfort as a result of rising temperatures. That is just one way in which new homes (and new development more generally) need to be designed differently to be resilient to climate change and help to achieve net zero carbon emissions. Achieving the ambition for Net Zero will require new development to incorporate things like grey water reuse, onsite energy generation, efficient insulation, green roofs, garden water 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noted DCC supports the policy and suggestion for stronger measures to reduce embodied carbon emissions. Agree, and add the carbon emission reduction standard to the policy. • Policy has been redrafted to rely on application of future Building Regulation standards – noting that, on balance, seeking to exceed these standards is complex, generates viability concerns and generates limited net additional positive outcomes when compared against other plan initiatives and policies. (not that a number if respondents raised concerns around standards). • General support noted.

storage, SuDS which are beneficial for natural conservation and water quality.

- South West Water believe a similar policy should be included to require an assessment of annual projected water use to demonstrate the water reducing measures.
- Devon County Council (DCC) support calculation of whole-life cycle carbon emissions but should go further to expect developers to reduce embodied carbon emissions (we highlight Mid Devon's current work on this) - cross-refer to Strategic Policy 34.
- DCC state there is little reference to retrofitting existing housing stock to ensure it can reduce carbon impact.
- Newton Poppleford and Harpford Parish Council consider that this policy should be implemented as an integral part of new development. New developments should also create their own energy to avoid the need to instal more wind and solar farms.
- Clyst Honiton Parish Council believes that the policy is not strong enough. It does not sound like a requirement, but rather a suggestion. The policy needs to be made more specific and enforceable.
- Whilst the Council may need to apply innovative and ambitious measures in order to reach its carbon neutral goal, the policy and supported text as worded is in excess of national standards and places a burden on residential development to achieve this. Given that the carbon neutral target is at the end of the plan period, a cascade approach could help developers with a period of transition to more stringent requirements.

- Suggestion to make the requirements for the carbon statement and Whole Life Cycle Carbon Assessment proportionate to the size and complexity of the proposed development. Agreed and changed the policy wording.
- Noted the challenge for EDDC's advice that to require all development to deliver in advance of 2040 is not consistent with national policy. East Devon as council has declared a climate emergency where it committed to becoming carbon neutral by 2040.
- Require details about whole life cycle carbon assessments and concern about lack of viability testing. Agree, updated the detail requirement for the Whole life cycle carbon assessment in Policy CC06.

- In terms of energy performance and monitoring, the Council should work with developers on a mutually agreeable approach. The current suggestion of energy performance data on 10% of dwellings would be extremely difficult to implement, especially once dwellings are occupied and no longer under the control of the developer. Therefore, it may be more appropriate for the Council to work with volunteering residents in gathering data.
- The scope of the desired deliverables should not undermine the deliverability of viable development. The wording of draft SP28 presents the identified requirements (carbon statement and Whole Life Cycle Carbon Assessment) as all having to be satisfied/addressed as a prerequisite for major development to be supported. The detail to be expected in these statements should be proportionate to the form of a future planning application.
- Home Builders Federation has concerns that EDDC is setting its own standards above those set nationally. Adds to development cost and complexity, which may lead to issues for house builders. May have viability implications. How will the policy be monitored? Much of the responsibility for emissions is outside the homebuilding industry's control How will the policy interact with other policies on energy efficiency or resilience to heat, as well as viability and deliverability.
- Home Builders Federation -Policy should not apply to all developments, and should recognise scale of development in relation to the policy's requirements

- Housing Association planning consortium agrees with policy. But EDDC should be wary of the ways the policy could impact on development viability which may restrict the provision of affordable housing in East Devon
- Bloor Homes support policy objectives but raise concerns around issues of detail, they specifically advise that policy should follow the Government definition of net zero
- Barratt David Wilson Homes assert there is a clear disconnect between Policy 28 and Government's forthcoming Building Regulations and policy. Policy 28 needs to be subject to Viability assessment.
- Barratt David Wilson Homes – queries whether policy serve a clear purpose regarding consideration of temperature discomfort as this is controlled by Building Regulations
- Barratt David Wilson Homes question whether it is possible to implement the requirement for the in-use performance of a building to be as close to its design intent as possible. BDW have already queried the implementation of a similar policy at Cranbrook eg how a developer can compel a homeowner to provide the information. How the LPA will process/manage the information. And implications for homeowners if remedial action is needed. BDW consider that the Building Regulations process is sufficient
- Agents for Bourne Leisure challenge advise that to require all development to deliver in advance of 2040 is not consistent with national policy. Amongst other matters they advise that the term 'commercial' referenced in the draft policy is not defined in the plan, but the context in which it

is used in the plan suggests that it does not cover tourist accommodation and facilities. This is helpful as it would not be possible to provide carbon statements or Whole Life Cycle Carbon Assessments for caravans. For the avoidance of doubt, it would be helpful for the emerging plan to clarify that such assessments will only be required where it is feasible to do so.

- CG Fry supports principle, but objects to mandatory provisions and seeks to include viability considerations in policy.
- Site promoter query need for policy when better considered through the building regulations. More clarity is required about whole life cycle carbon assessments and concern about lack of viability testing.
- A developer is concerned that the evidence base is already more than two years old and was prepared for GESP rather than East Devon specifically.
- Developer has concerns that the policy goes beyond existing Building Regulations standards and the Future Homes Standard.
- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- Proposed new motorway service on the M5 north of Exeter would be consistent with this policy.
- Include a transition period for delivering net-zero up to 2040 so developers can adjust to these higher standards.

- Allow more flexibility in the policy to allow the use of new local carbon and renewable energy technologies that emerge over the plan period.
- Does not explain what the delivery of net-zero carbon emissions means or when/how this will be achieved.
- No need to refer to homes being ‘future proofed’ to avoid temperature discomfort as this is already covered by Part O of the Building Regulations.
- Are the Council setting up a finance scheme towards off-site carbon reduction measures? Otherwise not clear how this would work in practice.
- For a client Greenslade Taylor Hunt advise policy should not be at the expense of compromising development viability, or go beyond the already stringent requirements of the Building Regulations. The requirement for major developments to provide calculations for the whole life-cycle carbon emissions through a nationally recognised whole life cycle carbon assessment is disproportionate and adds an additional unnecessary burden to the planning process.
- Morrish Homes supports the principle of moving to a low carbon or carbon neutral scenario. However, this should not be at the expense of compromising development viability, or going beyond the already stringent requirements of the Building Regulations.
- EDDC should relax planning rules for small wind turbines to boost renewable energy and reduce reliance on fossil fuels.

- Solar panels should be required on all new builds, including industrial and office buildings.
- The goal of net-zero carbon emissions is unrealistic and unattainable through renewable energy programs.
- Preference should be given to installing solar panels on existing and new buildings, rather than building them on farmland.
- The policy places too much emphasis on prioritizing "renewable energy" especially in regard to battery storage.
- The quest for 'net-zero' is undeliverable and bogus if delivered through 'renewable' energy, the technological production and maintenance of which is a major cause of pollution, fossil fuel use and environmental damage.
- 2040 is far too late. We need action now if we are to prevent human extinction at our own hands. It should be brought forward to 2030 and the term "net zero" should be replaced with "zero carbon".
- Climate change deniers are akin to flat earthers or 18th century slave owners and should not be given a platform.
- What scientific evidence do you have that the climate is in crisis and that justifies declaring a "climate emergency"? What are the costs of implementing Strategic Policy 27? What is the probability that East Devon will become carbon neutral by 2040? Will the carbon emissions be displaced to other parts of the world, e.g. China?
- The policy is too broad. It is important to distinguish between activities which genuinely assist with climate change and others which will fall within this policy but are either adverse or not as beneficial as they might be. It

<p>should be more measured and balanced, and less hysterical.</p> <ul style="list-style-type: none"> • The support given to maximising opportunities for the delivery of energy storage facilities is supported. However, it remains to be seen how this overarching support will be balanced should schemes for employment development for example propose to apportion some land for this use. • Policy should include much stricter building requirements to meet renewable energy requirements and require all new buildings to incorporate solar panels or high-quality insulation standards. • Policy should set numerical limits on actual construction emissions. • The policy should abandon vanity projects like Seaton Jurassic and Blackdown House and shift investment towards improving the footpath networks, maximising public open space for humans and wildlife, and protecting our countryside from inappropriate housing estates. • The Local Plan Viability Assessment should allow for an uplift in build costs for delivering net zero embodied carbon. 	
Supplementary Regulation 18 consultation Spring 2024	
<ul style="list-style-type: none"> • Not included in this consultation. 	<ul style="list-style-type: none"> • No comments.
Commentary on policy redrafting for the Publication Plan	

<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Strategic Policy CC02 – Zero Carbon Development
<p>Change policy wording to align with the requirements and standards outlined in the Future Homes Standard (FHS) & BREEAM. Removed the “Whole life cycle carbon assessment” requirements from CC02, as covered in policy CC06.</p>

<p>Strategic Policy 29 – Promoting renewables and zero carbon energy</p>	
<p>Policy promotes low carbon and renewable energy</p>	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency support this policy and welcome the requirement for proposals to not have unacceptable impacts on water and biodiversity, and that non-renewable forms of energy generation will only be considered once all alternatives have been exhausted. • National Farmers Union state Renewable energy has a key role on farm, both in making a business energy resilient in its own right and in some situations also providing energy for wider society. One of the barriers that exists that has limited take up in some situations are limitations in the grid network and although not strictly part of the Local Plan, we 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Concern regarding environmental impacts including, Negative impacts on wildlife and natural beauty, Impact on agricultural land and Landscape and visual impacts. Policy wording was amended to address to concern. • Concern regarding Community Engagement and Local Concerns noted. And amended the policy: Community involvement is essential, early discussions with local residents should be in place, and the development plan should reflect these discussions. • Concern regarding policy implementation noted. officer will look further into this matter. • Concern regarding National Grid limitations noted.

<p>would encourage East Devon District Council to do what ever it can to encourage investment here to increase the amount of renewable energy that can be delivered.</p> <ul style="list-style-type: none">• Devon County Council (DCC) suggest adding reference to the document ‘A Clean Growth Vison for Development in the West of East Devon’.• DCC suggest referencing the Devon Carbon Plan that eight times more renewable energy capacity is required in Devon.• Newton Poppleford and Harpford Parish Council state that the word ‘unacceptable’ is not defined and think that schemes should only be approved with the support of the community.• Lyme Regis Town Council worry that constraints may limit opportunities for renewable and zero carbon energy generation and would welcome the opportunity for dialogue about the delivery of cross-border community level local generation schemes.• Hawkchurch Parish Council suggest the benefits of co-location of energy generation and consumers can be promoted by adjusting the wording of Strategic Policy 29. This policy should also include reference to cumulative landscape and visual impact. Specific wording included in representation.• National Highways endorse the mention of ‘highways’ as a requirement for no unacceptable impacts.• Agents for Bourne Leisure advise that they welcome the approach in the draft plan to promote renewables and zero carbon energy. In line with the approach taken for	<ul style="list-style-type: none">• Concern regarding future food security. Noted, policy wording amended to address. Any farmland that is used allows for the continuation on the site of some form of appropriate agricultural activity or bio-diversity use proportionate to the scale of the proposal;
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residential amenity, draft policies 29, 30 and 31 should be amended to provide adequate amenity protection of other sensitive uses, including visitor accommodation, to ensure that any adverse impacts are mitigated. This would ensure the draft policies are consistent with paragraph 158(b) of the NPPF, which does not restrict the protection of impacts to only residential amenity. The need to protect visitor amenity is crucial given the importance of tourism to East Devon's economy

- Clyst Honiton Parish Council supports the goals of policies 29-31, but believes that they are not written in a way that is likely to encourage compliance. The exceptions listed in the policies are general requirements for all development, so there is no need to specifically state them in the policies.
- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- EDDC has approved over 100 acres of solar arrays in Hawkchurch, a stunningly beautiful area with immense landscape and biodiversity value. This has led to concerns about the impact on the area's landscape, biodiversity, and health. Residents should have a say in what developments are acceptable in their area.
- The policy encourages community-led schemes but lacks guidance. EDDC should focusing on community-led

schemes to achieve net zero. More examples and guidance would be helpful.

- Protect agricultural land for future food security. Assess Grade 1, 2, and 3a land quality before supporting renewable energy schemes.
- East Devon should be safeguarded from fracking.
- The new energy strategy makes it difficult to get planning permission for renewable energy projects. The strategy requires renewable energy projects to show that there are no other options available and allows for plenty of scope to object to any zero-carbon or renewable intent.
- Renewable energy is not always zero-carbon. East Devon should support genuine low carbon developments (such as Small Modular Reactors) in other regions and assess the carbon emissions of all renewable energy proposals.
- Renewable energy is a key part of the solution to climate change, but it needs to be paired with energy storage to ensure that it is reliable and affordable.
- Exmouth Town Council supports zero carbon and renewable energy schemes but wants to clarify the policy wording to ensure that unacceptable impacts are clearly defined. Exmouth Town council also wants to reference geodiversity in the policy and make a strong statement about not supporting fossil fuel driven solutions, unless absolutely necessary.
- The term "unacceptable impacts" has not been clearly defined, which is concerning. There is a risk that this could be interpreted as allowing any development, regardless of its impact on the environment.

<ul style="list-style-type: none"> • I support solar and wind farms over nuclear energy, which is not green and takes years to dismantle. • We need to adapt our views on landscapes as they are not static and have changed throughout history. Onshore wind and solar are vital, and if we don't act now, the landscape will change drastically due to climate change. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Not included in this consultation.</p>	<p>No comments</p>
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Strategic Policy CC03 – Promoting low carbon and renewables energy 	
<p>The new Combined Policy CC03 replaces Policies 29, 30, and 31. It encompasses low-carbon and renewable energy, incorporating provisions for, policy flexibility and environmental protection.</p> <p>Key improvements:</p> <p>Combined policies: Merged three policies into a single, comprehensive policy.</p> <p>Expanded scope: Included provisions for flexibility, and environmental protection.</p> <p>Enhanced clarity: Improved the overall clarity and structure of the policy.</p> <p>This revised version provides a more concise and effective summary of key considerations.</p>	

Strategic Policy 30 – Suitable areas for solar energy developments	
The policy identified suitable area for solar energy development in East Devon	
Issues and options consultation	
<p>Question 6 sought views on the approach we should take in respect of solar arrays and windfarms.</p> <ul style="list-style-type: none"> • Option 1 – Identify suitable areas for renewable energy developments • Option 2 – Not identify areas but offer general support • Option 3 – Take a more restrictive approach to renewables • Option 4 – None of the above <p>The most popular option by far with 60% support was for us to identify suitable areas for solar and wind energy. 16% of people felt we should offer general support and just 6% felt we should take a more restrictive approach. 5% of respondents felt that none of the options were suitable.</p> <p>Many who responded with option 1 felt it was very important to encourage renewables whilst protecting the most important areas in the district like the AONB. Despite this, there was considerable</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Support noted. • Support for Small scale generation noted.

<p>concern over the potential visual impact of both technologies, even from those who responded with option 1. Some who responded with option 2 felt that a more flexible approach was needed, taking into account the local populations views and the Town Council. Those who responded with option 3 tended to feel these forms of technology were destructive to the environment and landscape. Those responding with option 4 provided a variety of comments, some which are covered below.</p> <p>Other common comments (specific to solar) included:</p> <ul style="list-style-type: none"> • Need to encourage solar energy brownfield land and new builds first over greenfield. • Solar panels offer the potential to enhance biodiversity when done innovatively • Small scale generation is also important and should be encouraged • Should encourage multi-use of solar farm land and protect most productive agricultural land. 	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency advise that many of the areas shown on maps as suitable for solar development are within areas at risk of flooding. They are satisfied that the requirement for ‘no unacceptable impact on water’ is 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Concern regarding environmental impacts including Negative impacts on wildlife and natural beauty, Impact on agricultural land and Landscape and visual impacts. Policy wording was amended to address the concern. 1. The balance of the wider environmental, social and economic benefits of low carbon & renewable energy, heat and/or fuel production, energy storage and distribution; and 2. No significant

sufficient to protect functional floodplains. The nature of solar development means that natural flood management and floodplain improvements can be easily implemented alongside development with little to no negative consequences.

- Woodbury Parish Council state that solar and wind farms are important but should not negatively impact on wildlife or hinder areas of natural beauty.
- National Farmers Union state Renewable energy production is a core part of the NFU's net zero plan and solar projects often offer a good diversification option for farmers. However, there is a need to strike a balance between food security and climate ambitions. It is important that large scale solar farm development is located on lower quality agricultural land or brownfield sites, avoiding the most productive and versatile soils. Utilising roofs and farm buildings for solar should also be incentivised as it delivers a sustainable method of energy production while avoiding any land use conflict and is the NFU's preferred approach.
- The Avenues Residents Association goes further by stating - the NFU clearly identifies that this country should be maximising production of food using existing farming capacity, but that in fact we are already short of production capacity, so clearly sacrificing farming land for solar panels makes no sense, and is both immoral and irresponsible
- National Highways endorse the mention of 'highways' as a requirement for no unacceptable impacts.

adverse impacts on the local environment that cannot be satisfactorily mitigated, including individual and cumulative landscape and visual impacts

- Concern regarding Community Engagement and Local Concerns noted.
- Concern regarding policy implementation noted. The officers will look further into this matter.
- Considerations in respect of agricultural land and buildings are noted.

- National Highways request additional supporting text to include matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic) in locations alongside the strategic road network.
- Devon County Council (DCC) feel there should be a more positive approach to domestic generation and energy saving in new builds, existing buildings, and car parks, rather than using high quality farmland which also has adverse landscape impacts.
- DCC recommends adding further detail on landscape impact by having regard to the intrinsic character and beauty of the countryside, located in least environmentally sensitive locations, well designed and integrated into the landscape, enhance landscape character and biodiversity. Add reference to Devon Landscape Policy Group Advise Note 2.
- Summerfield Planning Ltd on behalf of landowner state there is no intention to use site Clge_18 for solar development so it should be removed from the Policies map.
- Support identifying permissible sites for solar energy to tackle climate change and to make energy cheaper – must call for land to identify sites.
- Exmouth Community Associations advise - we strongly object to the proposal that areas on the very edge of Exmouth are suitable for solar energy production, especially the Maer Valley which our Neighbourhood Plan earmarks for the creation of a Valley Park.

- New policy working in the plan highlights landscape concerns.
- The intent is to not show areas suitable for solar generation on the Policies Map, rather reliance to be placed on criteria based approach.

- Barratt Homes considers that the areas identified should not be prohibited from delivering other types of development.
- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- The National Trust support policy in principle but is concerned with the extent of the district which has been identified as ‘Areas considered suitable for solar energy’ as set out on the policies maps. Concern is raised around not taking into account listed buildings or their settings, noting that policy wording changes could be appropriate. Policy changes should reflect to importance of heritage assets and their setting noting adverse impacts that solar farms can have.
- All new builds should come with solar panels, greywater systems while avoiding fossil fuels for heating. This would reduce the impact of new homes on the environment, reduce our reliance on fossil fuels and make homes more efficient to run. I would like to see more homes built to the Passivhaus levels of efficiency.
- Post-build monitoring and enforcement: The council should set up a timetable and methodology for independent monitoring of new developments to ensure that they meet the net-zero carbon goals. The council should also have an explicit program of immediate action if the goals are not met.

- there is no evidence that a proposed 'whole life cycle carbon assessment' will take on board the full impact of the rare minerals and metals required to produce solar panels and wind turbines and the battery energy storage referred to in 27.
- Whole life cycle carbon emissions should also apply to policies in this section relating to solar, wind and storage.
- The Devon Carbon Plan says that local authorities should gather and keep information as a local evidence base, which will help demonstrate that it is financially viable to build net-zero carbon homes.
- The strategy of building net-zero carbon homes is an absolute necessity, as it helps in keeping energy costs down, making present and future resources more cheaply available, and will result in a subsequent reduced dependency on climate damaging fossil fuel extraction and burning.
- New connection to the gas grid must be stopped.
- The principle of moving to a low carbon industry is supported, but it should not be at the expense of compromising development viability or going beyond the already stringent requirements of the Building Regulations.
- Strongvox Ltd believes that the policy of requiring all new residential and commercial development to be net-zero carbon emissions is unsound. They argue that the policy is not realistic or achievable, and that it would add an unnecessary burden to the planning process. They recommend that the policy be stepped in line with

government targets and requirements, or that it be deleted altogether.

- Morrish Homes supports the principle of moving to a low carbon or carbon-neutral scenario, but not if it compromises development viability or goes beyond the Building Regulations. They believe the policy is unsound and should be amended to clarify that carbon-neutral development should be an aspiration, not an absolute requirement.
- Exmouth Town Council supports the policy of maximizing opportunities for renewable energy in new residential development. However, they have concerns about the clarity of the policy and the potential implications for air-conditioning installations. Specifically, they are concerned that the policy does not specify whether it applies to all new residential development or only development sites above a certain size. They are also concerned that the policy does not define what is meant by "maximizing opportunities" for renewable energy, and that it does not clarify whether air-conditioning installations are allowed.
- Islandwide Limited supports the principle of moving to a low carbon or carbon-neutral scenario, but they believe that the policy is unsound because it could make development unviable and go beyond the requirements of the Building Regulations. They propose that the policy be amended to clarify that carbon-neutral development should be an aspiration, not an absolute requirement.
- The local plan feels like a developer-led plan, which is a concern because developers are motivated by profit and

may not be willing to invest in net-zero housing. EDDC should take control of the plan and require developers to build to Passivhaus standards, which would make homes more energy-efficient and reduce carbon emissions.

- This is political nonsense and has no place on a formal consultation.
- Net-zero carbon, and biodiversity-sustaining credentials should be the baseline consideration for all new development. Buildings need to be put in place that are net-zero carbon, and to take opportunities for energy schemes.
- There is a lack of good examples of net-zero development. The council should provide examples of net-zero development so that developers can see what is possible.
- There should be an explicit statement on environmental standards. The council should make it clear that all new houses must meet minimum environmental standards, such as having solar panels and EV chargers.
- EDDC needs to have the power to ensure that developers comply with the policy's requirements and to be strict monitoring of developers to ensure that they meet net zero carbon emissions.
- Net-zero development should be more affordable, such as providing financial incentives to developers.
- The policy should not include air conditioning. Air conditioning is a major source of carbon emissions, and it should not be included in the policy.

- Policy 30 should be ambitious and should not be afraid to set high standards. EDDC should be willing to take a leadership role in the fight against climate change.
- The idea of zero carbon is unrealistic, as all life on Earth is carbon-based
- More emphasis needs to be added to being British Made.
- EDDC should mandate a high and objectively quantifiable level of certification for both building and performance, as well as enforcing the overall net-zero requirement. The council should not allow developers to sidestep high performance building standards by adding solar panels to offset a house's poor performance.
- East Devon's solar policy is harming the local economy and environment. Solar farms on farmland are unsightly, reduce crop yields, and make it difficult to access land for grazing or other agricultural activities. Solar farms should be built on developed land instead, where they can help to reduce the amount of energy that is imported from other countries and create jobs in the local area.
- To ensure a sustainable future, we must invest in renewable energy sources such as wind and solar power. These sources are clean, abundant, and reliable, and they will help us to reduce our reliance on fossil fuels.
- The allocation of land for solar power has not been properly considered. Land that is adjacent to existing homes, north-facing, forested, or shaded should not be considered as suitable. Some land must be reserved for food production, environmental benefit, and amenity use.

<p>Land adjacent to Ridgeway in Colyton should be excluded as it would increase flooding risks for the town.</p> <ul style="list-style-type: none"> • The policy should promote the use of commercial rooftops for solar energy generation, such as the installation of solar panels on warehouse roofs. • Solar farms can increase biodiversity by planting wildflowers, hedgerows, and trees. Developers should include these measures in planning applications and ensure they are implemented and maintained. • Exmouth Town Council Members have concerns about the solar policy map, which shows all permissible areas instead of restricted areas. They also feel that the policy should reference domestic uses of solar energy, such as water heating and solar thermal. • This policy is not included on the policies map. • The policy map designates a vast area of East Devon as suitable for solar energy, but this is too broad. A more targeted approach is needed, eliminating areas near settlements or in highly visible locations. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Not included in this consultation.</p>	<ul style="list-style-type: none"> • No comments
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Policy is deleted - see new CC03.</p>	

Strategic Policy 31 – Suitable areas for wind energy developments	
Policy provided for wind energy development proposals.	
Issues and options consultation	
<p>Question 6 sought views on the approach we should take in respect of solar arrays and windfarms.</p> <ul style="list-style-type: none"> • Option 1 – Identify suitable areas for renewable energy developments • Option 2 – Not identify areas but offer general support • Option 3 – Take a more restrictive approach to renewables • Option 4 – None of the above <p>The most popular option by far with 60% support was for us to identify suitable areas for solar and wind energy. 16% of people felt we should offer general support and just 6% felt we should take a more restrictive approach. 5% of respondents felt that none of the options were suitable.</p> <p>Many who responded with option 1 felt it was very important to encourage renewables whilst protecting the most important areas in the district like the AONB. Despite this, there was considerable concern over the potential visual impact of both technologies, even from those who responded with option 1. Some who</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noted the support for Identify suitable areas for renewable energy developments. Would include relevant evidence in the evidence base.

<p>responded with option 2 felt that a more flexible approach was needed, taking into account the local populations views and the Town Council. Those who responded with option 3 tended to feel these forms of technology were destructive to the environment and landscape. Those responding with option 4 provided a variety of comments, some which are covered below.</p> <p>Other common comments (specific to wind) included:</p> <ul style="list-style-type: none"> • Off-shore wind is most suitable over on-shore • Wind arrays can become tourist destinations • Need to consider co2 emissions from the construction and life cycle of wind 	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Woodbury Parish Council state that solar and wind farms are important but should not negatively impact on wildlife or hinder areas of natural beauty. • National Farmers Union believe that the recent policies on wind development and what is currently proposed in the emerging Local Plan is too restrictive and skewed towards the concept of 'large scale wind farms. The Low Carbon Study has made this same mistake and only mapped areas suitable for 500kW and above. Recent reports, such as the Devon Carbon Plan show an acceptance of wind by the public and it is important planning policy catches up with this. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Concern regarding wildlife and environmental impact noted. Policy wording was amended to address the concern. • Concern regarding the policy on wind energy being too restrictive was noted. And proposed a more general and clear policy for low-carbon and renewable energy. • Concern regarding Grid infrastructure noted. The officer will consult National Grid for further comments.

- There is a clear role and ability for farm businesses to install small turbines (20-50kW) and with the wind speeds in many areas could easily contribute 50,000kWh/year. This, when combined with solar could make a farm businesses energy independent, not only helping to secure its financial future, but also taking pressure off the grid and at certain times allowing it to provide energy back to the grid (where grid infrastructure allows). We accept the concern and need for 'large on shore wind farms' to be controlled
- Hawkchurch Parish Council suggest the following rewording 'Landscape, visual or residential amenity (including cumulative landscape and visual impacts);'
- National Highways endorse the mention of 'highways' as a requirement for no unacceptable impacts.
- National Highways request additional supporting text to include matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic) in locations alongside the strategic road network.
- Devon County Council suggest removing "where landscape sensitivity has been identified as being low/moderate/moderate" as this depends upon the size and number of turbines and refine the suitable areas using a landscape sensitivity assessment approach.
- Support identifying permissible sites for wind energy to tackle climate change and to make energy cheaper – must call for land to identify sites.
- For clients Greenslade Taylor Hunt advise the use of energy storage facilities is encouraged. However, the

- Suggestion for adding policy provisions for the decommissioning of windfarms, and the reuse of land after wind turbines are removed. Agreed, add policy wording to cover this point.
- Areas of search are retained in policy as we are applying the draft of the NPPF that states that areas for turbines should be shown in plans.

binary approach to not permit this development where it is in direct conflict with any policy in the plan that allocates land for a different specified use is not sound. There needs to be leniency written into the policy to allow energy storage on sites that have been allocated for other uses

- Buckerell Parish Council are concerned that identifying land suitable for solar development indicates a presumption in favour of such development. The area of search should be replaced by a criteria-based policy especially relating to sensitive landscape areas/important views
- Exmouth Town Council Members support the policy, but they believe that it should also mention the potential for micro and domestic wind turbines, as well as offshore wind energy.
- Policies that allow domestic wind turbines to be built on all domestic dwellings should be encouraged.
- Wind energy and solar power should be concentrated in areas like Exeter Airport, which is a loss-making, polluting site with a large amount of unused land. This would free up green belt land for other uses and create a more sustainable future.
- Wind farms and solar panels are unlikely to be welcome in most parts of our district, especially within AONB
- It is essential to educate communities about how the visual impact of wind and solar infrastructure is a minor cost when compared to the benefits of helping to address climate change.

- Onshore wind energy will have to play a part in electricity generation, even though it has some drawbacks. The climate emergency requires emergency measures, which may have impacts on landscape and visual amenity. People's concerns about their visual impact should be secondary to the urgency of the situation.
- The policy could be more supportive of onshore wind energy development. We should expand the definition of "suitable areas" and make it easier to develop wind farms, except in cases where there are strong environmental or other concerns.
- The environmental cost of wind turbines is significant. Each turbine requires 900 tons of steel, 2,500 tons of concrete, and 45 tons of non-recyclable plastic to build. They have a lifetime of only 25 years and need up to 700 gallons of oil for their gears and hydraulic systems, which must be replaced every year. Wind turbines are also a threat to wildlife, with some studies estimating that they kill up to 300,000 birds each year.
- I am pleased to learn that wind turbine blades can now be recycled. This is a significant step forward in the sustainability of wind energy.
- Support wind turbines on farmland as long as they do not harm agricultural production.
- I understand that these statements are general, but I cannot fully support them without more details. For example, what about innovative new products like home-efficient small wind turbines for individual houses?

- Wind energy developments may increase carbon emissions overall if not assessed carefully. All wind energy developments should have a whole life-cycle assessment and the full support of the local community.
- Supports relaxing planning regulations for domestic wind power generation, it would be easier for people to generate their own power and that there are new turbines available that are safe for birds and wildlife. The cost of installing and connecting wind turbines to the national grid has decreased significantly over time.
- There is evidence that wind turbines can be noisy, and that people living close to them can find the noise intolerable. This should be taken into account when granting planning permission for wind farms.
- Wind energy is essential, and as we are a coastal region, it is possible to site wind farms offshore.
- The policy should set clear and specific targets for wind energy generation, both in the short term and long term.
- Land grades of 3b should be excluded from wind farm development, and that materials for wind farms should be designed and manufactured in the UK or Europe.
- Wind energy has been criticised for its impact on the landscape, visual amenity, and residential areas. Some people argue that wind energy is not a reliable source of energy because it is intermittent and cannot store surpluses.
- EDDC should identify areas where new wind turbines would be acceptable to local residents, taking into account the benefits of local generation for farms, communities,

<p>and new developments. They should also encourage farms to install their own wind turbines and it should not be audible from housing areas.</p> <ul style="list-style-type: none"> The policy does not include provisions for the decommissioning of wind farms, the reuse of land after wind turbines removed and the visual impact of wind farms. 	
Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	No comments.
Commentary on policy redrafting for the Publication Plan	
See ne policy CC03.	

Strategic Policy 32 – Energy Storage	
The policy supports energy storage and set requirements	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> Newton Poppleford and Harpford Parish Council think that every new development should have the facility to produce and store energy. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> Concern about potential risk and environmental impact, especially the fire safety noted, added the requirement to comply with the latest National Fire Chiefs Council Guidance to address the concerns.

- Hawkchurch Parish Council suggest the following rewording ‘Landscape, visual or residential amenity **(including cumulative landscape and visual impacts);**’
- Hawkchurch Parish Council suggest that Policy 32 be completely revised to bring it into alignment with the other energy policies and to conform with the NPPF and national guidance. The PC have also taken note of the way other local plans have been drawn up to safeguard communities and have considered the recent advice from the Fire Service regarding the Wadbrook battery storage proposed development. Suggested wording included in representation.
- Devon County Council welcome this policy – add reference to economic opportunities highlighted in ‘A Clean Growth Vision for Development in the West of East Devon’.
- Exmouth Town Council Members are supportive of this policy and believe that due to the cutting-edge nature of battery and smart systems, flexibility is needed to support technological advances as they come forward.
- Clyst Honiton Parish Council believes that restricting the use of such storage facilities to just East Devon could be seen as not complying with the Duty to Cooperate. It could also be difficult to prove or enforce.
- The BESS is a new technology which EDDC failed to understand its dangers, such developments will be harmful for the environment, landscape and residents.
- Concern about the potential risks of energy storage facilities, such as noise pollution, fire hazards, and environmental impacts. They believe that these facilities

- Both support and concern for the energy storage (battery), are noted.
- Noted comment claimed the current policy on energy storage facilities is overly restrictive, limiting their potential locations.
- Concerns over potential negative impacts are noted but in policy wording safeguards are put in place, specifically around fire considerations.
- Policy as worded will allow for colocation of energy storage and other uses. It is direct conflict that policy constrains.
- Adverse impacts associated with batteries are noted, however these are seen as matters to be addressed through other regulatory processes and not the local plan.

<p>should not be permitted, and that the policy should be rewritten to reflect the risks</p> <ul style="list-style-type: none">• The current policy on energy storage facilities is too restrictive. It should be amended to allow energy storage on sites allocated for other uses, where appropriate. Energy storage facilities can be compatible with other forms of development, such as employment or residential uses.• Land grades of 3b should be excluded from the policy, even if this is not currently required by the NPPF. This is because land of this grade is more prone to fire, which could lead to significant damage to the environment and the surrounding area. In addition, there should be careful consideration of the proximity of appropriate firefighting resources and trained staff to any proposed development on land of this grade.• Battery storage materials have a number of ethical, environmental, and economic challenges. The mining of battery materials can have a negative impact on the environment and the communities that live near mines. The production of batteries also requires a significant amount of energy, which can contribute to climate change. Batteries have a limited lifetime, which means that they eventually need to be disposed of, which can also have environmental impacts.• EDDC can help kickstart a drive for more households to install solar panels and energy storage by providing financial incentives, educating the public about the	
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benefits, making it easier to install, and partnering with local solar installers.	
Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	No comments
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title:	
<ul style="list-style-type: none"> Strategic Policy CC04 – Energy Storage 	
<p>Change policy wording to allow more flexibility.</p> <p>added the requirement to comply with the latest National Fire Chiefs Council Guidance to address fire safety concerns</p> <p>Change the picture to show a more common battery storage.</p>	

Strategic Policy 33 – Heat Networks	
The policy identified and promoted Heat Networks	
Draft Plan Consultation	
Key issues raised in consultation:	Officer commentary in response:

- Further clarity is required on existing and proposed heat networks within the district in addition to the operation of such networks and connectivity requirements. The policy as worded provides the onus on developers to achieve a connection in order to secure planning permission and it offers no flexibility in considering whether a connection is feasible on a site-by-site basis. The policy in its final wording should allow flexibility. The Council should also consider whether its strategy for district heat networks is consistent with its goals for net zero carbon given that often district heat networks are reliant on gas as the most viable option.
- Agents for Bloor Hones support policy but consider policy should reflect the fact that networks should not be gas based and recognition is given of very low heat demands of new homes meaning most new networks be non-viable.
- Exmouth Town Council members generally support the policy on heat networks, but they believe it needs to be strengthened in several areas. They want to ensure that heat networks use renewable energy, are well maintained, and are linked to the Energy Security Bill. They also want more clarity on how the threshold of 1200 homes was established.
- Clyst Honiton Parish Council suggests that heat networks must be powered by green energy only. The Cranbrook system uses carbon fuel, which should not be allowed under this plan. It is not acceptable to expect householders in the future to sign up to and pay for a heating network that they do not see as green.

- Concern regarding policy flexibility noted and agreed upon. Policy wording was amended in order to allow flexibility on the heat network connection and added requirements on a feasibility study for a new heat network.
- Suggestion on Heat Network should only be powered by green energy are noted.
- Concern on the existing Heat Network conditions, reliability and single supplier issue noted.
- References to contractual matters in policy are not seen as appropriate, as they are operational matters.

- Developers assumes no heat network would be required as below policy threshold of 1,200 dwellings.
- Cranbrook Town Council is concerned about the resilience of the district heating system in Cranbrook. Cranbrook TC notes that the district heating system has failed every winter in recent years, and that the most recent failure was due to widespread valve failures in individual HIUs (Heating Interface Units). Town Council is also concerned that Eon, the operator of the district heating system, does not have the resources to respond to failures. As a result, residents have been left without heat and hot water for several days.
- Cranbrook TC is concerned that the draft local plan includes a requirement to connect to district heating where development is within 1 km of an existing network. The Town Council believes that this requirement should be revised to address the concerns about the resilience of the district heating system. Specifically, the council recommends that:
 - Cranbrook Town Council be a party to any contractual agreements for district heating so that it can exercise due control as a planning authority.
 - The strategic requirement in Strategy 33 be fully supported with operational resilience and the capacity to respond to system failures.
 - Cranbrook Town Council work with Eon to improve the resilience of the district heating system and ensure that residents can report failures easily and quickly.

<ul style="list-style-type: none">○ Cranbrook Town Council provide financial assistance to residents who are affected by district heating failures.● Change policy to clarify that commercial floorspace requirement relates to B1 use only, and that applicants should investigate the potential for heat networks as opposed to being strictly required to provide them.● Central generation of heat should be more efficient than generation in individual buildings. This is because large central boilers can be more efficient than small individual boilers. However, this only works if it is economic for both the building occupiers and the heat generation organisation.● It is better to have Passiv Haus standard homes as not much heat is needed in the first place.● Cranbrook is a town in the UK that has a district heating network. The network has been plagued by problems, including a single supplier, high prices and poor reliability. This has led some people to question the value of district heating networks.● Home Builders Federation highlights that for the foreseeable future it will remain uneconomic for most heat networks to install low carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered.● Home Builders Federation draws attention to Government consultation on Heat Network Zoning which identifies	
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<p>exemptions to proposals for requirements for connections to heat networks</p> <ul style="list-style-type: none"> • Housebuilders should have the freedom to choose whether to connect to a heat network. If they can meet the other objectives without connecting, there is no benefit to forcing them to do so. • District heating networks are a better alternative to individual gas boilers, but they are not a long-term solution. We should focus on building houses that are more energy efficient and rely less on external power. • Energy-from-waste schemes need to be considered. • A comprehensive assessment of the carbon emissions associated with heat networks throughout their entire lifespan is required for all proposals. • The requirement for properties to connect to heat networks may not comply with Building Regulations, may not be more sustainable than microgeneration sources, and may be contrary to competition law. • The policy must be properly assessed in the upcoming viability assessment, which must also include a thorough assessment of the viability of older person's housing. 	
Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	
Commentary on policy redrafting for the Publication Plan	

Redrafted policy title: <ul style="list-style-type: none"> • Strategic Policy CC05 – Heat Networks
Policy flexibility: The policy now allows for more flexibility in deciding whether to implement a heat network.
Feasibility study: A feasibility study will be required for all potential new heat network proposals.

Strategic Policy 34 – Embodied Carbon	
The policy emphasises the importance of reducing embodied carbon and requires major developments to undergo an embodied carbon assessment.	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Retaining ‘at least’ the foundations should be deleted as foundations of older properties wouldn’t be acceptable for modern building regulations – amend to “retain existing buildings unless refurbishment is either unviable or impractical”. • McCarthy Stone is concerned that the proposed embodied carbon policy could make it unviable to develop specialist older persons' housing. They argue that the policy should be flexible enough to allow for sustainable development and be properly assessed in the forthcoming viability assessment. They also recommend that the viability 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Suggestions on policy wording amendment noted and accepted. Policy wording “or at least the foundations” deleted. • Concern regarding policy would affect the delivery of specific housing noted. No clear evidence was provided. • The suggestion of cement-free construction was noted. • General support/agreement in principle noted. • Concern regarding misleading policy wording noted and agreed. Delete policy wording to avoid confusion.

assessment should include a proper assessment of the viability of older persons' housing.

- Exmouth Town Council Members support new policy on embodied carbon but worry about training implications and lack of mention of recycling.
- EDAL supports the objective of the policy to reduce embodied carbon but believes that the second part of the policy is unduly onerous and conflicts with the first part. The policy should be revised to refer to viability and practicality in terms of the reuse of existing buildings, and indeed in demonstrating net-zero lifecycle emission.
- Clyst Honiton Parish Council agreed in principle.
- New housing development should be more sustainable and tightly regulated to avoid repeating past mistakes.
- Home Builders Federation considers that this policy does not serve a clear purpose and it is not evident how a decision maker should react to development proposals, particularly in relation to how a reduction in embodied carbon is considered.
- This policy is an example of excessive environmentalism and should be dropped. We should rely on the discretion of our planning team to assess each application on its merits.
- The retention of foundations prevents self-builders from claiming zero-rated VAT. This may be an oversight or a deliberate policy to increase costs.
- Exmouth has lost many historical buildings due to neglect. Owners of vacant properties should be made to maintain them or have them compulsorily purchased.

<ul style="list-style-type: none"> • Planning requirements should include cement-free construction to reduce environmental impact. • The policy is a good start, but it needs to go further. We need to build houses that last for centuries, not decades. This will reduce carbon emissions and waste. • The destruction of forests and the concreting of large swathes of land will release vast amounts of carbon into the atmosphere, accelerating global warming. 	
Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	No comments
Commentary on policy redrafting for the Publication Plan	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Strategic Policy CC 08 – Embodied Carbon 	
<p>Added requirement for all major developments required to undertake embodied carbon assessment</p> <p>Deleted 2nd paragraph policy wording to avoid confusion</p> <p>Change policy wording from reduce to minimise, in line with the other policies.</p> <p>Deleted policy wording “ or at least the foundations”.</p>	

Sustainability Appraisal	
<p>Policy numbers/titles:</p> <ul style="list-style-type: none"> • 27. Strategic Policy – Climate Emergency; • 28. Strategic Policy – Net-zero Carbon Development; • 29. Strategic Policy – Promoting renewables and zero carbon energy; • 30. Strategic Policy – Suitable areas for solar energy developments; • 31. Strategic Policy – Suitable areas for wind energy developments; • 32. Strategic Policy – Energy storage; • 33. Strategic Policy – Heat networks; • 34. Strategic Policy – Embodied carbon; 	
<p>Outcome of sustainability appraisal:</p> <p>Preferred alternative: Policies 27 – 34.</p> <p>Reasons for alternatives being preferred or rejected:</p> <ul style="list-style-type: none"> • The preferred policies (27 – 34) are likely to have wide-ranging positive effects on minimising carbon emissions, climate change adaptation, health, and the economy. Negative environmental effects can be effectively mitigated. • 27A. Carbon neutral by 2050 – this reflects the requirement in the Climate Change Act 2008, but is rejected as it performs less well than the preferred policy as it performs less well than the preferred policy on climate change objectives, which is consistent with the Council Plan and “climate emergency” declaration. • 28A. Do not require new development to be net-zero – this would mean relying on national policy and the emerging Future Homes and Future Buildings Standard. This is rejected as it performs less well than 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Policy 28A (CC03) – Following the Strategic Planning Committee meeting, the local plan policy approach that relies on application of building regulations in respect to future energy standards for construction, rather than one that seek to exceed these standards be endorsed. Thus, the policy required residential development scheme meet the energy efficiency requirements set out in the Future Homes Standard 2025*, and encourages the use of renewable energy sources, especially solar photovoltaic (PV) panels.

the preferred policy on climate change objectives, and introduces greater uncertainty on when and whether net-zero development will be achieved (given that Future Homes and Future Buildings Standard will make buildings zero-carbon ready, rather than net-zero).

- 30A and 31A. Do not identify suitable areas for solar and wind energy developments – this would entail general policy support rather than identifying areas. This is rejected as climate change effects are less positive compared to the preferred policy, due to a less proactive approach to delivering renewable energy.
- 32A. Identify suitable areas for energy storage – this would provide greater certainty on their delivery, but the impacts of such facilities are uncertain and will vary depending on the proposal, so it is considered more appropriate to have a general policy of support.
- 33A. Do not require major development to connect to existing heat network, or for large-scale development to create a new heat network – this is rejected as it would limit the potential for development to achieve net-zero, with evidence suggesting that heat networks are the most cost effective and efficient way of heating large-scale development.
- 34A. Do not take account of embodied carbon in development – this is rejected as carbon emissions from existing development would not be considered, and therefore performs less well on the climate change objective due to increased carbon emissions from new development.

10 Conclusions

10.1 Policy redrafting has been made in the Publication, Regulation 19. Local plan.