

Ms Liz Pickering - Principal Forward
Planning Officer
Mid Devon District Council
Forward Planning & Conservation
Phoenix House Phoenix Lane
Tiverton
Devon
EX16 6PP

Our ref: DC/2007/101820/SE-
02/SP1-L01
Your ref:
Date: 19 August 2013

Dear Ms Pickering

LOCAL PLAN REVIEW – DUTY TO CO-OPERATE AND SCOPING CONSULTATION

Thank you for your consultation 04 July 2013 providing us with an opportunity to comment on the above. Our comments in respect of both the Local Plan Review Scoping Report and the Local Plan Review Sustainability Appraisal Scoping Report are set out below.

Local Plan Review Scoping Report

Infrastructure (pages 28-30)

We note that various types of infrastructure are mentioned here including roads, schools, community facilities and open space. However, we consider that flood defence infrastructure should also be included as funds from the Community Infrastructure Levy could also be used to contribute to off-site flood risk reductions measures.

Environment (pages 30-31)

We consider that the existing Core Strategy Policy (COR2) is limited in its scope because it does not appear to recognise overarching environmental issues such as climate change and ecosystem services. We therefore have a preference for Option 2 to replace the policy with a broader environmental strategy which could also include detailed policy on flood prevention. We acknowledge that detailed policies will need to be developed carefully, capturing the full range of environmental topics while recognising the local distinctiveness of Mid-Devon for each topic.

This section should also recognise the value of the Local Plan in managing environmental issues that are best addressed at a strategic level, for example:

- (i) land management and its impact on the ecological condition of the district's waterbodies;
- (ii) the resilience of protected habitats and species to developmental and recreational pressure.

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Land Allocations (pages 32-40)

It is not clear whether the Land Allocation policies captured in the existing Core Strategy (e.g. COR13) are to be reviewed as part of the Local Plan review. We recommend that the existing Land Allocation policies are reviewed to ensure that they robustly fulfil the revised 'Strategic Matters' policies. The land allocations identified within the Core Strategy would also benefit from a review under the revised policies.

Managing Development (pages 43-44)

We are satisfied that the comment we provided previously on the draft Local Plan Part 3: Development Management Policies have been captured in the revised and submitted Local Plan Part 3. We support Option 2 given its opportunity to capture national policy/guidance updates and to benefit from lessons learnt.

Local Plan Review: Sustainability Appraisal Scoping Report, July 2013

Paragraph 2.4 – Biodiversity and green infrastructure

As with the Scoping Report (see comment on 'Environment' above), we consider that this section would be stronger if it recognised the value of the Local Plan in managing environmental issues that are best addressed at a strategic level. It is not clear why playing fields have been specifically identified as needing an holistic approach, as an holistic approach is fundamental to all biodiversity and green infrastructure needs.

Paragraph 2.17 – Water

We consider that this section should recognise the importance of considering land management and its implications for the ecological quality and status of a river. There should also be reference to the Water Framework Directive and the South West River Basin Management Plan.

Paragraphs 3.4 to 3.6 – Physical characteristics

We recommend the inclusion of reference to Mid-Devon's landscape designations and their relevant management plans and also to Natural England's National Character Area profiles.

Paragraphs 3.7 to 3.12 – Biodiversity and green infrastructure

Please include reference to the water environment, in particular the South West River Basin Management Plan and the Water Framework Directive. Please include reference to Ecosystem Services and the relevant national policies and guidance. This section should also recognise the strategic importance of waterbodies as green infrastructure.

Paragraphs 3.19 to 3.20 – Community and wellbeing

It is recommended that access to open green space is recognised in this paragraph, preferably with a cross reference to green infrastructure.

Paragraphs 3.38 to 3.39 – Resources

We recommend that water resource are incorporated into this paragraph.

Paragraph 3.46 – Water

It is advised that the Strategic Flood Risk Assessment is undertaken in parallel with the revised Local Plan to ensure that conclusions drawn from the assessment are captured in the Local Plan revisions. Information regarding the Water Framework Directive status of waterbodies in Mid-Devon should be provided, with reference to the South West River Basin Management Plan.

Section 5, Paragraph 5.3

Please add the following points to the table:

- (i) include 'resilience to climate change' under (C); and,
- (ii) include 'water resources' under (D).

Section 7

Please add the following documents under 'Biodiversity and green infrastructure':

- (i) the two green infrastructure documents relevant to Mid-Devon;
- (ii) the South West River Basin Management Plan; and,
- (iii) the Water Framework Directive;

These should also be captured in the sustainability conclusions.

Yours sincerely

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