

Green Infrastructure Plan – Summary of Responses

General Comments

- Document should make much more up front mention of historic environment, given that Devon landscape has been heavily influenced by historic human management; summary refers only to 'natural green space' though most examples of GI given throughout are historic environment assets.
- Production of GI plan very welcome, but consider providing more information about specific GI projects in Mid Devon, and have an implementation strategy to ensure most important projects are identified, prioritised and delivered.
- Document should recognise crucial role of those who currently look after and maintain landscape and biodiversity, particularly farmers, landowners and foresters – where new GI is proposed there will inevitably be an impact on existing businesses and land-use and this should be acknowledged in the plan.
- Document seems to be aimed at urban developments, rather than rural communities.
- Not easy to predict how this document will fit either with Localism Bill, NPPF, suggested Local Nature Partnerships, terms of Natural Environment White Paper, National Ecosystem Assessment and Nature Improvement Areas.
- Consider likelihood of being able to recycle more materials in future and opportunities for encouraging this.
- Look to protect areas in future from light pollution – see recent Exmoor designation as International Dark Sky Reserve.
- Encourage use of volunteers – they bring diversity, knowledge, skills and enthusiasm.

GI Assessment and Methodology

- Majority of comments very supportive of assessment and methodology.
- To be effective GI score should be used as a Key Performance Indicator, should be publicly available and routinely reviewed; councillors should be made accountable for delivering GI improvements in their wards.
- Changes can only be secured through the planning system, given that most of the land is in private ownership.
- Standard map required, example in plan does not correspond with the one in the Local Plan.
- Could refer to English Heritage's Assets@Risk work; welcomes reference to designated and non-designated assets; mapping could include a selection of key non-designated assets from datasets held by County Historic Environment Record.
- Assessment could say more about district's historic environment and how it blends with other aspects of GI, e.g. from human creation/usage of heaths (prehistoric barrows, medieval field systems etc) to WW2 airfields; major linear infrastructure, e.g. canals, miles of disused

railway, are historic assets as well as havens for nature and places of recreation; references to whetstone industry on Blackdowns should refer to collapsed mine adits, not linear spoil heaps.

- Assessment of accessible natural greenspace according to Natural England's standards should be expanded to include 'people that live within 300m of an area of green space of 2Ha and above in size'
- Accessible Natural Greenspace Standards are aspirational but not achievable throughout district; cost of acquiring additional sites could have implications for food security; should instead consider linear space standards produced by Natural England, or the Woodland Access Standards (WASt)
- Need to show that document actually highlight existing assets, e.g. Strategic Nature Areas (SNAs) reflect best opportunities for habitat creation and enhancement rather than areas of specific quality in their own right, which are safeguarded through designations such as LNRs, NNRs, SSSIs and County Wildlife Sites
- SNAs in GIP are not fully up to date; Devon County Council (DCC) have refined assessment and identified additional SNAs, including further areas of purple moor grass/rush pasture and deciduous woodland, which are not reflected in GIP
- Biodiversity Delivery areas identified by Biodiversity Southwest should be added to habitats map
- Add information relating to improved or new walking or national cycle routes, as GI funding could help fund these – link to Devon Green Infrastructure Plan and Devon Rights of Way Improvement Plan
- DCC checklists for impacts on geological features approach could be adopted throughout GI policies
- Fails to follow DCC's lead over establishing a priority for the 'protection and management of strategically important landscapes, historic assets and their settings'
- Not convinced that presence of GI in a catchment area equates to accessibility/usability of that resource for multiple benefits, e.g. an area may score well for biodiversity but this may not be largely practical to local people's daily lives; similarly a village may be close to a large open access land but not well connected to it by public rights of way
- Total length of Public Rights of Way given in miles – all other measurements in document are in metric, change to km for consistency (and be in accordance with DCC's GI document)
- Within GI Assessment under 4.16 state 'Unsurfaced unclassified county road (uUCR) network is currently being mapped by DCC'
- Remove phrase 'right to roam' from 4.16 as is emotive and incorrect
- Map of Public Rights of Way has some omissions and should be checked with the definitive map held by DCC
- Graphs in section 5.1 should assess against public rights of way and other linear routes
- Needs to specifically mention irreplaceable habitat of ancient woodland (see paragraph 4.7); does not benefit from full statutory protection, is a finite resource with only 2.1% of MDDC covered in ancient woodland; suggested alternative wording of 'woodland constitutes about 19% of

Mid Devon's total land coverage, with ancient woodland account for about 2%, and provides habitat "stepping stones" for a variety of species'

Definitions

- Clearer definition of 'wildlife corridor' would be appreciated
- Clarification of '34 species found only in UK and 16 found in Devon'

Consultation

- How is the policy to be cascaded to local councils, and will they need to implement GI enhancing schemes

Specific Infrastructure Comments

- Supportive of efforts to incorporate green/wildlife corridors, SUDs, natural water courses, new ponds/lakes, new hedges, wetlands; include swift nest boxes/bricks, sparrow and bat tiles; green roofs/walls, community orchards
- Preservation orders should be placed on ancient hedgerows and Devon banks
- All grade 1 and grade 2 land should be preserved as farming land; food to be produced locally to reduce food miles and impact of air pollution
- For larger developments over 1 hectare some green space be given over to wildflower meadows
- Install webcams by nests of peregrine falcons – can generate much local interest
- Council should be seeking out and supporting innovative solutions for delivering renewable energy and low carbon sources; e.g. biomass digesters, combined heat and power plants, harnessing energy from waste, wood chip boilers, hydro-electric power, wind power and solar panels

Strategy to 2026 and Delivery Plan

General

- Should be a separate GI policy for historic environment
- Appropriate weight should be given to community engagement in local environment, e.g. in both auditing and enhancing their GI assets; new toolkit for this being developed by DCC and Community Council for Devon
- Priority to be given to creation of footpaths, bridleways and cycle paths
- Preferred to have seen direct reference to landscape and landscape character within drawn objectives
- GI is an opportunity to reduce fragmentation and this should be included as an objective
- Missing priorities include locally focussed consumerism, e.g. promoting local food; green alternatives to unsustainable modes of transport; and encouraging a low carbon society and promoting low carbon fuels

Strategic Objective 1

- Unclear how green tourism element will be achieved within policies
- Include a statement about connectivity between accessible GI
- Where new schemes are proposed it is advised to consult landowners at the earliest opportunity
- As per the stated intention to safeguard local farming should include a statement of intent to prioritise new developments on brown field sites

Strategic Objective 2

- Health and wellbeing could include enhanced access to historic sites – including linears such as railways
- Unclear in what way MDDC would enhance Rights of Way – maintenance would remain with DCC
- Unclear how enhanced rights of way and cycling networks will be achieved through policies
- Inclusion of nature reserves could be broadened to include reference to wider range of accessible natural greenspaces in view of their overall contribution to community and individual health and wellbeing
- Include an educational element within this objective to encourage people to use GI on their doorsteps

Strategic Objective 3

- Provide clearer definition of shading (also applies to Strategic Objective 4)
- Unclear how promoting green alternatives to unsustainable forms of transport will be achieved through policies
- No mention of raising standard of existing housing stock in terms of energy efficiency or low carbon
- No targets are set for 'locally focussed consumerism' and 'enhance environmentally sustainable food and fuel production'; Council should support and promote farmers markets, community farms, community orchards and more allotments; Council should introduce locally focussed consumerism in all public institutions, e.g. schools to source food supplies locally

Strategic Objective 4

- 'Creating new habitats' – providing it is sustainable and does not conflict with other environmental interests
- The delivery objectives (under policies GI/1, GI/3, GI/4 and GI/6) are largely out of the hands of the Council; it would be prudent to stand as 'guarantor' for the continued protection of these sites, and to step in if/when non-government agency fails
- A plan should set out how the Council intends to meet the stated aim of establishing a 'net gain in biodiversity'; plan should include what targets will be, how they will be measured and at what frequency they will be monitored over the 15 year period
- Council can make significant contribution to achieving 'improved linkages and connectivity between habitats to address habitat fragmentation' – many corridors are in public ownership, e.g. M5 and A361, they do not appear as of importance on maps but have good

biodiversity; amended plan could include working with other agencies to have embankments surveyed; working with other agencies and adjacent owners to improve connectivity; working with other agencies to ensure that management regime fulfils potential

GI/1 – Delivery of Green Infrastructure

- No mention of positive proposals for historic environment only potentially conflicting works, e.g. habitat creation
- Public access to 'natural green space' should be multi-functional greenspace or specifically include historic sites
- Consider reinstatement of Areas of Great Landscape Value designation previously removed, given NPPF's removal of 'protection of countryside for its own sake'
- Given Natural Environment White Paper (June 2011) places a strong emphasis upon a healthy functioning natural environment and the 'ecosystem services' that are vital for wellbeing and security and sustaining biodiversity – some reference to underlining this theme should be included; example policy to read 'habitat restoration and creation to reduce habitat fragmentation AND restore and maintain a functional natural environment'
- Best way to increase access to woodland is to create new woodland that is publicly accessible; suggested alternative wording of 'increase public access to natural green space and woodland by habitat creation'

GI/2 – Priority Catchment Areas

- Refers to exceptions if there is an over-riding biodiversity interest – but what about historic environment or landscape interest?
- Table too simplistic to determine spending priorities; need to be managed on dynamic basis to account for offsetting of impacts, part-funded schemes, other funding sources such as CIL or New Homes Bonus; spending should be prioritised on SNAs as these represent best opportunity for habitat enhancement
- Further work needed to identify priorities, could be part of project implementation strategy published as an annual report, which would then be monitored against a revised policy GI/7
- What happens where infrastructure provision, e.g. roads, in large developments, particularly industrial developments where no CIL levied but infrastructure would be necessary?
- Natural England is currently producing a series of National Character Area profiles which may be of use during annual update of priority list
- Revisit assessment of settlements to include linear access, e.g. public rights of way, cycle and multi-use routes and recreational trails; some priority areas actually have very good public rights of way; instead consider identifying sites with a combination of very poor public rights of way, cycle/multi-use routes and green space provision would be more comprehensive; identifying where connectivity between public rights of way and green space areas could be improved would make a significant contribution to addressing deficiencies in green space provision

- Cite the DCC Rights of Way Improvement Plan

GI/3 - Biodiversity

- Nature Improvement Areas, similar to SNAs are being produced following Natural Environment White Paper – consider their inclusion in final document subject to timescales
- Net gain in biodiversity should be accompanied by commitment to absolute protection of habitats such as ancient woodland – particularly as their wildlife communities are generally richer than more recent woods; it is impossible to have compensatory measures given the hundreds of years over which a woodland has developed; UK BAP targets include a Habitat Action Plan for Native Woodland which specifies a clear ‘maintenance’ target of no more loss of ancient woodland; policy GI/3 should contain a commitment to maintenance of UKBAP habitats; suggested alternative wording of ‘there are several priority habitats within the broad classes of wetland, lowland habitats and native woodland’
- Woodland Access Standards (WASSt) should be used, including ‘% of population with access to 2ha+ wood within 500m’ and ‘% population with access to 20ha+ wood within 4km’ – Mid Devon exhibits a marked deficit in accessible woodland for both categories

GI/4 – Local Nature Reserves

- No mention of Ashculme Turbery, Lickham Common and Hemyock Common as well as others in upper Culm Valley
- Unclear whether ANGSt standards applies to current population figures or projected number with upcoming development
- If provision is short at present, given population increases declaration of additional sites would be appropriate

GI/5 – Allotments

- Increase provision to one scheme per year, which would produce 15 allotments over plan period
- Strategy seems to maintain same number of allotments per person as currently exists; NSALG recommends 20 standard plots of 250 sqm per 1,000 households; consideration of applying the standard to both the named villages and major new developments; may be appropriate to use this as target measure rather than seeking to maintain current level
- Target set is extremely low

GI/6 – Integrating green infrastructure in major development

- Could cover opportunities for incorporating known archaeological sites in development areas into GI/open space masterplan; protecting archaeology ‘in situ’/cost benefit to developer (don’t have to pay to excavate it); links to networks of associated historic and natural features (e.g. East of Tiverton – railway, canal, designated and non-designated sites, plus ‘natural’)
- In addition to habitat survey (para 1.26) need for desk-based historic environment assessment and/or evaluation; alternative wording for

1.26 suggested as 'major applications should be accompanied by up to date habitat survey describing what flora and fauna are present on site, with particular regard to protected species and species of principal importance'; 1.29 should include reference to historic environment; consider no minimum development size requirement for triggering habitat survey; full wildlife report should be completed if triggered, no matter what the size

- Other development, such as new highways may escape having to provide green infrastructure to offset impact; consider re-wording
- Should allow for provision of displaced GI at other locations – need to ensure major infrastructure development provides GI
- Green corridors and public Rights of Way to be linked to wider GI network
- Alternative wording for policy to read 'biodiversity enhancement and mitigation where warranted, resulting in a net gain in biodiversity'
- Give consideration to minimum standards in relation to certain types of green infrastructure provision, e.g. section E might reference ANGSt standards
- Unclear why off-site provision made in lieu of requirements under criterion (i) will be subsumed within the developer's standard payment of CIL; it is understood that if the off-site provision is directly related to and necessary for the development to proceed our understanding is that S106 agreements may still be applied
- Policy should be clear that the requirement for provision related to non-residential floorspace will not inadvertently apply to agricultural building developments, which by their nature, will already be closely associated with greenspace
- Provisions need to be robust and actively monitored
- Request reference to positive role land use management, such as native woodland creation, can play in mitigating climate change effects on flooding and water quality; this could include increasing tree cover and investment in management of trees which can help manage water flow and improve effectiveness of SUDs; suggested alternative wording of 'climate change adaptation and mitigation by design and land use management such as native woodland creation'

GI/7 - Monitoring

- Concern at lack of target outcomes for a number of policies; ambitious targets should be set, with periodic reporting; MDDC may not be in a position to implement actions itself but can engage with agencies to do so
- Monitoring could have increase in number of designated sites with public access (permissive of LA/Community owned); decrease in heritage assets at risk; number of historic sites with Higher Level Stewardship or Entry Level options
- Need to make it clear through publicity how stakeholders such as community groups can access GIP funds for GI enhancement projects – as such groups will be responsible for delivery

Community Infrastructure Levy

- Will significant proportion of contribution be retained locally for projects in more rural areas
- Look at better development design to include GI, which might be useful in offsetting deficiencies in levy raised through CIL due to viability issues

Illustrated Example

- Amend 'footpath' to 'public footpath'; amend 'disused railway footpath and wildlife corridor' to 'disused railway public footpath and wildlife corridor'

Costing Green Infrastructure

- Should costs of tennis courts read £420,000 not £420?
- Financial constraints may mean many ideas are not feasible
- Hard to be generic for historic environment; depends on land values; could still be covered by S106 and overlap with CIL/GI
- Amount (Ha) of wetlands to be created is different on both tables
- Adjustment column sometimes appears as a figure to be subtracted from the total, and sometimes as the new total having taken the adjustment into account
- More attention on delivery to show how projects will be implemented, in particular need to demonstrate that developer contributions for GI will not be squeezed when discussing viability
- Consider providing further explanation of underlying working of calculations
- Tables should incorporate costs for access and public rights of way
- Costs for maintenance and restoration of woodland should be stated as being in perpetuity to avoid misinterpretation

Site Specific Comments

Bampton

- Could mention Norman castle and relationship to public recreational space; also a disused railway into the town
- Millennium Green to be added (public open space and wildlife site)
- Bampton Bridleway no.20 and Morebath footpath no.5 to be added to Shillingford map

Bow

- Medieval strip fields and tenement strips not mentioned – of historic and biodiversity/landscape character interest

Bradninch

- More investment needed in Charwell Meadow Wetland area

Chawleigh

- Does have allotments

Cheriton Bishop

- Recreation ground on map needs amending as is only on short term lease from the church; scouts field should be included

Clayhidon

- Archaeology on the commons

Crediton

- Cathedral; Roman villa
- Detail would be appreciated on how this would affect the town
- Request for cycle path from Lords Meadow Leisure Centre along permissive path to Westacott Cottages (landowner is receptive);

Cullompton

- The following have been omitted and should be included on the map:
 - Cullompton cemetery
 - 2 allotments (only 1 shown)
 - Cullompton Rangers Football Club, Cullompton Cricket Club and Cullompton Bowling Club
 - Bockland Close play area and other play areas on the new developments on the outskirts of town
 - Public open space at Court Farm (new development)
- Unclear whether there are any TPOs on trees in Cullompton Association Field
- Cullompton Eastern Relief Road – should make mention of need to provide GI elsewhere where it is more suitable and can be delivered effectively
- Town has very patchy accessibility of public open space; rights of way and cycle routes are fractured and it is impossible to walk without going on to long stretches of road; consider provision of strategically targeted permissive paths exploiting existing paths and tracks

Halberton

- Deficiency of allotments, need community garden of at least 10 plots
- Supportive of community composting
- Car park needed in region of Lower Town, for at least 30 vehicles, to link footpaths within the parish
- Continual maintenance of Great Western Canal should be included

Hemyock

- Unclear whether enclosed map is existing or proposed; should consult Sustrans; unclear how Hemyock was placed at 26 out of 28 in priority catchment list; Culm Valley trail is omitted (potential along line of former GWR rail track)
- Archaeology on the commons

Kentisbeare

- Whetstone mines, connecting trackways and iron pits

Morchard Bishop

- The village does have privately owned allotments
- Footpath system on map is fragmented, but actually fits in well with UCCRs and unclassified roads; priority requirements:
 - Replace playing equipment at Playing Field, cost £30k
 - Funding for youth club/activities, cost £10k
 - Lights for tennis/netball courts, cost £5k
 - Parish cycle track, uncosted
 - Survey to define green areas within and without settlement line, uncosted
- Some village amenities are in private hands, parish should consider purchasing if they become available
- Two Moors Way passes through to Witheridge
- Open access to Morchard Wood (even though it is privately owned)

Sampford Peverell

- (And Uplowman) – East of Tiverton development area, link high number of archaeological sites with potential open space; canal

Sandford

- What are the woodlands referred to in the map; Woodland Trust has a site in Sandford
- There are already well used cricket pitches in Creedy park

Thorverton

- (And Cadbury) – Link rich lowland archaeology of the Exe Valley, network of designated and non-designated sites including prehistoric ritual landscape; runs into '5 parishes' of East Devon and Exeter City; run through disused Exe Valley railway

Tiverton

- Roman fort (not hillfort) and rich archaeology (designated and not) in East Tiverton development area; canal
- Tiverton EUE access routes may require some displacement of GI as part of scheme; GI plan should allow for replacement in kind of any displaced GI
- Spatial recognition of Knightshayes needed to define and protect its setting
- Town centres should be enhanced along the lines of the Angel Project in Tiverton
- Some surprise at its low standing on the priority list given this where greatest housing and employment expansion is to be
- Unclear how much surrounding land the Tidcombe Fen SSSI is required for its maintenance and the protection of '16 species only found in Devon'; SSSI and Local Nature Reserve not outlined in GIP Key Diagram; give consideration to West Manley Lane and Tidcombe Fen SSSI, drainage area of Ailsa Brook, Railway Walk and sloping land north of Grand Western Canal LNR to becoming SNA; with four former farms, thatched cottage, ruined barn, Ailsa Brook and marshland,

hedgerows and small copse West Manley Lane is a microcosm of Tiverton's agricultural heritage; railway walk was part of original Brunel's Broad Gauge Railway; other historical and pre-historical remnants lie within the aforementioned curtilage of site, e.g. see Tiverton Archaeological Group's previous survey of West Manley Farm

- Palmerston Park Woods (LNR) – site should be promoted for its amenity value; exercise trail could be development involving local community; bird and bat boxes could be erected
- Moorhayes – take action to retain remaining fragments of original habitat, to enhance biodiversity and retain wildlife corridors

Uffculme

- Minor corrections to plan enclosed, including:
 - War memorial not cemetery
 - Inclusion of children's play area
 - Magelake Hall all weather pitch
 - Incorrect flood zone drawn
 - Leisure area incorrectly labelled 'play area'
 - Scheduled monument 'The Shambles', listed as none
 - 30 existing allotments (at Clay Lane), not none
- Coldharbour Mill and associated millpond and races, link to the river; path on site/former railway

Comments in response to matters not within the scope of this consultation have been included below:

- Settlement limits should not be changed as this will adversely affect attractive and productive landscapes around Tiverton
- Inadequacy of access road to Tiverton Sewage Treatment works highlighted