



**Campaign to Protect
Rural England
DEVON**

GIP

ID NO: 486
REP NO: 23
ACK: 0.12.11
SUMMARISED:

Mid Devon CPRE Group

Secretary: Mrs. Julie Rudge,
Frost Cottage,
Morchard Bishop,
Credton,
Devon EX17 6SE

Treasurer: Mr. P.J. McDouall,
8 Eastfield Orchard,
Uffculme,
Cullompton,
Devon EX15 3AS

Tel. no:

To: Mrs. Liz Pickering,
Principal Forward Planning Officer,
Mid Devon District Council,
Phoenix House,
Phoenix Lane,
Tiverton EX16 6PP



4th Dec. 2011

Dear Mrs. Pickering,

Re: Mid Devon District Council Draft Consultation - Green Infrastructure Plan.

Thank you for kindly sending the Mid Devon CPRE Group notification of the above plan and for kindly sending me a hard copy of Section 2 of the Plan, without the maps, as requested.

The Mid Devon CPRE Group responded to the earlier Green Infrastructure (GI) consultation and having discussed the recent GI set of documents at our recent Mid Devon CPRE Group Committee meeting, the Group have asked me as the Group's secretary to make the following comments:-

1) General -

The Mid Devon CPRE Group very much welcomes and supports Mid Devon's GI Plan which has now developed into a large and comprehensive set of documents giving greater detail and expanding on the earlier MDDC's "Vision for Green Infrastructure" which CPRE supported. These documents for the current GI consultation CPRE believes, ably support PPS12 by aiming to provide and promote "a network of multi-functional green space, both new and existing, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities." (p.2, Executive Summary Section 1).

CPRE has for a long time been interested in these issues which are coming forward under the GI such as the landscape, hedgerows, verges, productive farmland and the sustainable local productivity to reduce food miles, domestic gardens, access to woodlands and what was termed under the previous "Vision for Green Infrastructure" as blue infrastructure e.g rivers, streams, ditches, and ponds. The Mid Devon CPRE therefore welcomes the GI's Strategy and Plans for these elements and access provision whether by greenways, existing public rights of way, cycle routes together with open spaces and children's play areas etc. within new developments both for the welfare of communities, the general public and for improving bio-diversity. The GI proposed linkages both for people and bio-diversity are a great forward plan and even if some of it is aspirational such as the distances of large areas for people to be able to access which realistically will apply to those communities living near Dartmoor and Somerset and possibly the Blackdown Hills (ANGSt Standard) nevertheless such aspirations are to be supported and welcomed and they will be possible in some areas.

The Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Registered Charity No. 245317

2) Specific Comments:-

- a) Executive Summary – As an over view document of all the documents for the Mid Devon Green Infrastructure, this is helpful as it clearly indicates what green infrastructure is with relevant examples; the GI benefits and objectives; the GI assessment giving the different characteristics e.g. landscape and historic character, agricultural land quality, public rights of way and open access land, biodiversity, all of which the Mid Devon CPRE believe are very important. The Catchment Area Assessments are very interesting and CPRE hopes that Parish Councils and local people will come forward to correct any omissions which may occur e.g. Morchard Bishop does have allotments. CPRE welcomes and supports the seven proposed policies for the Strategy to 2026 as set out on page 9 of the Executive Summary and finds the costs and funding as set out in the Delivery Plan p.10 equally interesting. The GIP Map is helpful particularly as it shows the cross boundary character areas, GI/I referred to on p.9, such as the North Devon Biosphere Reserve to the west, the Strategic Nature Areas to the north, east and south. The Mid Devon CPRE Group has always regarded the Mid Devon area to be strategically located because so many other Local Authority areas abutt its boundaries. This applies too to the Regional Walking routes, the National Cycle routes as well as the rivers many of whose tributaries flow through the valleys of Mid Devon. The Map helps to give the perspective of what exists in this way and other characteristics being the Historic Parks and Gardens. Because of only having a black and white copy of the Map, I find it difficult to understand the different areas of Strategic Open Spaces for 200ha or 100ha.
- 2b) Section 2 – GI Assessment. The Mid Devon CPRE Group has partly already given some of its supportive comments about this section as it has come forward in the Executive Strategy. The Group would like to comment further about some of the detail as contained in the GI Assessment
- The Group agrees with and supports the stated "Benefits of Green Infrastructure and the GIP" as explained on p.5. The Group welcomes the concept that development should "coexist with and compliment GI" etc. "to minimise and mitigate impacts to biodiversity and landscape setting". Green corridors and planting would help in this way as well as helping to mitigate the effects of CO2 emissions and thereby improve the quality of people's lives. Planting in industrial or retail development areas where there is inevitably much traffic movement can improve air quality, help to alleviate flooding potential as well as providing linkages for wildlife.
- The Mid Devon CPRE Group was involved in the consultation process for identifying MDDC's Landscape Character Assessment and very much welcomes that GI policies should "help to protect landscape and settlement character" which includes the historic environment, a heritage to be protected for all time. The Group has already referred to the importance of agriculture as a sustainable resource and to reduce food miles (CPRE's letter, p.1, para.1).
- The Group especially supports the recognition that "the sight of undeveloped land" can also benefit public health even where there is no public access. It is the views which Devon offers which give both locals and tourists alike a sense of well being and being at one with the countryside. There is also the tranquillity in certain parts of Mid Devon, also beneficial to well – being, where there is no traffic or aeroplane noise. This is part of the enjoyable experience when using Mid Devon's Public Rights of Way whether on foot or horseback and walking in the woodlands e.g. the extensive Eggesford Forest or the small historic woodland in Morchard Bishop which in spite of being private has traditionally always had open access thanks to successive landowners.
- p.9, para. 3.6 – Green Areas Designation. CPRE welcomes the fact that this designation is included in the Government's draft National Planning Policy Framework and that such areas should have the same level of protection as the green belt areas. Nevertheless CPRE both nationally and locally does have concerns about the above draft Policy with its emphasis being on development to the detriment of the countryside.
- p.11 – 18. Part 4. What we have now – This part is a very helpful description of Mid Devon's characteristics with further reference to MDDC's Landscape Character Assessment and describing the special quality of the river valleys much appreciated by us all and valuable for GI wildlife.

2b) Section 2 – GI Assessment: continued:-

Part 4. para. 4.8/9. The Mid Devon CPRE Group welcomes the information relating to the villages, the Conservation areas and the historic core of many villages many of which have green links "via parks, cemeteries, watercourses and trees" into the wider countryside and provide the visual amenities of wide views e.g. hilltop villages with their churches such as Coldridge, Colebrooke, Down St. Mary. Posbury Clump, the site of an early battle and an early quarry, is a visible landmark, near Crediton, with its clump of trees and it can now be accessed. In an area where many large trees have been lost due to the elm disease and the flailing of hedgerows, the Mid Devon CPRE Group is pleased to see that trees are included. Trees are important to people as indicated by certain villages having "dancing trees", one formerly at Cheriton Bishop and another I believe at Kentisbeare. They are, too, important for the green links for bio-diversity providing places for invertebrates and berries as do the hedgerows.

Para. 4.15, p.16 – Access and Movement. The benefits of the Public Rights of Way network as well as the long distance routes are very much supported by the CPRE as a GI component offering sustainable and amenity access for all ages and in some cases where suitable for the disabled. Such routes offer views over the landscape in a way that the narrow Mid Devon lanes cannot do due to the high Devon banks. These have a different but much valued characteristic and CPRE especially welcomes the mention of the unsurfaced unclassified County Roads (uUCRs) which provide not only valuable green links to other areas or settlements but have a wealth of natural features and habitats for wildlife important for Green Infrastructure.

Para.4.17, p.17. Although the standards produced by Natural England as to certain sized green space areas is recognised by MDDC as not largely realisable in Mid Devon nevertheless CPRE recognises the aims as being laudable. The "localism bill" too may give opportunities for some local groups to acquire green space areas although not on the scale of the Natural England standard. With the recognition for the need for green space in the GI, CPRE very much welcomes this in respect of the green spaces in villages and particularly in towns where it is more difficult to access the countryside and therefore such green spaces as recreation parks, playing fields and children's play areas are very important for the well-being of communities. They are also a sustainable resource as people do not have to travel in cars to access green areas,

Para. 4.24–29, p.19 – p.87 – Catchment areas.

The Mid Devon CPRE finds the grading system for these areas which includes groups of parishes interesting and hopes that information from these areas will come forward to supply the relevant extra information e.g. Chawleigh and Morchard Bishop which do have allotments and the latter does have the Two Moors Way passing through to Witheridge. As already mentioned there is a policy of open access in Morchard Wood besides its two public footpaths. CPRE welcomes the Catchment area maps with the described forms of GI mentioned in para. 4.29 as this will enable the public to see at a glance what is in a particular locality for GI. CPRE supports the inclusion of Group/area Tree Preservation Orders.

2c) Section 3 – Strategy to 2026 and Delivery Plan.

The Mid Devon Group supports the above plan both its Objectives and the Policies for Green Infrastructure as contained in the above document and is impressed at the way they are set out in a comprehensive and clear way for everybody to understand.

– Objective 1: This is very much supported and welcomed by CPRE and with reference to increase the attractiveness of new and existing housing and employment land; supporting green tourism which helps the local economy as well as Devon as a whole "by promoting" various modes of usage, especially recognising "equine access," to and through the countryside etc. to include woodland and disused railways, the latter an underused resource; safeguarding local farming and "sustainable production," presumably types of crops for food use or animal feed – what would be the position for crops such as miscanthus grass or willow produced for bio-digesters?

2c) - Strategy 2026 and Delivery Plan continued:-

- Objective 2: Agreed and supported by the Mid Devon CPRE Group. In what way would MDDC enhance rights of way etc.? Presumably the maintenance would remain with Devon County Council (DCC)?

- Objectives 3 & 4: Agreed and supported. It would be helpful for the word "shading" to be clarified. As a suggestion, planting whether trees or other vegetation in new development would be helpful in a green way to help improve air quality and mitigate against CO2 emissions as well as improving green links for bio-diversity. Planting would also help to absorb water run off.

- GI/1 - Delivery of Green Infrastructure: Agreed and supported. The Mid Devon CPRE Group has long advocated when it has been involved with Inquiries held for the Mid Devon Plan that there should be cross boundary recognition and working with adjacent authorities, a welcome example now coming forward being the North Devon Biosphere Reserve as well as the other areas shown on the GIP Key Diagram Map p.6. The Mid Devon area as already remarked on by CPRE p.2, para. 2a, is a strategic area for GI providing links and designations to other parts on its boundaries. Relative to this and as an opportunity CPRE believes it would now be helpful if the designation of the Areas of Great Landscape Value (AGLV), which was removed by MDDC could be re-instated. It was removed by MDDC on the advice of an Inspector for one of the MDDC Plans because he said that there was a presumption that "the countryside should be protected for its own sake". In the light of the Government's NPPF bill which may possibly remove this presumption of protection for the countryside in favour of development, it would, CPRE believes, be a safeguard for the AGLV areas to be re-instated particularly as DCC has retained the designation and AGLV areas, references being made as part of DCC's GI - p.55 para. 3.5.12. The re-instatement would also concur with DCC GI's statement of consistency, p.9/10, D1, p.13/14 and MDDC's GI/1 to work in partnership with neighbouring authorities.

- GI/2: Agreed and supported: CPRE welcomes that it will be possible for local communities to decide about how to spend the money received from the Community Structure Levy (CIL) but CPRE notes the reservations as expressed in para. 1.8, p.9. CPRE also wonders what would happen with regards the need for infrastructure provision e.g. roads etc. in large developments especially industrial developments where there will be no CIL levy but where such infrastructure would be necessary?

- GI/3 & 4: Biodiversity and Nature Reserves: Agreed and support. CPRE notes with interest, para. 1.15, p.11, that MDDC has the power to declare Local Nature Reserves and that recognition is given to the benefits that such designations can provide for wildlife, for the public and for education.

- GI/5: Allotments. The main Devon CPRE Branch has been approached for support from the Allotments Association for Plymouth and its support was welcomed. CPRE supports such schemes for their community benefits, well-being and sustainability. The Group was involved in supporting the allotments in Sandford to prevent their development for dwellings.

- GI/? & GI/6: Development Management, p.14, and Integrating green infrastructure in major development: CPRE believes that GI is very important in new housing developments and that there are designated open spaces to include play areas, sports areas and informal open space as well as allotments. This will be especially important in large proposed developments e.g. Tiverton, Cullompton and Crediton. There is a need to make sure that existing green ways e.g. footpaths, bridleways are kept as green routes, not absorbed under tarmac, and that provision is made on the site (d) for green corridors and public rights of way to link the site to the wider GI network.

CPRE is interested in the Delivery Plan and the various possible funding mechanisms.

As secretary for the Mid Devon CPRE Group, it is hoped that the above comments are helpful.

Yours sincerely,