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**Sandra Hutchings**

SUMM:

**From:** Bill Horner  
**Sent:** 22 December 2011 16:41  
**To:** Liz Pickering; DPD  
**Subject:** Green Infrastructure Strategy  
**Attachments:** Mid Devon Green Infrastructure HES Response v.1.doc

Dear Liz and Colleagues,

I appreciate that this is well past the end of the consultation but I hope that you will be able to consider the attached comments. As you may be aware we have been undergoing a restructuring exercise and I must apologise for having not given sufficient attention to certain consultation documents.

You refer to the document being a 'living document' so I hope that there will be some flexibility in gradually addressing some of the issues that I raise - if they cannot be dealt with at this stage.

I will be very happy to discuss any of this in the New Year, particularly the supply of historic environment data.

Thank you for consulting us and for pulling the document together - I realise that there are a lot of areas of public/professional interest to be covered.

Best wishes for Christmas and the New Year. <<Mid Devon Green Infrastructure HES Response v.1.doc>>

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## Mid Devon Green Infrastructure Strategy

### Comments of the Devon County Historic Environment Service

#### 1. General Comments

The Strategy documents make welcome mention of the historic environment at various points within the text and within the individual town/village assessments. However, I feel that the document could make much more 'up front' mention of this important aspect of GI.

Very little of Mid Devon's open space or potential GI is totally 'natural'. The flora and fauna inhabit/clothe a landscape that has been very heavily influenced by historic human management. It is this combination of the natural and the historic that gives the Devon landscape its sense of place and character. The historic dimension is also critical to community identity – 'place making' - reinforcing existing community identity and helping focus/root new communities. It is also a prime reason why residents and visitors go out into the Devon landscape – historic sites, buildings and landscapes are of great interest and people can directly relate to them.

A greater emphasis on the historic dimension would also enable Mid Devon District Council to fulfil its obligations under National Planning Policy:

Planning for the Historic Environment (PPS5. Policy HE3.1) currently requires that:

*... local development frameworks (LDF) should set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, taking into account the variations in type and distribution of heritage assets, as well as the contribution made by the historic environment ...*

Similarly the draft National Planning Policy Framework (Section 178) will require (an area unlikely to be diluted in any redraft) that:

*Local planning authorities should set out a strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In developing this strategy, local planning authorities should take into account:*

- *the desirability of sustaining and enhancing the significance of heritage assets*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.*

#### 2. Specific Comments

The various documents' list of GI benefits should include the historic environment.

The various documents' list of GI Benefits, Aims and/or Objectives should also include a historic environment objective (see above comments on National Planning Policy).

The examples that are given of GI in the documents are mostly historic environment assets – e.g. parks and gardens, canals, etc. Despite which the introduction to the Executive Summary refers only to 'natural green space'. The welcome mention of the multifunctionality of GI are not backed up in the text - only recreation, visual and biodiversity are referred to in the Summary text, GI Benefits and GIP Objectives sections.

The GI Assessment could refer to English Heritage's assets @Risk work. It does make welcome reference to designated and non-designated assets. The accompanying mapping could have included a selection of key non-designated assets from the datasets held by the County Historic Environment Record. The Strategy (1.9) refers to this being a living document - hopefully such mapping can be fed in at an early stage?

The Landscape Setting and historic environment section of the GI Assessment would be a good place to cover the above comments on how much of the landscape is historic and how this relates to 'natural' greenspace.

Similarly the Environmental Context section would be good place to cover the PPS5 obligations referred to above.

Section 4.8 – 4.12 of the Assessment are fine but could say much more about Mid Devon's Historic Environment and how it blends with other aspects of GI – from human creation/usage of heaths (prehistoric barrows, medieval field systems, etc.) to WW2 airfields. Major linear infrastructure – canals, miles of disused railway - are historic assets as well as havens for nature and places for recreation. ( Note: reference to the whetstone industry of the Blackdowns - not linear spoil heaps, these are collapsed mine adits. The spoil heaps are spread downslope of the mines and access tracks).

#### **Sample comments on Individual towns/villages:**

Bow - does mention prehistoric sites but not the medieval strip fields and tenement strips = historic and biodiversity/landscape character interest.

Bampton - could mention its Norman castle and relationship to public recreational space – sports and others. Also a disused railway into the town.

Crediton – Cathedral, Roman villa.

Cullompton – future for the Roman forts??

Hemyock/Clayhidon – archaeology on the commons.

Kentisbeare – Whetstone mines, connecting trackways and iron pits.

Sampford Peverell/Uplowman – East of Tiverton development area. Link high numbers archaeological sites with potential open space. Canal.

Thorverton/Cadbury – Mentions Scheduled hillforts etc. but could link to rich lowland archaeology of the Exe Valley – network of designated and non-designated sites including a prehistoric ritual landscape. Runs into the '5 parishes' of East Devon and Exeter City. Run through by disused Exe Valley railway,

Tiverton – Roman fort (not hillfort) and rich archaeology (designated and not) in East of Tiverton development area. Canal.

Uffculme – Coldharbour Mill and associated millpond and races, link to river. Path here = former railway.

#### **Strategic Objectives and Policies**

Strat Obj 1 does include historic sites. Great.

Obj 2 (Health & wellbeing) could include enhanced access to historic sites – including linears such as railways.

Obj 4 – ‘creating new habitats’ - providing it is sustainable and does not conflict with other environmental interests.

GI/1 a to e focuses on ‘natural’ . No mention of positive proposals for historic environment only potentially conflicting works e.g. habitat creation. C – public access to ‘*natural green space*’ – should be multi-functional greenspace or specifically include historic sites.

GI/2 priority areas. Refers to exceptions if there is an over-riding biodiversity interest – but what about historic environment site or landscape interest?

GI/3 & 4 cover Biodiversity and LNRs. Should also have a separate historic environment section for balance.

GI/6 – 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) and adherence to planning policy. Links to networks of associated historic and natural features (e.g. East of Tiverton – railway, canal, designated and non-designated sites, plus ‘natural’).

1.26 refers to need for habitat survey. Also likely to need desk-based historic environment assessment and/or evaluation – so why not make this look at positives? 1.29 doesn’t refer to the historic environment – flood attenuation, leisure, recreation, natural habitats. Not things that can give such a sense of place/character/community as the historic environment.

The historic environment is in the diagram – ‘*disused railway footpath and wildlife corridor*’ - but needs to be brought out more in the front end of the document.

GI cost calculations – Hard to be generic for the historic environment. Purchase of sites/areas and linear features possible. Depends on land values. Examples could be St. Andrew’s Hill Roman fort, Cullompton; Exe Valley railway line; Uffculme mill leat. Can this still be covered by S106 and overlap with CIL/GI as this will generally be multifunctional (e.g. biodiversity interest of a railway) or informal public open space?

GI/7 – monitoring could have increase in number of designated sites with public access (permissive or LA/Community owned); decrease in heritage assets @Risk; number of historic sites with Higher Level Stewardship or Entry Level options.

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**22<sup>nd</sup> December 2011**

