



## Devon Countryside Access Forum

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**GIP**  
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SUMMARISED:

8 December 2011

Dear Sir/Madam

### Green Infrastructure Plan

The Devon Countryside Access Forum is a statutory local access forum under the Countryside and Rights of Way Act 2000. Its remit is to "advise as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area...." It has a statutory function to give advice to a list of bodies specified in the Act (Section 94(4) bodies), which includes Mid Devon District Council. This response constitutes formal advice from the DCAF and Mid Devon District Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Forum in carrying out its functions.

The DCAF has fifteen volunteer members who represent the interests of access users, landowners/managers and other areas of expertise such as tourism, health and disability issues.

The timing of this consultation did not coincide with a full public meeting of the DCAF. A working group meeting was held to discuss the draft GI strategy for Devon County Council (Making Green Connections) and some points raised during those discussions are relevant to this response. A smaller group of members from Mid Devon looked more specifically at the Mid Devon document. This response will be put on the agenda for formal approval at the Forum's next meeting on 26 January 2012.

The Devon Countryside Access Forum, is required, in accordance with Sections 94 and 95 of the Countryside and Rights of Way (CROW) Act 2000 (Local Access Forums), to advise on the improvement of public access to the countryside.

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## General Comments

The DCAF broadly supports and endorses the policies outlined in the draft document, recognising the importance of green infrastructure within Mid Devon. Part of the DCAF's remit is to advise on the 'enjoyment of access' and GI in its many forms provides value to the public. Rights of way, parks and gardens, recreational areas and open green space are vitally important in facilitating open-air enjoyment. The visual benefits of landscapes, woods, forests, rivers and water bodies add to the public benefit.

It is pleasing to note the references to agricultural land in association with green infrastructure, in particular on p.5 which refers to "farming land as an important GI reserve" and 4.4 which mentions the Mid Devon farming belt as an "irreplaceable resource for food production as an essential function of green infrastructure". However, it would be helpful if the document recognised the crucial role of those who currently look after and maintain the benefits of landscape and biodiversity in Mid Devon; particularly farmers, landowners and foresters. Where new GI is proposed there is inevitably an impact on existing businesses and land-use and this should be acknowledged in the GI Plan.

The consideration of GI at a more local level within the District is a very valuable assessment. There may be some errors in the parish descriptions and the DCAF trusts that these can be amended by Parish Councils and local residents, particularly where there are underutilised or unidentified GI assets.

It would be valuable to include greater linkages between the Mid Devon GI document and that of the County Council, also out for consultation.

## Specific Points

### Comments on the GI Assessment document

1. The DCAF is pleased to note the reference on p.5 to the importance to health of visual sight of landscapes.
2. **4.15 and 4.16** The inclusion of the section on access and movement is useful in emphasising the importance of public rights of way, recreational trails, cycle routes and access land.
3. **4.16** This section states that the uUCR network is not mapped. It would be useful to amend this to state that Devon County Council is currently surveying and mapping the uUCRs in Mid Devon.

The DCAF advises that the term 'right to roam' should be removed from the description of access land as that phrase is emotive and incorrect.

4. **4.17** The DCAF notes the inclusion of Accessible Natural Greenspace Standards. These standards are aspirational and laudable but it is not felt they are achievable throughout Mid Devon District. The cost of acquiring and maintaining additional green space areas would need to be addressed and there could be potential implications for food security

The ANGSt standards do not relate to population density, the existing network of public rights of way and cycle/multi-use routes, activity levels or an established need/desire for improved access.

If the Council wishes to assess GI provision against standards the DCAF advises that the document should include the linear space standards, produced by Natural England to assist local authorities in assessing access. These standards were drawn up following research by Entec in 2000.

[http://www.iprow.co.uk/gpg/index.php/Evaluating\\_Existing\\_Networks](http://www.iprow.co.uk/gpg/index.php/Evaluating_Existing_Networks)

In addition, there are Woodland Access Standards (WASSt) created by the Woodland Trust.

<http://frontpage.woodland-trust.org.uk/woodsforpeople/finalreport/was.htm>

Natural England's Green Infrastructure Guidance (NE176) states that "however in every case standards can only be used as a guide as there can never be a 'one size fits all' solution. This is because green infrastructure provision must also reflect local need and the specific character, opportunities and constraints presented by individual sites, taking into account population trajectories and proximity to existing green infrastructure...".

5. **4.17** The DCAF is aware of some omissions on the very useful map of Public Rights of Way and advises that this map should be checked with the latest version of the Definitive Map held by Devon County Council.
6. **5.1** The graphs in this section relate to GI available within 2 miles of the community. The DCAF advises that this assessment should include public rights of way and other linear routes. Further comments on this point are made later on in this response.

### **Strategy to 2026 and Delivery Plan (p.24)**

- **Objective 1.** The DCAF widely supports Objective 1, particularly that relating to "supporting green tourism and the leisure economy by promoting improved bicycle, pedestrian and equine access to and through the countryside, and enhancements to historic sites, nature reserves, woodland, disused railways and the Grand Western Canal." It would be useful to include a statement about connectivity between accessible GI. Where new schemes or improvements are planned the DCAF advises that landowners should be consulted at the earliest opportunity.

Policy GI/1 associated with this objective is supported.

- **Objective 2.** Objectives to encourage health and well-being through interaction with the natural environment are supported. The DCAF advises that it would be useful to include an educational element within this objective to encourage people to use the GI on their doorsteps.
- **Objective 3.** Sustainable transport initiatives to mitigate climate change are supported by the DCAF.

- **G1/2 Priority Catchment Areas (Strategy to 2026 and Delivery Plan p.10)**  
In drawing up its priority catchment areas it would appear that Mid Devon has used the ANGSt space criteria developed by Natural England. In so doing the DCAF is concerned that linear access has been ignored: the public rights of way network, cycle and multi-use routes and recreational trails. This has had the effect of distorting the accessibility to GI that exists in many of Mid Devon's villages. Many of the top priority catchment areas have a good rights of way network. Morchard Bishop, for example, which is number 6 on the list has an enviable and extensive network. The DCAF would suggest that the assessment of settlements should be re-visited to take this into account, especially as this list will determine how scarce resources will be allocated. There may be green space deficiencies in these priority catchments but this does not represent the full picture.

The Bow/Copplestone/Crediton area is identified as the priority area in the Strategy yet some settlements in this area have good rights of way. There are key areas with very few public rights of way; for example the western side of Tiverton, identified as a deprived town. Identifying settlements with a combination of very poor public rights of way, cycle/multi-use routes and green space provision, where specific needs have been identified locally, would be a more comprehensive and positive approach. This process could be aided through use of the Rights of Way Improvement Plan which seeks to identify rights of way improvements of benefit to the local community. The DCAF would like to see the Devon County Council Rights of Way Improvement Plan cited in the Strategy and Delivery Plan.

Equally, identifying where connectivity between public rights of way and green space areas could be improved would make a significant contribution to addressing any deficiencies in green space provision.

- **GI/6** The DCAF welcomes the integration of greenspace within new large housing developments, particularly open space, formal and informal play areas and cycle/walking routes. Connectivity to surrounding greenspace and public rights of way is an integral part of this process and it is encouraging to see this included.

The 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.

- **2.6.** The DCAF is pleased to note reference to the Community Infrastructure Levy as being 'only one funding stream'. The CIL proposals, with a levy solely on housing and large retail schemes, may be unable to deliver much in the way of GI. The CIL may not be easily borne in the present market, especially if land purchase took place prior to CIL being introduced so that there is no opportunity to account for that in any subsequent selling price.

The concept of pooling CIL funds for use across the district, with only a 'meaningful' and, as yet, undefined proportion being spent on the development that has produced it, is questionable. The DCAF advises that using the

planning system to look at better development design, to include GI, would be useful and might offset deficiencies in the CIL fund.

- **2.8 Costing Green Infrastructure**

The Devon Countryside Access Forum advises that access and public rights of way, included in the objectives and GI policies, should be incorporated in the tables reflecting costs, monitoring, existing and future GI requirements.

The Devon Countryside Access Forum trusts that its comments will be taken into account and looks forward to receiving feedback.

Yours faithfully

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Hilary Winter  
Forum Officer

Chairman: Dr J Robbins  
Vice Chairman: Robin Head

