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**Strategic Planning**

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6 December 2011

**Devon County Council Comments on the Mid Devon Green  
Infrastructure Plan**

**09 December 2011**

Dear Sir/ Madam,

**RE: Consultation on Draft Green Infrastructure Plan (GIP)**

Thank you for the consultation notification for the Draft Green Infrastructure Plan. Below are Devon County Council's comments on the documentation published.

This document sets out Devon County Council's response to the consultation by Mid Devon District Council on their Green Infrastructure Plan or 'GIP'. This report comments on all sections of the plan as presented at <http://www.middevon.gov.uk/index.aspx?articleid=8128> as one document, and does not comment on them separately.

**General Comment**

Devon County Council is pleased to see the production of a Green Infrastructure Plan for Mid Devon, and welcomes the opportunity to comment on a draft version of it.

It is felt that the plan represents a good start in prioritising green infrastructure through the planning system in Mid Devon. In particular, it is welcome to see how the community infrastructure levy will be used to generate funding to help offset the general degradation that occurs to the environment as a result of development. The inclusion of new planning policies will also help to decrease

the environmental impact of development, and hopefully, bring about an improvement in the general quality of life for Mid Devon residents.

Having said this, the plan would be improved by providing more information about specific GI projects in Mid Devon, and this is particularly important to ensure that the money collected for GI is spent on appropriate projects and in a timely manner. It would be appropriate to continue developing the GIP over the forthcoming years to provide a project implementation strategy, thereby ensuring that the most important projects are identified, prioritised and delivered.

Further, more detailed comments on the GIP follow below.

### **Objectives of the Green Infrastructure Plan**

The objectives of the GIP (these are included at several stages in the GIP, including on the first page of the executive summary) do not specifically recognise the importance of the historic environment or landscape for the cultural wellbeing of Mid Devon's residents. However, several paragraphs within the strategy do mention the importance of the historic environment. There is an opportunity to promote the importance of the historic environment and landscape by including them specifically in the objectives. This could be done by adding these to objective 4.

### **Assessment of Accessible Natural Greenspace**

The strategy utilises the assessment of accessible natural greenspace space according to Natural England's standards for how far people should live from areas of greenspace that are either 20Ha, 100Ha or 500Ha in size. However, there is one further standard that has not been assessed, which is that people should live within 300m of an area of green space of 2Ha and above in size. However, for a strategy that covers a District Council area, it is considered to be appropriate to run the assessment for these smaller areas. It would be appropriate therefore for the Mid Devon green infrastructure plan to assess the areas of accessible natural green space of 2Ha and above, with 300m buffers to assess the proportion of the population who live in areas that meet the standard. This is felt to be appropriate despite the assertion in paragraph 2.18 that the GI of 2Ha (and above) in size is picked up in the other assessments, as there is no guarantee that this GI is publicly accessible.

### **Habitat mapping / identification of green infrastructure assets**

It is important to ensure that the assets that have been identified truly reflect existing assets. For example, Strategic Nature Areas have been produced by Biodiversity Southwest partnership in order to identify those areas that represent the best opportunities for habitat creation and enhancement, rather than being habitat areas of specific quality in their own right, which are safeguarded through designations such as Local and National Nature

Reserves, Sites Of Special Scientific Interest and County Wildlife Sites. The SNAs usually do incorporate these designations, but are identified because of the opportunity to build on them.

Further to this, it is important to note that the Strategic Nature Areas (SNAs) that have been used in the Mid Devon GIP are not fully up to date. Those that are used were created by Biodiversity Southwest, but subsequently Devon County Council and Devon Biodiversity Records Centre have refined this regional assessment and identified additional SNAs. In Mid Devon, this includes further areas of purple moor grass / rush pasture and deciduous woodland. It appears that these have not been used in the Mid Devon GIP assessment, as they are not included with the regionally-defined SNAs on the key diagram. The Mid Devon GIP needs to take account of the Devon-refined SNAs on both the key diagram, its other assessments relating to green infrastructure deficiency, and spending proposals.

The Biodiversity Delivery Areas identified by Biodiversity Southwest should also be added to the habitats map. More information about these is available here: <http://www.biodiversitysouthwest.org.uk/bdas.html>

The key diagram features existing regional walking routes and national cycle routes. It would be beneficial to include available information relating to improved or new access routes, as funding for green infrastructure could be used to help fund these. Indicative information is provided through the draft Devon Green Infrastructure Strategy, with further detail also provided through the Devon Rights of Way Improvement Plan. A good example is the current consideration being given to the creation of a new off-road trail based on the disused railway in the Culm Valley between Uffculme and Hemyock.

It is unclear where the information within some of the maps - particularly the 'habitats' map (which is available here: <http://www.middevon.gov.uk/CHttpHandler.ashx?id=16642&p=0>) comes from, for example what is the supplying organisation. It would be useful for those who are interested if this was made available.

## **Allotments**

In terms of allotments, in particular policy GI/5, it appears that the strategy simply seeks to maintain the same number of allotments per person as already exists. However, the National Society of Allotment and Leisure Gardeners recommend 20 standard (300 sq. yd) plots per 1,000 households. It may be appropriate to use this as a target measure rather than seeking to simply maintain the current level. It is this approach which DCC is currently advocating through the Devon GI Strategy.

## **Protection of the Environment**

It is encouraging to see planning policies that concern the protection of the environment being included within this document. However, it is felt that with a few amendments, the policies could be improved. Draft Policy GI/6 focuses on

the provision of green infrastructure in major housing and non-residential development. However, it seems that other development, such as the new highways that are proposed to serve new development (in Tiverton and Cullompton) may escape having to provide green infrastructure to offset their impact. For example, there is specific policy wording in the Mid Devon Allocations and Infrastructure DPD (Policy AL/CU/14 sub section b) that requires that the provision of the Eastern Relief road is subject to 'Provision of replacement open space and sporting facilities within the Cullompton Community Association fields and/or elsewhere in Cullompton'. However, proposed highway in Tiverton is not subject to any such policy, and may well have a green infrastructure impact. The policy should be reworded to ensure that major infrastructure schemes should also have to mitigate green infrastructure impacts.

Furthermore, paragraph 1.26 of the supporting text to policy GI/6 states that a habitat survey should be carried out for the major applications (which is taken to mean those of 10 or more dwellings, or of 1000m<sup>2</sup> non-residential floor space). It is considered that all developments, no matter how small are assessed against a wildlife 'trigger list', as Devon County Council has prepared here: <http://www.devon.gov.uk/wildlifeandgeologytriggerlist.doc>

If any of the triggers are affected then a more full wildlife report should be completed for all applications, no matter what size they are. Guidance on this from Devon County Council is available here:

[http://www.devon.gov.uk/index/environmentplanning/natural\\_environment/wildlife/infoforapplicants.htm](http://www.devon.gov.uk/index/environmentplanning/natural_environment/wildlife/infoforapplicants.htm)

We have similar checklists for impacts on geological features and would recommend a similar approach is also adopted in Mid Devon through policies in the GIP.

Whilst the Plan focuses on the GI improvements to be delivered linked to the planning and development process, it is important that appropriate weight should be given to community engagement in their local environment. Supporting such community involvement, in both auditing and enhancing their local GI assets, is a delivery approach highlighted through the draft Devon GI Strategy. Working together with the Community Council for Devon, a new toolkit is about to be launched intended to promote this approach; whilst its focus is on wildlife interests, it does this in the context of wider GI considerations.

### **Prioritisation of funding**

The indicators of GI as set out in the table beneath paragraph 2.19 are useful in identifying where there are general deficiencies in green infrastructure throughout the district, however, it is felt that it is too simplistic to determine spending priorities. For example, spending priorities need to be managed on a dynamic basis to account for several factors, including where new development occurs, specifically if offsetting of impacts is required, or if

schemes part-funded by other funding sources are coming forward and it is appropriate to use CIL or the New Homes Bonus to supplement them. In addition, spending on biodiversity projects should be prioritised at the Strategic Nature Areas, as these represent the best opportunity for habitat enhancement within the district. In light of these competing factors for prioritisation, it is believed that the prioritisation set out in Policy GI/2, which sets out spending according to the deficiency assessment should be more flexible to account for these different factors. The priority of catchment areas may still be kept as part of this policy, but their importance in defining the spending priorities should be reduced.

Indeed, it is believed that further work to identify the priorities is needed. This should focus on the environmental quality of various areas in Mid Devon, development priorities and also what other environmental / sports / open space schemes are in development. It is recognised that this is a large and complex task and so considered that rather than being part of the green infrastructure plan as re-written following this consultation, would be appropriate to produce a project implementation strategy as an annual report. If Mid Devon District Council agrees this approach, it would be appropriate to mention this specifically in a revised policy GI/7, which addresses monitoring.

In light of the above, it may be appropriate to remove the 'priority area' from the key diagram.

### **The GI requirements table**

Devon County Council is very pleased to see the CIL and the new homes bonus for addressing the cumulative impacts of development on green infrastructure. It would have been preferable to base the costs in the table on local schemes that will be needed to support new development. But, it is recognised that this is not available at present (as often the exact nature of development impacts cannot be known until an application is made). As per other comments in this document, it is considered that a project implementation plan should be developed in the future. Once a full list of specific projects are known, these should be used to calculate the CIL for biodiversity improvements, as this will ensure that the correct amount of money is collected.

There are a few small errors in the table, as follows.

- Amount (Ha) of wetlands to be created is different on both tables, which results in a different figure in both tables.
- The 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, the table would be clearer if there were greater consistency on this.

### **Transport Infrastructure**

With regard to the provision of transport Infrastructure there are two proposed transport schemes that are likely to impact upon GI, these are the Tiverton

Eastern Urban Extension (EUE) Access Routes and the Cullompton Eastern Relief Road. Both schemes are included within the Allocations & Infrastructure DPD.

#### Tiverton EUE Access Routes

The Mid Devon Allocations and Infrastructure Development Plan Document (AIDPD) includes two indicative routes providing road links between the Tiverton EUE and Heathcoat Way and the A361. These routes are subject to detailed design and it is possible that there may need to be some displacement of GI as part of the scheme. In this regard the GI Plan should allow for the replacement in kind of any displaced GI (which can be assumed to be those in the vicinity of the indicative routes). This could be achieved by amending policy GI/6 in the draft GI plan to also ensure that major infrastructure development provides GI.

#### Cullompton Eastern Relief Road

This scheme is shown as an area within the AIDPD. The route will almost certainly involve the displacement of existing GI, and this is recognised in the AIDPD. The GI Plan, or at the very least a subsequent delivery strategy, should make mention of the need to provide GI elsewhere either on allocated GI sites or on new sites which are suitable, this is important to ensure that alternative sites can be delivered effectively.