

ID: 3608
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SUMM:

7 December 2011

Dear Sir / Madam,

Re: Green Infrastructure Plan: Strategy to 2026 and Delivery Plan

Thank you for including the Mid Devon Natural History Society in the distribution of this draft report, and for giving us the opportunity to comment thereon.

We would like to register the following points:

A. The development of Strategic Objective 4 into Policies

Strategic Objective 4 is to improve biodiversity in three areas, namely:

1. Protecting and enhancing recognised sites of particular biodiversity value....
2. Creating new habitats
3. Improving linkages and connectivity between habitats to address habitat fragmentation and isolation of vulnerable species.

We note that all of these are due to be implemented under Policies GI/1, GI/3, GI/4 and GI/6.

It would appear that Policy GI/1 and GI/3 leave the first and second of the above objectives largely in the hands of other agencies. We do not consider this to be unreasonable, because ownership and management of many of these sites is outside MDDC's control (the exception being Local Nature Reserves, for which the Council has specific responsibility and a target, as set out under Policy GI/4).

We do, however, consider that:

- a) it would be prudent for the Council to stand as 'guarantor' for the continued protection of these sites, in a situation where a non-government agency fails, for whatever reason (or, if MDDC is not to be the guarantor, then to state which body will be); and
- b) A plan should be set out to describe how MDDC intends to meet the stated aim of establishing 'a net gain in biodiversity'. The plan should include what the targets will be, how they will be measured and at what frequency they will be monitored over the 15 year period.

Turning to the third of the elements of Objective 4, i.e. 'improving linkages and connectivity between habitats to address habitat fragmentation and isolation of vulnerable species' the Plan makes no mention of any specific measures to be taken (other than 'working with partners'), and no targets are set. We consider that this is an area where the Council can make a significant contribution, because there are some valuable wildlife corridors that pass through Mid Devon. These include rivers, railways (current and disused) and trunk roads. It is acknowledged that corridors which are in private ownership are more difficult to influence than those in Public ownership, so it would make sense to start with the latter. Examples of corridors which are entirely in Public ownership are the M5 motorway and the A361, which have wide embankments suitable for flora

and some families of fauna, if properly managed. These sites do not appear as being of wildlife importance on maps, because, for the most-part, there is no public access and they cannot be surveyed. And yet, on one small section of the A361 embankment to which there is public access and a survey has been carried out by us, the biodiversity was found to be exceptionally good*.

Hence we propose that the Plan be amended to include:

- a) Working with other agencies with a view to have selected areas of these embankments surveyed;
- b) Working with other agencies and with owners of adjacent land to improve connectivity between the sections of habitat with good biodiversity; and
- c) Working with other agencies to ensure that the management regime fulfils the potential for the sites' biodiversity.

**Details can be provided on request.*

B. The shortage of specific, measurable targets for meeting Strategic Objective 4.

In the final page of the document, there is a table of the targets set for each of the 4 Policies by which this Objective is due to be implemented. There are no targets set at all for Policies GI/1, GI/3 and GI/6. It is extremely disappointing that there is only one target set for all of these Policies, that being under Policy GI/4 for the category of Local Nature Reserves (LNRs). It is in our opinion that where there is no target then there is no motivation to make any change, no possibility of measuring performance and ultimately no public accountability. We would like to see a number of ambitious targets set under each Policy, upon which periodic reports of progress are made public. It is understood that Mid Devon District Council is not in a position to implement many actions itself, but it is able to engage with the agencies that do so, and to influence their actions. The targets can be framed accordingly.

C. Points of detail

- **Palmerston Park Woods (LNR)- objective 2&4.** The site should be promoted in terms of its amenity value, particularly to the adjacent housing estate: an exercise trail could be developed; the local community could be involved in it's use; and bird and bat boxes could be erected for wildlife.
- **Tidcombe Fen (SSSI) – objective 3&4.** Greater legal protection should be sought for the fen and its catchment area to preserve this unusual wildlife site of high biodiversity value, whilst also ensuring that it continues to reduce the risk of flooding.
- **Moorhayes (Objective 2 & 4).** Action should be taken to retain as much as possible of the remaining fragments of original habitat from further development. They should be used to improve the health and wellbeing of the local community, to maintain and enhance the biodiversity of the area and to retain wildlife corridors.
- **Wildflower meadows (Objective 2 &4).** Where larger developments (say, over 1 hectare) are being considered, some of the green space should be given over to a wildflower meadow, and a maintenance plan put in place.

- **Wildlife corridors/ponds/wetlands/hedgerows (Objectives 2,3&4).** Planning applications should take into account (insofar as this is not already the case) the need to introduce wildlife corridors, ponds, wetlands and hedgerows, using indigenous species of plants where possible. Guidelines should include swift nest boxes / bricks (lbstock), sparrow and bat tiles and the need to maintain access through the development for hedgehogs with appropriate adjustments to fences.
- **Webcam (Objective 2).** By the installation of a webcam at the nest of a peregrine (or similar), much interest can be generated – other sites have experienced thousands of ‘hits’ during a nesting period.
- **Cycle and footpaths (Objective 3).** These paths should be made and joined up to create routes where people want to go. It is important to consider not only the views of the local population, but also of cycling commuters and of longer-distance cyclists.
- **Rainwater (Objective 3).** Rainwater should be considered as a valuable resource, and where possible (e.g. new developments) captured to create new ponds, lakes, sports facilities and water storage.

General

- **Recycling.** Within the 15 year planning period, it may become possible / viable to recycle other materials for gain within Mid Devon, which would benefit the local economy and reduce transportation. Such opportunities should be sought out and encouraged. Examples of waste materials which are presently processed elsewhere are tyres and plastics, and the recycled products are then transported back to Mid Devon.
- **Light Pollution.** Exmoor National Park has recently been designated as International Dark Sky Reserve which is the first time this prestigious award has been granted in Europe. Every effort should be taken to protect this area from light pollution, and to reduce such pollution elsewhere.
- **Dual use / multi-task** where possible. Can initial and continuing income be generated?
- **Volunteers** can bring diversity, knowledge, skills and enthusiasm. They must be sought out, encouraged and used!

Conclusion

We wish to support the Council in making this Plan succeed and seeing the District, people and wildlife thrive.

As a voluntary natural history society, we offer our cooperation in so doing.

Yours sincerely,

Peter Bowers, Stephen Powles and David Leader

On behalf of Mid Devon Natural History Society

