



ID: 3609  
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Ack: 8.12.11  
SUMM:

8 December 2011

Dear Sir / Madam,

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

Thank you for including Sustainable Villages in the distribution of the draft plan, and for giving us the opportunity to comment thereon.

We would like to register the following comments:

**1. Objective 1: Promote sustainable growth and economic development**

Under this heading comes the objective of promoting and safeguarding local farming and other sustainable production from the land, which feeds through to policies GI / 1 and GI / 5.

The policies give no indication of how this objective will be achieved, other than the provision of a few allotments. Clearly, any new development on farm land will run counter to the objective, raising a dilemma for the Council. We consider that there should be a clear statement of intent to prioritise new developments on brown-field sites, or other land with low potential for biodiversity.

**2. Objective 3: To adapt to and mitigate climate change**

- a) We are surprised, and disappointed, that no mention is made of raising the standard of the existing housing stock in terms of its energy-efficiency or carbon emissions. Improvements made in insulation, draught-proofing, heat-capture etc are fundamental to reducing energy consumption.
- b) We note that although there is the statement that 'green alternatives for travel will be promoted', this is not developed into a policy in GI / 1 and barely touched upon in GI / 6 (major developments). We would like to see a clear policy statement with regard to transport.
- c) We note the statement 'promote low carbon fuels and locally focused consumerism' should be covered under Policy GI / 1. This policy undertakes to 'work with others.... to enhance environmentally sustainable food and fuel production'. The idea is progressed no further and no targets are set. The only relevant policy for which there is a target is for the provision of allotments in various villages (some of which, incidentally, already have them). The target of providing one allotment every 2 years is, quite frankly, pitifully inadequate.

To go some way towards fulfilling the objective of locally focused consumerism, we would expect to see the Council supporting and promoting: farmers' markets; farm shops; local markets (open to any gardener/ smallholder) selling local-produce; community farms; community orchards, and more allotments to meet the demand in villages as and when the existing allotments reach capacity. With regard to local markets and farmers' markets, we should be looking ahead to a time when these all open every day in towns, and at least weekly in every village over a certain size. We would also expect that MDDC should instigate the introduction of locally focused consumerism in all Public institutions, e.g all schools should source their food supplies locally.

Similarly, there is no guidance given about how low carbon fuels will be promoted. Surely, the Council should be seeking out and supporting innovative solutions, such as biomass digesters, combined heat and power plants, harnessing waste heat from industry and green waste sites, wood-chip boilers, hydro-electric power, wind power , solar power etc.? The silence on these matters is disconcerting and lamentable.

### 3. Targets

In the final page of the document, there is a table of the targets set for each of these Policies with which this submission is concerned (GI/1, GI/5 and GI/6). There are no targets set at all for Policies GI/1 and GI/6. As already mentioned, the target for allotments in GI/5 is very disappointing. 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.

Yours sincerely,

Peter Bowers and Gill Gale  
*On behalf of Sustainable Villages*