

GIP
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SUMMARISED:



Response Form

Deadline 9 December 2011

Mid Devon District Council is consulting on proposed new planning policies for:

Meeting Housing Needs (Supplementary Planning Document)

Website link: www.middevon.gov.uk/spd

Green Infrastructure Plan (including Strategy to 2026 and Delivery Plan as Supplementary Planning Document)

Website link: www.middevon.gov.uk/gip

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Comments

Are you
commenting
on

Planning Document
Meeting Housing
Needs Supplementary

Green Infrastructure Plan

(please tick or check the
appropriate box)

☐☒

Please indicate which sections, policies or paragraph numbers your comments refer to

See attached text

Are you

Objecting

Supporting

(please tick or check the appropriate box)

☐☐

See attached text

Please state clearly why you are objecting to or supporting the specified parts of the document/s (continue on a separate sheet if necessary)

See attached text

Would you like to be notified when the Council adopts the documents?

Meeting Housing Needs Supplementary Planning Document

Green Infrastructure Plan (Strategy to 2026 and Delivery Plan)

(please tick or check the appropriate box)

☐☒

Planning Consultation Reponse Form

Are you “objection” or “supporting”

Whilst the Group is pleased to respond, it is not felt appropriate to “object” or “support” and feels that comments on various aspects raised within the documents would be of more value.

The Group is mindful of the overall **Green Infrastructure (GI)** strategy for Mid Devon, but prefers to restrict its comments to those points that are pertinent to its area of concern, namely West Manley Lane Conservation Area (**WMLCA**) as originally outlined in its earlier “**Green Infrastructure –Initial Consultation**” document (**GI-IC**); it would respectfully draw Mid Devon District Council’s attention to that document and the accompanying references, maps and Hedgerow Assessment.

In so doing, it is aware of the *local* thrust of its arguments but points out that much of the substance of the **GI Plan** is already in place within the **WMLCA**, thus allowing the objectives at **GI/1, 3, 4 & 6** to be retained or developed, at little extra cost, for use by a wider town population both for now and for their future. (**Section 2 4.177 & 4.178**)

It is not easy to predict how this **GI Plan** will fit either with the yet to be finalised **Localism Bill (LB)**, the **National Planning Policy Framework (NPPF)** with the suggested **Local Nature Partnerships**, the terms of the **Natural Environment White Paper**, the **National Ecosystem Assessment** and **Nature Improvement Areas**, or with the costs outlined in the **GI Planning Document Section 3 2.8** in the current and on-going financial downturn at both National and local level. (**Section 3 2.7**)

Section 2

2.0 The need for landscape setting and historic environment, local food production and Public Health and wellbeing is already outlined in **GI-IC** and so meets with our agreement.

3.3-3.6. Provided the drafts of **LB** and **NPPF** are carried through, then we would be in agreement with these ideas and would like to be consulted where and when is deemed appropriate.

4.5 Clarification is needed of the “34 species only found in UK 16 are found in Devon”. The Site of Special Scientific Interest (**SSSI**) and the Local Nature Reserve pertinent to the Eastern Urban Development (**EUD**) area are not outlined on the **GIP Key Diagram**.

4.6 Several of the “main threats to biodiversity” (**GIP**) particularly fragmentation and land use change will remain at risk from Tiverton’s proposed **EUD**.

4.7, 4.170, 4.171 Again, the “rich network of wildlife habitats that are linked by hedgerows, woodland and water” already exist in the **WMLCA** and need to be enhanced not threatened by further development.

Consideration might be given to the **WMLCA** coupled with the Tidcombe Fen **SSSI**, the drainage area of Ailsa Brook, Railway Walk and sloping land north of Grand Western Canal **LNR** to becoming a Strategic Nature Area.

Further protection and enhancement of Tidcombe Fen SSSI and its environs might require the additional involvement of Natural England or Devon Wildlife Trust

4.8 It needs to be remembered that the Railway Walk, currently part of Sustrans and a pedestrian track, and part of the **WMLCA**, is the line of the original Brunel's Broad Gauge Railway and might be considered for an historical mention. Other historical and pre-historical remnants lie within the aforementioned curtilage for example, Tiverton Archaeological Group's previous survey of West Manley Farm.

5.5 The Group agrees with the sentiments expressed within the paragraph.

Section 3

1.2 The thinking here is *not* to create anymore deficiencies in the first place and trust that the hidden message is not to simply allow the cheaper option of thoughtless development.

1.3 Many of the strategic objectives outlined are contained in the **WMLCG's GI-IC. (A-E)**

Objective 1:

Whilst paragraph 1 is the goal of EUD, it should not be allowed to override the policies of the succeeding paragraph, much of which already exists in the **WMLCA**. It is paramount that arable land be correctly retained and used; once again it must be emphasised that in Mid Devon, *"tourism"* is *"employment"*. (GI-IC, D)

GI/1, 1.4: WMLCG is in full agreement.

Objective 2:

As outlined in **WMLCG GI-IC**, there is increasing use of **WML** and its connections by pedestrians, cyclists, joggers and horse riders; proof indeed that suitable rights of way are already in existence, should be retained and be enhanced.

Objective 3:

There is ample evidence that local development has interfered with sustainable drainage in this area. The massive civil engineering project that would be needed to protect the SSSI and south of WML from the effects of EUD building and the required sewage disposal would make this undertaking unaffordable. Simply allowing the current natural drainage system to continue would be sensible effective and cheap.

Objective 4:

The improvement of biodiversity and the reduction of habitat fragmentation are at the cornerstone of **WMLCG's** argument and this objective deserves our whole-hearted support.

GI/4: Agreed in principle.

1.14. It is not clear whether Natural England's Accessible Natural Greenspace Standard (ANGSt) applies to current population figures or the projected number within the upcoming development.

1.15. If Mid Devon's "provision" is short at present and likely to worsen with the proposed population increase then for the reasons stated, the declaration of further Local Nature Reserves would seem highly appropriate.

1.16 1.17. Both of these seem to be exciting ideas encouraging mix of local appropriate input with regional expertise.

G1/6: In supporting the outlines of integration, it must be with the knowledge that the provisions are robust and adequately monitored.

Map Page 17: Whilst it is assumed that the illustration is simply an example, the highlighting of "Disused railway footpath and wildlife corridor" suggests this is based on EUD. It lends itself to the interpretation that there is an unacceptable juxtaposition and fragmentation of wildlife and habitat areas with the inevitable decline in species variation.

In conclusion, WMLCG finds much of the publication interesting and stimulating, allowing for the fact that there is still confusion and disagreement on the related outstanding government documents and financial constraints may not allow the full implementation of the admirable plans.

Within the WMLCA, there already can be found wildlife corridors, habitats and inter-connecting human access of the sort that is outlined in the provision of biodiversity and well-being. Without much further expense or construction, the desired environment exists.

DR R W Whittlesey

For and on behalf of

West Manley Lane Conservation Group

05 December 2011