



**MID DEVON LOCAL PLAN REVIEW 2013 – 2033**

Proposed Submission (incorporating proposed modifications) Examination

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**Main Hearings - Hearing 4: Tuesday 19<sup>th</sup> February 2019**

**Matters and Issues**

**Development Management Policies**

**Statement of Mid Devon District Council**

**ISSUE 24**      **Is Draft Policy DM26 (Green Infrastructure in Major Development) reasonable, especially in its approach to viability impacts?**

24.1      Yes, Draft Policy DM26 offers a reasonable approach to the provision of green infrastructure (GI), in a general sense and specifically in relation to viability impacts. The policy should be considered alongside Policy S5 which set local standards for the provision of public open space in new development.

*Reasonable in terms of policy approach*

24.2      Policy DM26 is consistent with the 2012 NPPF paragraph 114 and plans positively for the provision of green infrastructure in major development.

24.3      Policy DM26 requires major development proposals to demonstrate that GI will be incorporated within the site. The policy and supporting text set out the forms that GI can take and the variety of purposes it can serve such as flood attenuation, leisure and recreation and the provision of natural habitats to enhance biodiversity.

24.4      Biodiversity is in long-term decline, with habitats becoming increasingly fragmented and degraded as a result of changing land use and agricultural practices. National policy seeks to reverse this trend, halting overall biodiversity loss and reintroducing well-functioning and coherent ecological networks for the benefit of all. There is an opportunity for development in Mid Devon to play its part in improving the quality and connectivity of green infrastructure (GI).

- 24.5 Policy DM26 is supported by robust evidence through the Green Infrastructure Assessment (GIA) **[ENV14]** and an Open Space and Play Area Strategy (OSPAS) **[ENV06 and ENV07]**.
- 24.6 The Green Infrastructure Assessment (GIA) **[ENV14]** provides a comprehensive analysis of existing environmental assets across Mid Devon, including landscape character types, biodiversity and habitat designations, heritage assets and publicly accessible land.
- 24.7 The GIA splits the district into ‘catchment’ areas with smaller parishes grouped with larger ones; for each area a Green Infrastructure (GI) ‘score’ is calculated based on, amongst other factors: percentage of catchment in reach of accessible open space (Natural England’s Accessible Natural Green Space Standard – ANGSt), total Green Infrastructure (GI) in the catchment area and GI per head of population. Other elements are introduced such as the DCLG’s Indices of Multiple deprivation (IMD) score for social deprivation in order to prioritise the areas for targeted improvements in Green Infrastructure. The priority catchment areas identified are predominantly those in the west of the district such as Coplestone, Bow, Colebrook and Crediton Hamlets.
- 24.8 The Open Space and Play Area Strategy (OSPAS) **[ENV06 and ENV07]** provides an audit of all open space in Mid Devon, assessing the amount quality and fitness for purpose. It has been informed through the findings of the GIA **[ENV14]**. The OSPAS makes recommendations for how the Council should prioritise investment and plan for new development, based on a robust assessment of need. The OSPAS also provides information to justify the collection of developer contributions to open space based on: capital costs of provision, maintenance contributions, eligible types of development and appropriate thresholds for on site or off site provision.

*Reasonable in terms of viability impacts*

- 24.9 The Local Plan Review’s open space requirements in Policy S5 have been tested through the Viability Assessment 2014 in its addendum (**HOU05**). Paragraph 2.1.11 of that viability assessment recommends that the open space policy should be applied with flexibility given the impact on viability in some more marginal scenarios. The Local Plan has responded to this and allows for some flexibility in recognition that not all sites may be able to fund the full cost of the off-site contributions towards open space. Therefore, the Council will consider a reduced contribution where it can be demonstrated that payment of the full cost would make the development unviable. Further details on the policy’s application, including information on the consideration and submission of viability evidence will be set out in a review of the existing Open Space Supplementary Planning Document, to be undertaken after the adoption of the Local Plan.
- 24.10 Policy DM26 provides a reasonable approach to the provision of other GI in major development where this would impact on viability. The last paragraph makes clear that ‘where evidence demonstrates that meeting these criteria in full [the criteria of Policy DM26] would render the development unachievable, the Council will balance the benefits of the development against the objectives of this policy.’ Policy DM26 also provides flexibility

to allow, where appropriate, contributions towards off-site green infrastructure where on-site green infrastructure is unfavourable.