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Dear Sir/Madam

Plan Mid Devon Issues Paper – DWT response

Thank you for the opportunity to respond to the Plan Mid Devon Issues Paper. We restrict our response to matters relating to biodiversity and the environment.

Question 1: Do you agree with the top 6 priorities that we have identified for the new Local Plan?

- Priority 1: We welcome the council's ambition to become carbon neutral by 2030. However, we highlight the link between climate and biodiversity emergencies and the need to seek a joined-up approach to tackling these. For example, moving away from carbon emitting land uses such as intensive arable to carbon sequestering habitats such as wildlife-rich woodlands, wetlands and grasslands will help tackle both emergencies. Seeking middle-ground solutions such as regenerative agriculture will be key solutions alongside wider nature recovery.
- Priority 2: This section mentions the need for access to 'open space'. Research¹ suggests that access to nature-rich green space is beneficial to health and wellbeing. By focussing effort on creating meaningful access to high quality nature-rich green space, social and environmental benefits will be achieved, especially where such green spaces are guided by the Local Nature Recovery Strategy/Nature Recovery Network Map.
- Priority 3: The statement in 2.21 that "*This area is mostly countryside, which supports biodiversity...*" is misleading. The majority of the countryside is agricultural land, much of which is intensively managed and hence supports relatively little biodiversity². The perception that green agricultural fields are good for nature is outdated and inaccurate – the two greatest factors in the decline of nature are development and intensive agriculture. This paragraph also mentions the rivers Exe, Creedy and Culm – all of which have failing water quality and significant flooding issues, impacting on people and

¹ https://www.wildlifetrusts.org/sites/default/files/2018-05/r1_literature_review_wellbeing_benefits_of_wild_places_lres.pdf

² <http://www.sussex.ac.uk/lifesci/goulsonlab/blog/biodiversity>



wildlife. The role of nature-based solutions and ‘making space for water’ will be critical in addressing these issues going forward.

The recent Environment Act 2021 requires Local Authorities to prepare Local Nature Recovery Strategies to guide their nature conservation and enhancement duties. Under this Act, Local Authorities must also ensure planning applications deliver a minimum 10% Biodiversity Net Gain – we strongly recommend Mid Devon move to 20% BNG as described later in our response.

DWT urges Mid Devon to strengthen the wording around the need for nature recovery at a large scale, in reflection of both the Environment Act 2021 and the biodiversity emergency. This should highlight the need for large scale habitat restoration/creation guided by the Devon Nature Recovery Network³ and aiming for at least 30% of the district’s area to support nature-rich habitats in accordance with UK government and international (Convention on Biological Diversity) commitments and targets.

- Priority 6: DWT stresses the need to move to a green, sustainable economy – in order to address climate and biodiversity emergencies. Sustainable agriculture and nature recovery will be central to this.

Question 2: What parts of this vision do you think should be kept and what parts should be changed, and why?

- The only mention of the environment in this ‘vision’ is “...a clean, green, safe environment”. This is a weak ambition that fails to address the biodiversity emergency, national and international ambitions and targets, or the benefits that a thriving nature-rich environment brings to people. The vision should include:
 - At least 30% of Mid Devon will support protected nature-rich habitats, delivering a Nature Recovery Network that tackles the climate and biodiversity crises, while bringing a wealth of other benefits to our people and places.

Question 3: Do you think that the Local Plan should introduce policies requiring that all developments which propose the construction of new homes or non-residential floorspace will be designed, constructed and will perform to deliver net-zero carbon emissions?

- Yes, as a minimum. Wherever possible developments should strive to be carbon positive – sequestering far more carbon than they use.
- We welcome the mention of the link between climate change and biodiversity loss in para 4.1. However, this link should be demonstrated far more robustly throughout this document, including the council’s response through its local plan. Nature recovery should be highlighted as a critical measure.
- Para 4.1 mentions the use of materials to manage overheating and barely touches on green and blue infrastructure. The use of trees and native vegetation in creating shade and humidity, and the use of semi-natural habitats and native species such as beavers in attenuating flood risk and enhancing water quality

³ <https://www.devonlnp.org.uk/our-work/nature-recovery-network/>



should all be highlighted here – these are low-cost multiple-benefit solutions that should be central to the approach to tackling climate change.

- Para 4.2 – we welcome Step 2 approach of on-site renewable energy. This should be built into all new development. By demanding multiple use of all developments (e.g. solar PV and thermal on all roofs), this will reduce the need for off-site renewable energy generation.
- Step 3 recognises the need for building quality standards. DWT encourages the council to use the Building With Nature⁴ accreditation scheme to ensure development delivers maximum environmental and biodiversity benefits.

Question 5: How do you think we should plan the future of Mid Devon to help reduce the need to travel by car?

- No comment

Question 6: How do you think the new Local Plan should plan for renewable energy developments?

- DWT supports a move to renewable energy. However, this should not be at the expense of biodiversity.
- Solar farms, if designed and delivered carefully, can provide significant areas of new semi-natural habitat creation, but many are delivered on existing semi-improved grassland and result in little new habitat and often loss of value to nature. Ensuring significant biodiversity net gain from such sites is critical.
- Wind turbines are demonstrated to impact on mobile species such as bats and birds. Avoiding sensitive areas and designing wind farms to avoid impacts on vulnerable species is essential. Distributed wind (using smaller turbines in more sites) should be considered where this helps reduce impacts on wildlife.

Question 7: Which renewable energy technologies should be prioritised in Mid Devon?

- For renewable energy to provide a genuine alternative to fossil fuels, a wide range of technologies should be employed.
- Onshore wind - Yes
- Solar Photovoltaic (PV) - Yes
- Small scale hydro – Yes but only where impacts on the water environment and especially on fish passage can be avoided
- Biomass energy – Yes but care should be taken to avoid displacement of other land uses into sensitive areas in order to provide sufficient biomass production. Also some biomass crops can result in negative impacts on soils and water quality – anything which results in this, must be avoided, with sufficient safeguards in place and ultimately the ability to turn down applications where sustainable environmentally sensitive supply cannot be guaranteed.
- Energy from waste – Yes but safeguards should be made against perverse decisions – e.g. the priority should be to reduce, re-use and then recycle 'waste' and only where these are not possible should energy from waste be considered.

⁴ <https://www.buildingwithnature.org.uk/>



- Anaerobic Digestion (AD) – No. The impacts of AD plants across Devon have been disastrous for soils, water and biodiversity. Crops grown for these plants are often inappropriate for the soils, are highly intensive, result in poor soils and result in excessive pollution and run-off. In addition, AD plant digestate which needs to be removed from the plant, is often used inappropriately on land, with resulting consequences for soils, water and biodiversity. On top of this, Grade 1 agricultural land is often used for AD plant crops, displacing intensive food production onto inappropriate land.
- Heat networks - Yes
- Solar thermal - Yes
- Heat pumps - Yes

Question 8: Are there any other measures in relation to the development and use of land and buildings that you think the Local Plan should consider to help address climate change and help us move towards a low carbon future?

- Please see earlier comments on linking climate and biodiversity emergencies and securing multiple benefits from nature-based solutions and nature recovery.

Questions 9 – 19

- No comment

Questions 20 - 22

- DWT has no comment about the wider question of whether One Planet Developments should be introduced or whether Plan Mid Devon should prioritise new permanent sites to provide homes for Gypsies and Travellers.
- As with all sites, it is critical that any development avoids loss of habitats and species and are also subject to a biodiversity net gain of at least 10%. This is no different for One Planet Developments or Gypsy and Traveller Accommodation.
- We support the need for a management plan that includes how biodiversity will be managed and enhanced

Question 23: How do you think we should plan for a green economic recovery in Mid Devon?

- Protecting the natural environment to sequester carbon/farm diversification: clearly in a rural area like Mid Devon, restoring a landscape rich in nature that sequesters carbon, alleviates the impacts of climate change and provides a range of income streams for farmers is the highest priority for creating a green economy. Ensuring these changes are guided strategically by the Devon Nature Recovery Network/Local Nature Recovery Strategy will be essential if the benefits are to be realised.
- Renewable energy/Green public transport, cycling and walking/Greener more energy efficient buildings/Refurbishing and retrofitting properties to meet energy standards: renewable energy if carefully planned and managed can deliver the climate change benefits while delivering biodiversity benefits. To do this, Mid



Devon should ensure firstly an efficient system, and then that renewables are carefully placed to avoid impacts on nature while delivering a significant net gain.

- Mid Devon should also ensure that all sectors become greener – doing away with polluting activities, actively seeking opportunities for nature recovery and enabling daily contact with nature for all.

Question 24: Which of the following ways should the new Local Plan help commercial development across the district?

- No comment

Question 25: What do you consider to be the key infrastructure issues that Plan Mid Devon needs to address?

- No comment to specific infrastructure issues
- We highlight the new requirement, under the Environment Act 2021, for infrastructure projects to deliver a biodiversity net gain of at least 10%. The Devon Nature Recovery Network Map, under the Local Nature Recovery Strategy, is a key tool for determining where such gain should be implemented.

Question 26: Please select your top three priorities for the new Local Plan to address in a review of parking standards.

- No comment

Question 27: Do you have any comments on how Plan Mid Devon can help the transition to electric vehicles?

- Please our earlier points around renewable energy (Q 6-7)

Question 28: Are there any other areas in Mid Devon that you think should be designated as a 'Local Green Space', and please tell us why?

- DWT supports communities in designating Local Green Space where these protect and maintain/enhance habitats and areas where people can engage with nature.
- Landscape character will need to take account of a dynamic landscape, particularly where both climate change may impact current features and where nature recovery will create positive change. Allowing flexibility in LCAs/LCTs will be critical going forwards, particularly taking account of the Devon Nature Recovery Network.

Question 29: What do you think the minimum level of Biodiversity Net Gain that the new Local Plan should set?

- DWT welcomes Plan Mid Devon including the option for greater than minimum BNG and we urge Mid Devon to pursue at least 20% BNG. While 10% is a marked step forward from the 'no net loss' approach of the past, there is a risk that very little gain will be achieved through this, as metrics are crude tools and those using them are likely to undervalue existing habitats/features and overvalue proposed enhancements. 20% would require a genuine gain across the board and is achievable. In this time of biodiversity crisis as described in the



consultation document, Mid Devon should aspire to be a leader in nature recovery, particularly as it can provide the link between so many important sites and landscapes for nature.

- We highlight the need for a strict mitigation hierarchy to be pursued for ALL development and for the need of clarity in separating this from the BNG requirement.
- We note the comments around landscape character but highlight the need for landscape change to enable nature recovery and adaptation to climate change – alongside the changes that climate change will bring in and of itself. The Devon Nature Recovery Network Mapping should be used here to understand likely changes.

Question 30: In addition to securing tree planting along new streets and walking / cycle paths and as part of green infrastructure, should Plan Mid Devon include a prescribed level of tree planting in new development?

- Yes. Plan Mid Devon should be aiming for 30% of the area to support nature-rich habitats by 2030 (and more beyond that) in line with UK and international ambitions and that should include a significant amount of tree and woodland planting. It would be reasonable to aim for 15-20% woodland coverage of the district with the vast majority being native broadleaf woodlands. This should include a mix of dense woodlands and woodland mosaics that incorporate open habitats within them.
- The statement that non-natives should be considered under climate change adaptation should be removed and under no circumstances should this approach be pursued. Non-native species have caused billions of pounds worth of damage to the UK⁵ and have disastrous impacts on native habitats, species and ecosystems. The UK (and Mid Devon) has a highly adaptable biota but this needs space, time and protection to realise this. The small fragments of habitats remaining in our landscape are highly susceptible to change, but larger areas of complex habitats and habitat mosaics are resilient and adaptable. The focus must be on creating more space for nature with the focus on natural processes and ecosystems.
- This section places a very strong emphasis on trees but relatively little on other habitats, ecosystems, species and habitat mosaics. Indeed, even the woodland creation drive has missed one of the most critical elements of woodland ecosystems – that of restoring/creating woodland flora alongside simply planting trees. The Mid Devon Local Plan should recognise the need for making space for nature and natural processes, which should include this wide array of habitats and species, not just focus on woodlands. The climate benefits of woodlands are more likely to be realised if whole ecosystems are created. A good example of another ecosystem that needs to be restored lies in the Culm Grasslands that are mentioned in relation to the neighbouring SAC. These species-rich habitats sequester large amounts of carbon and provide a water environment benefit as they store and filter water – alongside supporting rare species such as marsh

⁵ <https://neobiota.pensoft.net/article/59743/>



fritillary. With such habitats found in North Devon, Dartmoor, Exmoor and on the Blackdown Hills, Mid Devon should be seeking to create this habitat (among others) to provide the networks of habitats that enable nature recovery and connections between these important areas – enabling marsh fritillary to establish new colonies and link up metapopulations across the region. The Devon Nature Recovery Network Mapping will be invaluable in determining which habitats could/should be created where.

- We welcome mention of ancient and irreplaceable habitats/features and the protection they should be given. We would ask that veteran trees, alongside woodlands and other habitats that have existed since the Tithe Map/first edition OS map should be afforded the same level of protection as these support complex habitats with soil characteristics that could not be replaced.

Question 31: Are there any specific parts of the Grand Western Canal that should be given more protection and why?

- No comment on specific parts of Grand Western Canal, but we call for a wider belt of land around the canal to be protected and restored to nature-rich land that can act as a key corridor for wildlife across this part of the district.
- In relation to nutrient management, which is mentioned in the consultation document just before this, we recommend that Mid Devon learn from the Somerset Levels and the Judicial Review proceedings affecting the River Axe SAC. Development and agricultural change impacts the water environment downstream and it is critical this is taken into account at Local Plan stage. We should not wait for water quality to get so bad that nutrient management zones or legal proceedings demand stringent measures to protect water. Instead a proactive approach should be adopted to protect water. This is especially important for Mid Devon as the majority of the district drains into the Exe Estuary SPA/Ramsar Site or the Taw/Torridge Estuary SSSI – both of which have numerous other national and international designations.
- We welcome mention of the Local Nature Recovery Strategy and Nature Recovery Network. We urge Mid Devon to be ambitious in its nature recovery agenda, with large scale restoration of natural and semi-natural habitats and ecosystems that support species and natural processes across the district.
- We highlight the need for space to be given around the water environment particularly in light of the return of beavers to the English landscape and the population on the adjacent River Otter. Ensuring Mid Devon is 'beaver ready' will be critical if we are to realise the step-change benefits beavers can bring while managing the challenges that come with this keystone species.

Question 32: Please select what you think should be the top three measures in terms of their importance in the planning our places to encourage and support healthy lifestyles

- Improving habitats and biodiversity
- Opportunities and access to open space and play and recreation
- Opportunities for active travel, including walking and cycle routes



- It is important that Green and Blue infrastructure create areas/networks where nature can thrive alongside people but also critically where it can be given space away from people.

Question 33: National Planning policy and guidance does not define what is meant by 'beauty' in design. What aspects of design, such as layout, architecture or landscape elements, do you think would contribute to create beautiful places and buildings?

- We encourage Mid Devon to use the Building with Nature⁶ accreditation for its Local Plan and future development to ensure nature and the wider environment, including access to that, are properly designed into plans and delivered by developers

Question 34: How should we prioritise the planning of Tiverton, Cullompton and Crediton town centres?

- No comment on main issue
- DWT encourages the 'greening' of urban areas enabling equal access to nature for all. Town centres with nature-rich habitats at their centre and with wildlife corridors connecting these to the surrounding countryside provide healthy towns and villages where residents are connected to nature.

Questions 35-48

- No comment

Question 49: What types of non-farming activity do you think should be supported in the countryside and why?

- All activities that support nature recovery should be supported including associated requirements such as tree nurseries and 'seed hubs' for producing native trees and seed to enable habitat restoration.
- We raise the issue that while Agricultural Land Classification of 1 to 3a are protected for agriculture, ALC 3b-5 are often the areas that support (or have potential to support) the most valuable habitats and species. We encourage Mid Devon to consider the existing and potential value of land for nature recovery alongside that for agriculture to ensure development pressure isn't confined to these areas.

Question 50: What types of non-farming activity do you think should NOT be supported in the countryside and why?

- Agriculture should not be seen as one sector that is all good for the environment. Modern agriculture is often intensive and can have negative (and sometimes disastrous) consequences for nature. Careful scrutiny of agricultural development should be made to ensure it fits with climate and biodiversity/nature recovery and does not create pollution.

⁶ <https://www.buildingwithnature.org.uk/>



- Anaerobic digestors can encourage poor land use decision making with inappropriate agriculture causing pollution and environmental harm. Their digestate can cause pollution incidents and are often spread on land inappropriately. AD plants should generally be avoided.

Question 51: How should the Council provide more support for the growth and prosperity of the rural economy?

- No comment apart from previous responses (e.g. Q23, Q49) around green economy and nature recovery

Question 52: What things do you think should be included in the planning of the Culm Garden Village to make it a successful place to live, work and visit?

- The number 1 feature for the Culm Garden Village should be a nature-rich village incorporating a network of wildlife corridors and green spaces that link across the village connecting the country parks and wider countryside, based around key watercourses and other natural features. These should provide a mosaic of habitats linking woodlands, grasslands and wetlands with some areas of shared use with people and others as sanctuary areas for wildlife. Making space for water will be critical to this as beavers are likely to be a feature of this area (expanding from the River Otter), so siting infrastructure away from watercourses and allowing flooding in these areas will be critical.
- The next point (2) will be to ensure that people connect with nature as a core function of the village. This means creating networks of nature-rich pathways and cycleways and public focal areas (like high streets, shopping, pubs, gathering spaces) are focussed around nature-rich green spaces and village greens. Alongside this, all streets should have wildlife-rich verges and lines of trees providing the nature benefits to people of health and wellbeing, cooling, evening-out of temperatures, water quality and quantity and just the happiness of being surrounded by nature.

Question 53

- No comment except that all new developments should avoid loss of wildlife, deliver biodiversity net gain, deliver the Devon Nature Recovery Network/LNRS and seek to integrate nature and people.

Questions 54 - 56

- No comment

Yours sincerely

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