



# SIDMOUTH ARBORETUM

Caring for the trees of the Sid Valley

## **EDDC Local Plan 2020-2040**

### **A response from Sidmouth Arboretum**

East Devon is one of the most desirable areas of England in which to make a home. One reason is its greenness. Not the metaphorical greenness of fibre optic cables and home insulation although that is very important, but the physical greenness of the rolling landscape. Our mature trees and hedgerows are an integral component of that greenness.

Currently, much is being said about the value of trees and hedgerows as sinks in which to sequester carbon, but that is not their principal benefit that makes them valuable. Mature trees and hedgerows make East Devon a better place to live.

There is solid evidence that the presence of mature trees and hedgerows benefit people's physical and mental health, they mitigate urban environmental pollution of many types, they mitigate the worst effects of extreme weather events such as flooding and soil erosion, they support a huge range of biodiversity which in turn makes the area more sustainable for the human population.

The East Devon Local Plan is concerned with development and too often development threatens mature trees and hedgerows. Sadly, the current tree protection system is incapable of offering protection to the majority of mature trees in East Devon because of the vague legislation associated with tree protection orders (TPOs) and the lack of resources available to the EDDC Tree Officers.

It is particularly important that mature trees and hedgerows are kept wherever possible. Their removal cannot be mitigated effectively by new planting. No matter how many whips are planted, they will not replace the environmental services provided by the lost resources for many decades and perhaps as long as a century into the future.

Sidmouth Arboretum welcomes many of the draft policies in the Local Plan that aim to protect the environment and keep the area as a desirable place to live, but some of those policies could be framed to offer even more protection for our trees and hedgerows. We offer the following responses to particular sections of the draft East Devon Local Plan 2020-2040.

### **2.5 Plan Objectives**

Protecting mature trees and hedgerows, plus well-planned planting of new trees and hedgerows should be a key and explicitly defined component of measures aimed at the following objectives:

1. Designing for health and well-being
2. Tackling the climate emergency
6. Designing beautiful and healthy spaces

8. Protecting and enhancing our outstanding natural environment and supporting an increase in biodiversity.

### **8 Strategic Policy – Development of a new town east of Exeter**

This policy mentions open spaces and there are other references to the quality of open spaces elsewhere in the draft policy, particularly in reference to the Clyst Valley. Sidmouth Arboretum believes that the policy would be strengthened if specific mention was made of protecting existing mature trees and hedgerows as the new town develops.

Section 4 on the town centre would be strengthened if there was a specific mention of the beneficial effect of and a numerical target for canopy cover. If the target canopy cover was included, then some pre-emptive planting could begin as soon as the layout of the town centre was known. There would then be trees of a reasonable size on site when the first phases were ready for occupation.

Section 6 on infrastructure mentions 254Ha of land for Green Infrastructure (GI) and this appears to be only the metaphorical greenness. This section would be strengthened if it included a commitment to maintaining and increasing the population of mature trees and hedgerows as living infrastructure. Perhaps you could emulate the Master Plan devised for Milton Keynes as far back as which decreed it should be defined as the 'city of trees' with another explicit commitment to a percentage of canopy cover.

### **12 Strategic Policy – High quality employment north of Sowton village**

This policy talks about high quality development being essential but there is no indication of what that means. The proximity to the village suggests that a green screen would be of benefit. The policy would be strengthened if there was a specific mention of the use of trees around the site perimeter to act as a screen. As with the new town centre, pre-emptive planting of trees on the boundary of the proposed site would mean the tree screen could grow sufficiently to act as a screen even as the building work was going on.

### **16 Strategic Policy – Green Infrastructure and the Clyst Valley Regional Park**

Sidmouth Arboretum welcomes the proposals for the CVRP, particularly raising the canopy cover from 10% to 30%. We note that the Park's objectives open with the role of true greenness in promoting health and wellbeing.

### **27 Strategic Policy – Climate Emergency**

Currently, many organisations are planting new trees, woodlands and hedgerows to offset carbon emissions. Providing, transporting and actually planting these whips has a carbon cost and these plantations will not have grown enough to move into positive sequestration for a number of years. Retaining a mature tree will contribute to carbon sequestration immediately and a healthy mature tree will sequester more carbon than many whips.

Policy 27 stresses the importance of retaining existing buildings. It would strengthen the policy if it had a fourth action, retaining existing mature trees and hedgerows where possible.

### **60 Policy – Sustainable Tourism**

Tourism is a major industry for East Devon, as was said above, our trees and hedgerows play a major part in creating an attractive place to visit.

The list of criteria that new tourist attractions, facilities or accommodation contains the tautologies that unacceptable adverse impacts will not be accepted and that protected species should not suffer adverse impacts.

Apart from that, the policy would be stronger if there was a specific mention of the mature trees and hedgerows that typify the surrounding natural environment of most of rural East Devon.

#### **62 Policy – Design and Local Distinctiveness**

4. Sidmouth Arboretum believes that the majority of trees and hedgerows are worthy of retention.

#### **74 Policy – Landscape Features**

Sidmouth Arboretum welcomes Policy 74, but the hedgerows of East Devon are possibly as important to the local character and biodiversity as any ancient woodland and most are irreplaceable effectively. We have to repeat that compensatory planting cannot replace a removed hedgerow successfully until many years have passed.

In the unfortunate circumstance that a hedge is removed, the specification of native species may be overtaken by the effects of climate change. We suggest the word native is replaced with appropriate species.

#### **85 Policy – Protection of irreplaceable habits and important features**

As was said above, the majority of the District's hedgerows are important and irreplaceable effectively, even the small number that will be outside the Hedgerow Regulations 1997 by a quirk of location. For example a healthy hedgerow might not meet another hedgerow at one end which can happen as historic neighbouring hedgerows have failed through previous neglect.

#### **87 Policy – Biodiversity Net Gain**

Paragraph 13.41 refers to the many important sites and habitats in East Devon that are small, sporadic and exist in isolation. This is one of the reasons that our hedgerows are so important and the Local Plan should contain strong restrictions on their removal and possibly include obligations on developers to increase the lengths of hedgerows associated with their sites.

#### **91 Policy – Ecological enhancements and incorporation of design features to maximise biodiversity value of proposals**

Most of the design features listed are associated with the buildings. Sidmouth Arboretum suggests the small number of site features should include the planting of trees and hedgerows explicitly to reinforce their importance.

Sidmouth Arboretum would welcome the opportunity to contribute to the development of design guidelines for all development and comment on developers' proposals to ensure that retention of trees and hedgerows is prioritised wherever possible and any replacement will provide appropriate mitigation to maintain current, and enhance future levels, of biodiversity.