

## Sid Valley Biodiversity Group submission to the draft East Devon Local Plan



The District, along with the rest of the world, is facing a climate emergency [Strategic Policy 7 of the draft Local Plan] – and the Sid Valley Biodiversity Group welcomes the recognition that we are facing a “combined biodiversity and climate emergency” [Policy 87] – and specifically at point 13.38, that “the planet is facing an ecological emergency”.

The SVBG therefore supports the approach, objectives and policies of **Chapter 12 Caring for our outstanding landscape, Chapter 13 Protecting and enhancing our outstanding biodiversity and geodiversity**, and those **Policies focussing on protecting and enhancing biodiversity** of the emerging East Devon Local Plan.

### **Nature Recovery Networks:**

The inclusion of “Strategic Policy 88 – Local Nature Recovery Strategy and Nature Recovery Network” is to be welcomed. This will help to deliver the aspirations set out in the Nature Recovery Green Paper: “UK Government has set out a new framework of environmental targets under the Environment Act 2021 (the Environment Act). This includes an ambitious target on species abundance, with the objective to halt the decline in nature by 2030. The UK Government has also committed to protect 30 per cent of our land and sea by 2030 (‘30 by 30’), and to reach net zero emissions by 2050. Nature will play a crucial role in delivering our climate targets, particularly as a carbon sink, and in improving our climate resilience.”

Secondly, within the Sid Valley, there are already several sites protected by SACs, SSSIs, National Nature Reserve (Mutters Moor) and a Local Nature Reserve (Fire Beacon Hill), Marine Coastal Zones, and Irreplaceable Habitat, which includes ancient woodland and ancient and veteran trees.

**The SVBG would request that the draft Local Plan includes the list of [protected sites](#), identification of irreplaceable habitat and ensure the Plan is compliant with [government policy on ancient and native woodland](#).**

Finally, the SVBG is currently working on contributing to a Nature Recovery Plan for the Sid Valley which will hopefully be added to the District Council's own ongoing policy-making: [Nature Recovery - East Devon](#)

### **Biodiversity Net Gain:**

Biodiversity net gain becomes mandatory this year ([Biodiversity Net Gain for local authorities | Local Government Association](#)) where developers must deliver a 10% improvement for biodiversity. The SVBG therefore welcomes the provision within the draft Local Plan for 20% improvement under Policies 84 and 87.

### **Biodiversity Action Plan:**

The SVNP is possibly one of the few Neighbourhood Plans which promotes the creation of a Biodiversity Action Plan – which has already been carried out in collaboration with Sidmouth Town Council – and yet there is no mention in the “Key messages from the Neighbourhood Plan for the area” of the Sid Valley.

**The SVBG would therefore request that the draft Local Plan includes reference to the Biodiversity Action Plan as promoted by the SVNP.**

### **Green Corridors:**

The SVBG also welcomes the inclusion within the draft Local Plan of wildlife corridors and habitat at Policy 78 – although whereas many other planning authorities refer to 'blue corridors' in their local plans, there is no mention of these as such in the East Devon local plan.

Also disappointing is that, under the “Key messages from the Neighbourhood Plan for the area” of the Sid Valley, there is no mention of any the SVNP's 'green' policies, despite the general 'green' approach in the draft Local Plan.

On the other hand, there are several mentions of 'green corridor' in relation to other settlements, including Exmouth, Uplyme and Westclyst – and yet not for the Sid Valley, where the SVNP contains a specific Policy (number 4) as well as references to specific green corridors, including the Byes park along the blue corridor of the River Sid.

**The SVBG would therefore request that the draft Local Plan includes reference to the 'green corridors' of the Sid Valley, as referenced in the SVNP.**

### **Priority Habitats:**

The SVBG welcomes the inclusion within first paragraph of Chapter 13 the draft Local Plan of the District's extensive network of priority habitats and protected species

### **Landscape Features and Irreplaceable Habitats:**

The SVBG also welcomes the determination of the draft Local Plan both to protect the District's landscape features against harmful development under Policy 74 and to protect irreplaceable habitats and important features under Policy 85 – in particular, important hedges.

The SVBG would further like to draw attention to the fact that ancient and veteran trees are included in the definition of irreplaceable habitat within the National Planning Policy Framework – making it all the more important to protect and enhance the distinctive network of hedgerows and hedgerow trees throughout the District.

### **Historic Environment:**

The SVBG also welcomes the determination of the draft Local Plan both to protect the District's historic environment – both the human and natural – under Policies 102 and 106.

### **Design and Local Distinctiveness:**

The SVBG also welcomes the determination of the draft Local Plan both to protect the District's design and local distinctiveness under Policy 62 – in particular trees and hedgerows worthy of retention.

### **Rain gardens:**

The SVBG also welcomes the inclusion of references in the draft Local Plan to permeable areas for gardens at Policy 45 – although there could be more robust recommendation for 'rain gardens' to be provided to ensure the same policy outcomes.

### **Sustainable Drainage Systems:**

It is disappointing that there is no insistence in the draft Local Plan to the use of SUDS schemes, in particular for new developments.

In view of the comments made above, the SVBG would like to make the following further comments and requests on the specific site proposed for housing development.

### **Land south west of Woolbrook Road (Sidm\_01)**

**1:** The site clearly constitutes a **wildlife corridor and habitat** [draft Local Plan Policy 78]

**2.** If the development were to progress, the SVBG would like to highlight that part of the site is within the **flood zone** and that any development should be significantly above the current and any likely future flood zones, taking into account the impact of climate change. The SVBG would welcome the retention and expansion of the hedgerow to create a wider wooded buffer along the boundary with the road, which would help to reduce flood risk whilst also providing a wildlife corridor. [See the suggested riparian woodland footprint from EA's "working with natural processes" map.]

The SVBG would urge that any development on the site includes natural systems for **flooding mitigation**, including measures such as rain gardens and a robust SUDS scheme.

**3:** Some of the woodland within the allocated site is **priority habitat** [draft Local Plan Chapter 13] as identified on the Priority Habitat Inventory. The SVBG would urge that this priority habitat is retained and extended to the south and west. Species and Habitats of Principal Importance should be protected under section 41 of the Natural Environment and Rural Communities Act 2006. It is worth noting that this tiny woodland may be the last remnant of a larger ancient woodland, now lost, as evidenced by field names in the 1830 tithe map. [See map.] An ecological survey will identify whether any ancient woodland characteristics remain and should be protected.

The SVBG would urge that the boundary with the old railway line is protected and extended since it is currently a rich wildlife corridor, partly due to the many mature, dead and dying trees, including ash; these will be important for bats and invertebrates and should be retained wherever possible. The line should not be opened up for recreation, since this would inevitably lead to the removal of this important stock of veteran trees and standing dead wood. If recreational routes are needed, then agreeing access to the fields above the railway line (to the north west) would be a better choice.

**4:** The **historic environment and local distinctiveness** [draft Local Plan Policies 62, 102 and 106] are important aspects of this site. The SVBG would urge that these are therefore protected.

Archaeological surveys nearby have provided considerable evidence of early occupation. The Historic Environment layer of the Devon Environment Viewer has this as a find site for 352 Mesolithic flint pieces. Greenway Lane is the old Roman Road. And an archaeological survey has included ancient boundary banks along Greenway and throughout the site.

**5.** In summary, if the development were to progress, it should be set within **woodland and hedgerows/hedgebanks** [draft Local Plan Policies 62, 74 and 85] to as great an extent as possible, retaining and expanding the woodland to the northwest of the site, creating links for wildlife on all sides of the development and giving room for natural flooding of the river and development of wet woodland habitats.

**The SVBG holds a neutral position with regard to the inclusion of the site for housing development**

## Conclusion:

To reiterate from the above introduction, the SVBG welcomes the recognition that we are facing a “combined biodiversity and climate emergency” (Policy 87) – and specifically at point 13.38, that “the planet is facing an ecological emergency”.

The SVBG therefore welcomes the inclusion of Policies 84 and 85, which seek to prevent the destruction of 'important habitats' and the destruction or degradation of 'irreplaceable habitats', respectively – as “Some habitats are considered to be irreplaceable due to the fact that they are incredibly technically difficult (or take a very significant amount of time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.”

And, to reiterate the above points under Nature Recovery, the SVBG therefore welcomes the protection of sites such as SACs, SSSIs, Nature Reserves, Marine Coastal Zones and Irreplaceable Habitat, which includes ancient woodland and ancient and veteran trees.

However, the SVBG would argue that the 'commonplace' is also vital as we face the biodiversity emergency – that, not only 'Special verges' under Policy 84 should be recognised as needing protection, but indeed all verges as we face the ongoing catastrophic collapse of insect populations; that, not only 'important bird populations' on the Exe Estuary and on the Pebblebed Heaths at point 6.16 should be recognised as needing protection, but indeed all bird populations as we face the catastrophic collapse of bird populations due to the current avian flu epidemic.

The SVBG therefore welcomes the inclusion of Policy 91 and the ecological enhancement and incorporation of design features to maximize the biodiversity, such as integrated bird and bat boxes; and the inclusion of Policies 77 and 82 which deal with light pollution.

**However, the SVBG considers that these measures are not enough to deal with the biodiversity emergency – and would therefore urge the draft Local Plan to demonstrate much more ambition and many more specific policy proposals on how to do so.**

The SVBG welcomes the declarations made in the introduction to Chapter 13 Protecting and enhancing our outstanding biodiversity – that “our biodiversity and geodiversity is intrinsically linked to and often threatened by a range of factors, including climate change, agriculture, pollution, land use change, urbanisation and increasing human populations.”

Nevertheless, the SVBG would note that much of the draft Local Plan, despite these declarations, fails adequately to deal with aspects as diverse as run-off from agriculture (Strategic Policy 35 is not robust enough), levels of air and water pollution (Policy 82 deals with new development, not tackling current issues), change of land-use from agricultural to 'development' (very little on this key issue within the draft Local Plan), a new town (Strategic Policy 8 has no reference to 'greening' the development) and the in-migration of an older demographic (actively stimulated by Policy 41).

**The SVBG would therefore urge the draft Local Plan to radically include many more specific measures to deal with the threats to the District's biodiversity.**

The SVBG would also welcome the draft Local Plan's recognition of Biodiversity value and importance at point 13.4 – that “the policies of this new local plan seek to protect existing features of biodiversity value, increase protection of biodiversity features, enhance and expand existing features of biodiversity value, improve the quality and accuracy of ecological information submitted for assessment, and improve avoidance, mitigation and compensation outcomes resulting from permissions.”

Finally, the SVBG would argue that in order to carry out this declaration, again, the draft Local Plan will need to demonstrate considerably more ambition and detail – for example, that for the new town (Strategic Policy 8) or for the proposal at Woolbrook Road (Sidm\_01), there is very little consideration of how exactly these developments will achieve 'net-zero-carbon' or reach realistic levels of 'sustainability' and 'resilience' to the climate and biodiversity crises. Restrictions on car-use and an insistence on public transport links would take some of the pressure off our species and habitats. Many more 'nature-based' building technologies could replace 'hard-engineering' solutions which should not need 'mitigation'. There are so many such possibilities which the draft Local Plan should include.

**The SVBG would therefore urge that the draft Local Plan include many more specific proposals to enhance and expand the health of the natural world – many of which can readily be taken from [nature-based solutions](#), and from [green jobs](#) and the [circular economy](#).**



**Submitted by the Sid Valley Biodiversity Group  
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