

COMMENTS ON THE SOUTH DEVON CONSULTATION DRAFT MANAGEMENT PLAN 2019 - 2024

Note: our comments relate solely to the draft management plan (MP) policies, since these policies are relied on for plan-making and decision-taking in respect of all future development within and adjoining the South Devon AONB.

1. Landscape Character

Lan/P1 Character The replacement of the word 'seascape' by 'South Devon Heritage Coast' is supported, since this MP covers both the AONB and Heritage Coast.

Lan/P4 Tranquillity We suggest adding the following wording to make this policy less vague and more robust: *"Priorities include protection against anti-social and intrusive noise, nuisance from marine rivercraft, pheasant and game activities, shooting and engineering activity, helicopters and drones."* This would be entirely consistent with other MP policies which list priorities.

Lan/P5 Skylines & visual intrusion The word *"promoted"* in the second sentence is insufficiently robust (in planning terms) and ask that *the word "sought"* be reinstated.

2. Natural Resources & Climate

NatRes/P1 Natural capital As drafted, this policy is incomprehensible. Examples may help.

NatRes/P4 Climate change The additional wording *"working with physical processes where practicable"* is supported.

NatRes/P6 Energy We support the additional clarification.

3. Biodiversity and Geodiversity

BioGeo/P1 Designated sites Please reinstate the words *"protected from damage"* for clarity and to make the policy more robust.

BioGeo/P2 Priority species The definition of *"priority species"* [as at the time of publication] needs to be reinstated for clarity.

BioGeo/P3 Ecological networks Again, the terms *"natural capital approach"* and *"at a landscape scale"* need explaining if this policy is 'to have teeth' particularly for the purposes of development control.

BioGeo/P4 Geodiversity Please include examples, such as, preservation of dunes.

BioGeo/P5 Reconnecting people and wildlife We suggest adding the following words at the end of the sentence: “... to help conserve and manage the South Devon AONB.”

BioGeo/P6 Positive cumulative impacts We suggest inserting the words “positive and constructive” before “management” and reinstating the types of land (for clarity). Query whether “the air” should be included?

BioGeo/P7 Damage and disturbance Please include examples, such as, the dune ecosystem, which is an integral part of the beach environment.

BioGeo/P8 Invasive non-native species. What is meant by taking a “Strategic approach to the control” of invasive non-native species? This policy needs to be more robust. Some examples would help. Whilst pheasants are not an invasive species, the introduction of a commercial pheasant shoot along the Avon Estuary has raised concerns in our parish about the possible impact of pheasant rearing on the ecosystem and biodiversity.

4. Historic Environment

Hist/P2 A heritage asset There needs to be some explanation as to why the South Devon AONB landscape should be regarded as a single unified heritage asset of national importance. The description in the current MP assists with this.

Hist/P7 Coastal heritage The words “historic significance” need to be reinstated to be consistent with the NPPF (para 184) and the planning regime.

Hist/P8 Land management Again, pity to lose the examples which provide clarification.

5. Farming & Land Management

LanMan/P2 Farming with nature Deletion of the reference to “High Nature Value farmland and woodland” is supported so that the policy can be more widely applied.

LanMan/P4 Environmental land management Examples are helpful, otherwise, the policy becomes rather vague. Please consider reinserting and adding that good game estate management will also be promoted.

LanMan/P5 Communities, farming and our environment We suggest inserting the words “will be promoted to” before “enable a deeper understanding” etc, since this is a policy, not a statement.

LanMan/P8 & P9 Land management support These 2 policies (which have the same heading) could be combined, as follows: “Support and assistance will be offered to land managers to deliver environmental outcomes developed through collaboration and consultation, creating local priorities consistent with key national policy

objectives. This will include supporting farmers and landowners to deliver locally focused environmental outcomes from agri-environment payment schemes.”

6. Coast & Marine Environment

Mar/P1 Coastal character We suggest ending the second sentence with “... *whilst still protecting its undeveloped character.*”

Mar/P6 Protective public ownership What is meant by “*protective public ownership*”? Is there any scope for local authorities to acquire undeveloped coastline?

7. Rivers & Estuaries

Est/P2 Maritime services The location for maritime services is too restrictive and needs to be extended to “*within and close to harbour areas, estuaries and rivers*” to assist the local economy and provide jobs, if the AONB is to be “*a thriving and dynamic work place*” (the AONB Vision). Traditional maritime services are to be encouraged.

Est/P5 Coordination and management It would be helpful if the term “*Catchment Based Approach*” could be clarified.

Est/P8 Environmental management We note this is a new policy but it is incomprehensible. We suggest the following: “*All foreshore, seabed and tidal waters developments need to protect and conserve the health of foreshore, seabed and open water habitats. This will be achieved by advising and working with developers and relevant authorities.*”

8. Access, Recreation & Tourism

Acc/P5 Access to beaches and coastal corridor Examples would be helpful to clarify what “*coastal margin projects*” are.

Acc/P6 Popular sites Please consider reinstating the word “*provided*” (or ‘supported’) which is more robust than “*promoted*”.

Acc/P7 Developer contributions As drafted, this policy reads as if developers are being encouraged to provide additional recreational facilities on site, when in fact any such facilities would be subject to the usual planning process, taking into account any impact on the AONB.

Acc/P9 Tourism This policy needs to be qualified by adding the following words at the end of the last sentence: “... *provided there is no impact on the landscape character (including tranquillity, skylines and visual intrusion, and seascape) of the South Devon AONB.*”

9. Planning & Sustainable Development

Plan/P2 Decision-taking The term “*mitigation hierarchy*” has been added but not explained. We suggest: “.....*seeking to avoid, minimise or as a last resort compensate, for harm to the special qualities and distinctive characteristics of the AONB.*”

10. Transport & Highways

Trans/P1 Highway management The words “improvement (including lighting, signage and verge management)” have been removed and need to be reinstated for clarity. The words “*will be supported*” at the end of the sentence need to be deleted.

Trans/P3 Parking We suggest: “*Pressures from increased vehicle usage*” instead of “*Car-borne pressures*” to include other types of vehicles that use car parks.

Trans/P4 Green Lanes We suggest the word “*legal*” in this context needs to be replaced by “*lawful*”.

Trans/P6 Public transport It would be useful to retain the original examples for clarity.

11: Rural Economy & Services

Econ/P1 Green economy

It would be helpful to have examples of such employment sectors.

12. Community & Culture

Comm/P3 Resilience We suggest the following alternative wording: “*The provision and use of community facilities (such as, local shops, open space and places of worship and other local services) to enhance the sustainability and resilience of communities will be supported.*” This would be consistent with NPPF 2018 (para 92).

13. Awareness & Communication No comments.

14. Management, Organisation & Partnerships

Part/P7 AONB boundary It is not clear how the AONB Partnership will keep the AONB boundary under review. There is support in our parish, for example, for Burgh Island to be included within the AONB boundary, since any development on Burgh Island affects a whole stretch of coastline within the AONB, where MP policies Lan/P5 and Lan/P6 are paramount.

*Thurlestone Parish Council
4 November 2018*