

**Devon Countryside Access Forum**  
**CORRESPONDENCE RECEIVED**  
(not specifically on agenda)  
Available to view on request

	<b>Sender</b>	<b>Subject</b>	<b>Action and any feedback</b>
1	Strategic Planning SW Devon January 2020	Plymouth & South West Devon Supplementary Planning Document	<p>Discussed with Chair and sent short response.</p> <p>The Devon Countryside Access Forum advises that changes should be made to policy Dev 3.3. – Public Rights of Way and Bridleways.</p> <p>Bridleways are a category of public rights of way and not a separate type of route. However, the DCAF appreciates the specific needs of horse riders and it is worth highlighting this.</p> <p>The DCAF advises that Dev 3.3 and the wording in 3.94 should be amended along these lines (proposed additions in italics).</p> <p>Dev 3.3 Public Rights of Way <i>(footpaths and bridleways) and recreational trails.</i></p> <p>3.94 “There are opportunities to improve connectivity, particularly linking new development sites to existing recreational areas, green spaces, Public Rights of Way <i>and recreational trails.</i> Opportunities to increase, or improve, Public Rights of Way (PROW) alongside new development, will be actively pursued. <i>Early negotiations will need to take place with landowners to investigate the potential and discuss relevant land management needs and rights.</i></p> <p>The DCAF has also prepared a Position Statement on Green Space and the Forum advises that</p>

			<p>the matters in this statement should be incorporated in the SPD, especially highlighted points which have not been fully addressed.</p> <p>The Position Statement refers to Natural England's Green Infrastructure standards. Natural England has recently published a revised draft framework, and this is attached.</p> <p><b>See outcome in Correspondence Log number 21.</b></p>
2	Marine Management Organisation January 2020	South West Inshore and South West Offshore Marine Plan	No action. The DCAF commented on previous iterations.
3	East Devon District Council 14.01.20	East Devon Affordable Housing SPD consultation	Outside remit. No response.
4	Dalwood Neighbourhood Plan Steering Group 18.01.20	Regulation 14. Pre-submission consultation.	Discussed with Chair. Neighbourhood Plan position statement submitted. A couple of comments were made advising that the use of colours on the public rights of way map obscured one of the footpaths. It was also not clear whether any recreational trails or the NCN went through the parish as these were on the key.
5	Devon County Council January 2020	Transport improvements in Starcross and Mamhead Road.	<p>The Forum Officer was alerted to this DCC consultation by the BHS Access Officer for Devon on 15/01/20.</p> <p>Discussed with Chair and local DCAF member and submitted brief response, below, based on previous advice on vulnerable road users.</p> <p>Proposals for Mamhead Road to increase widths and visibility are likely to increase traffic speed and vehicle size on what is essentially a rural road and could make it more dangerous for vulnerable road users.</p>

			<p>The DCAF advises, in line with previous advice it has provided, that consideration should be given to the safety of vulnerable road users; walkers, horse riders and cyclists. Horse riders and walkers currently access Powderham Estate to the east, and substantial areas of Forestry Commission land along the Mamhead Road, for example at Kenton Hill. These link to further walking, riding and cycling areas at Haldon Forest Park. The Mamhead Road also leads to the Exe Estuary trail.</p> <p>One footpath of particular concern, (Kenton FP2), finishes at the Black Forest Lodge cross-roads and there is the option to walk into the Forest on the other side of the road. This is a difficult junction with poor visibility and a steep gradient and any traffic speed increases could have safety implications for horse riders and walkers. A nearby footpath, (Starcross FP 9), links the Kenton road to the Black Forest but again involves crossing the Mamhead Road. There are, in addition, a couple of bridleways in the area accessed from minor roads leading off the Mamhead Road.</p> <p>The Forum requests that the safety audit for this road scheme considers on-road use by non-motorised users, and where walkers and horse riders might be crossing the road, in order to determine whether any mitigation is required.</p>
6	Open Access Centre 05.02.20	Case number 2019088949  Notification of a discretionary restriction under Section 22	Information only. No action required.

		<p>of the Countryside and Rights of Way Act 2000.</p> <p>The restriction applies to land at Hartridge Hense Moor and Luppitt Common for the following dates in 2020:</p> <p>11 February and 17 March</p> <p>8 of the 28 days allocated to this case have now been used.</p>	
7	<p>South Hams District Council and Plymouth City Council; 07.02.20</p>	<p>Local Green Space Development Plan Document. Designation Criteria for the Plymouth Policy Area.</p> <p>Views sought on the proposed methodology and the criteria the Councils will use to assess whether or not green spaces within the Plymouth Policy Area (as defined by the Joint Local Plan) should be formally designated as 'Local Green Spaces'</p>	<p>Discussed with Chair. Nothing specific the DCAF can add to the proposed methodology.</p>
8	<p>East Devon District Council 17.02.20</p>	<p>Public Consultation - Extension and Minor Variations of East Devon DC Public Spaces Protection Orders. Anti-Social Behaviour Crime and Policing Act 2014</p> <p>Proposal to extend for three years.</p>	<p>No action required. The Control of Dogs Order (made 2 May 2017) –</p> <p>(i) No changes proposed to general and district wide controls.</p> <p>(ii) Specified changes have been requested by town and parish councils and almost all refer to new children's play areas that require a dog exclusion in line with other play areas across the district, or minor amendments to descriptions or map.</p>
9	<p>Mid Devon District Council 21.02.20</p>	<p>Mid Devon District Council consultation event. It relates to the Adopted Masterplan SPD of the Tiverton Eastern Urban Extension (EUE). Removal of three housing clusters.</p>	<p>Outside DCAF remit.</p>

10	North Devon District Council 13.03.20	2020 Public Spaces Protection Orders	Subject areas not within DCAF remit: intoxicating substances; public urination; anti-social behaviour and aggressive begging. (Sometimes PSPO cover dog control issues which are relevant to recreational access)
11	Torrige District Council 19.03.20	Winkleigh Neighbourhood Plan. Consultation in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).	Discussed with Chair. Plan incorporates relevant policy and reference to the DCAF position statement, as below. No further comment made. <b>Policy CL2: Access to the countryside for leisure</b> Existing public rights of way will be protected and enhanced. Subject to the impact on adjacent land users and the environment, proposals to extend and link public rights of way and create new routes (particularly where they link to well used areas such as the Winkleigh Sports Centre and playing fields/playground and Winkleigh Woods) will be supported. Developers should have regard to the Devon Countryside Access Forum Position Statement on Greenspace
12	North Devon Biosphere 23.03.20	Draft North Devon Marine Natural Capital Plan.  The North Devon Marine Natural Capital Plan has been commissioned under the auspices of the North Devon Biosphere UNESCO Biosphere Reserve and the North Devon Marine Pioneer to pilot a Natural Capital Approach to management of the marine environment as a Pioneer project in the UK Government 25 Year Environmental Plan (YEP)	Peripheral to remit as focus on the marine environment.
13	Mid Devon District Council March 2020	Cullompton Town Centre Masterplan & Delivery Plan.	Discussed with Chair and sent Green Space position statement and Local Development

			Framework and Planning Statement. Opportunity to comment on detail at a later stage.
14	Teignbridge District Council 25.03.20	Draft Teignbridge Local Plan (Part 1) 2020-2040: Quality as Standard.	<p>Discussed with Chair and sent agreed position statements on Greenspace and Disability Access to inform the Local Plan.</p> <p><b>Sustainable Communities Policy SC5: Infrastructure</b></p> <p>The Devon Countryside Access Forum notes point e) – “whilst recognising potential for development viability considerations, ensure that new development is provided with appropriate infrastructure as early in the development as possible. Connections to existing footpaths and cycleways should be delivered prior to occupation;” The Forum strongly supports this point but advises that the wording should be amended as these connections should include bridleways and restricted byways as well as footpaths. The phrase could be altered to “connections to existing public rights of way (footpaths, bridleways and restricted byways) and trails should be delivered prior to occupation.”</p> <p><b>Design and Wellbeing Policy DW17 – Long-Term Stewardship</b></p> <p>The Devon Countryside Access Forum particularly welcomes the policy on DW17 – Long-Term Stewardship as it has been concerned about the development of green spaces without adequate long-term funding in place for maintenance. This is required to ensure such spaces are well-maintained and continue to be places people enjoy accessing.</p>

			For clarity, it would be helpful if DW17 made it clear that this policy did not apply to agricultural development.
15	Mid Devon District Council 11.05.20	Consultation on Design Guide - Supplementary Planning Document (SPD)	Outside remit
16	East Devon District Council 13.05.20	<p>Membury Neighbourhood Plan was formally 'made' by East Devon District Council on 27 April 2020.</p> <p>The Neighbourhood Plan now forms part of the Local Development Plan and will be taken into account in determining planning applications.</p> <p>The <u>Adopted Version of the Plan</u> is available to view on the East Devon District Council website.</p>	No action required.
17	East Devon District Council May 2020	Newton Poppleford and Harpford Neighbourhood Plan. Regulation 16 consultation.	<p>Discussed with Chair and Vice Chair and sent position statements on Neighbourhood Plans and Disability Access. Additional comments were made:</p> <p>The Forum welcomes the ambition to develop a future footpath and cycling strategy for the parish. In accordance with advice the Forum has previously given it would support improvements for multi-use (walkers, cyclists and horse-riders), wherever possible, which should also take into account the needs of disabled users.</p> <p>Consultation with landowners and land managers is strongly recommended at an early stage of planning and discussion and the Forum advises inclusion of this in the Plan.</p> <p>In terms of clarity, the wording for policy T3 – Public Rights of Way</p>

			<p>would be better expressed as “The improvement and enhancement of existing public rights of way (footpaths and bridleways), the National Cycle Network and pavements will be supported.”</p> <p>The map on page 68 is not particularly comprehensible as the colours are insufficiently distinct. It is also unclear what is meant by “private footways” and “private”. Are these permissive routes? In which case, this would be a better term. Otherwise a footnote of explanation would be helpful, for example if they are unadopted highways.</p>
18	Mid Devon District Council 03.06.20	Mid Devon District Council Community Infrastructure Levy consultation.	<p>The Devon Countryside Access Forum submitted a representation to the previous Community Infrastructure Levy (CIL) consultation in 2015.</p> <p>The Inspector will be examining the 2017 Draft but Mid Devon District Council have asked the Inspector to also consider representations made to the 2015 Draft consultation.</p> <p>Discussed with Chair and confirmed that the DCAF representation sent in 2015 should be progressed.</p>
19	Kingston Neighbourhood Plan Team 17.07.20	Regulation 16 consultation on Kingston Neighbourhood Plan feedback.	<p>Position statement and request to include public rights of way previously sent in September 2019.</p> <p>Small policy amendment to KNP 7 now includes a reference to footpaths.</p> <p><b>Policy KNP7: Protecting the Landscape and Biodiversity.</b> Development, either individually or cumulatively, shall not harm but should conserve and enhance the landscape and biodiversity by:</p>



			safeguarding and conserving local features that make a positive contribution to the landscape, particularly Devon lanes, footpaths and hedgebanks, green lanes, green spaces and important trees;
20	Department for Transport. July 2020	Transport Decarbonisation Plan. Request for information and evidence.	Discussed with Chair and Vice Chair and sent draft advisory note on trails plus the position statements on Planning and Neighbourhood Plans.
21	Joint Local Plan Team 28.07.20 (Plymouth, South Hams and West Devon)	<p>The Plymouth and South West Devon Supplementary Document (SPD) is now adopted across the three Joint Local Plan authorities.</p> <p>All the documents, including a Consultation Response Report are available online: <a href="https://www.plymouth.gov.uk/planningandbuildingcontrol/supplementaryplanningdocuments/adoptedsupplementaryplanningdocument">https://www.plymouth.gov.uk/planningandbuildingcontrol/supplementaryplanningdocuments/adoptedsupplementaryplanningdocument</a></p> <p>The Joint Local Plan authorities have also adopted the new Statement of Community Involvement (SCI).</p>	<p>For information only. (See number 1 in the Correspondence Log). The policy on public rights of way has been amended to reflect some but not all the comments made in the DCAF's submission to the consultation in January 2020. Reference is now made to recreational trails and landowners.</p> <p>DEV3.3–Public rights of way and bridleways 3.110 There are opportunities to work creatively with landowners to improve connectivity, particularly linking new development sites to existing recreational areas, greenspaces, Public Rights of Way and other recreational trails. Opportunities to increase, or improve, Public Rights of Way (PROW) alongside new development, will be actively pursued.</p>
22	Mid Devon District Council 13.08.20	<p>Mid Devon Local Plan Review 2013 – 2033 / Adoption Statement</p> <p>The Council adopted the Mid Devon Local Plan Review 2013 – 2033 on the 29 July 2020.</p> <p>Mid Devon District Council is updating the Written Statement and Policies Map for the Local Plan to reflect all modifications made and</p>	

		<p>corrections needed and will publish these, together with its adoption statement and Sustainability Appraisal.</p> <p>The Mid Devon Local Plan Review 2013 – 2033 now carries full weight in the consideration of planning applications and replaces the Mid Devon Core Strategy (July 2007), Local Plan Part 2 (Allocations and Infrastructure DPD)(October 2010) and Local Plan Part 3 (Development Management Policies) (November 2013).</p>	
23	<p>East Devon District Council 11.08.20</p>	<p>Farringdon Neighbour Plan</p> <p>Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.</p>	<p>Consulted with Chair and sent Neighbourhood Plan position statement. Advised on small amendment to the walking and cycling policy (Farr 12) to include public rights of way. E.g. Development proposals to improve accessibility and extend local footpaths, bridleways and cycle-paths and strengthen links with the wider transport <i>and public rights of way networks</i> will be supported.</p>
24	<p>Bovey Tracey Neighbourhood Plan Steering Group August 2020</p>	<p>Pre-submission version of the Bovey Tracey Neighbourhood Plan.</p>	<p>Consulted with Chair and sent Neighbourhood Plan position statement.</p>
25	<p>Open Access Centre 27.08.20</p>	<p>Notification of a discretionary restriction under Section 22 of the Countryside and Rights of Way Act 2000.</p> <p>The restriction applies to land at Hartridge Hense Moor and Luppitt Common for 22 September 2020.</p> <p>9 of the 28 days allocated to this case have now been used. The details of this restriction appear on the Open Access website</p>	<p>For information. No action required.</p>

26	Open Access Centre 09.09.20	<p>Notification of a discretionary restriction under Section 22 of the Countryside and Rights of Way Act 2000.</p> <p>The restriction applies to land at Hartridge Hense Moor and Luppitt Common for the following dates: -</p> <p>1, 8, 15, 22 and 29 October 5, 12, 19 and 26 November 3, 10, 17, 24 and 31 December</p> <p>23 of the 28 days allocated to this case have now been used. The details of this restriction appear on the Open Access website.</p>	
27	Open Access Centre 09.09.20	<p>Notification of a discretionary restriction under Section 22 of the Countryside and Rights of Way Act 2000.</p> <p>The restriction applies to land at Hartridge Hense Moor and Luppitt Common for the following dates next year: -</p> <p>7, 14, 21 and 28 January 2021 1 February 2021.</p> <p>5 of the 28 days allocated to this case have now been used.</p>	

*In addition, the DCAF Forum Officer receives a large quantity of e-mail updates from Devon County Council and other organisations. Relevant information is extracted and circulated to DCAF members via regular newsletters or forwarded direct.*