

# Public Document Pack

Mid Devon District Council

Cabinet

Thursday, 30 May 2019 at 2.15 pm  
Exe Room, Phoenix House, Tiverton

Next ordinary meeting  
Thursday, 27 June 2019 at 2.15 pm

Those attending are advised that this meeting will be recorded

## Membership

To be confirmed

## A G E N D A

*Members are reminded of the need to make declarations of interest prior to any discussion which may take place*

- 1. Public Question Time**  
To receive any questions relating to items on the Agenda from members of the public and replies thereto.
- 2. Declarations of Interest under the Code of Conduct**  
Councillors are reminded of the requirement to declare any interest, including the type of interest, and reason for that interest, either at this stage of the meeting or as soon as they become aware of that interest.
- 3. Minutes of the Previous Meeting (Pages 5 - 12)**  
Members to consider whether to approve the minutes as a correct record of the meeting held on 4 April 2019.
- 4. Blackdown Hills - Area of Outstanding Natural Beauty (AONB) Management Plan (Pages 13 - 86)**  
To consider a report of the Head of Planning Economy and Regeneration outlining the final draft of the Blackdown Hills Area of Outstanding Natural Beauty (AONB) Management Plan 2019-2024 following a period of formal consultation.
- 5. Cullompton East and Culm Garden Village (Pages 87 - 130)**  
To consider a report of the Head of Planning Economy and Regeneration requesting the Cabinet to note the outcomes of the recent stage 1 public consultation on two documents: 1) a Vision & Concept for the Culm Garden Village; and 2) an East Cullompton Masterplan SPD Issues, Opportunities & Concepts in respect of Phase 1 of the Culm Garden Village.

6. **Housing Infrastructure Fund** (Pages 131 - 142)  
To consider a report of the Head of Planning Economy and Regeneration updating Members on the progress of discussions with Homes England over the Council's two applications for funding under the Housing Infrastructure Fund (HIF) totalling £18.2 million, and seeking authority to enter into grant funding agreements with Homes England over these funds and to seek authority for the Council to forward fund the two infrastructure projects in question.
7. **Tiverton Eastern Urban Extension Area B Masterplanning** (Pages 143 - 150)  
To consider a report of the Head of Planning, Economy and Regeneration advising Members on the results for the procurement of a masterplan for the development of Area B, Tiverton Eastern Urban Extension.
8. **Nomination of Director for 3 Rivers Developments Limited**  
In March 2017, the Cabinet gave delegated authority to the Cabinet Member for Housing, the Director of Finance and the Head of Housing and Property to establish a housing development company, based on the skill-set and experience the three individuals in those roles at that time could offer. The company, 3 Rivers Developments Limited, was established in April 2017 and those with delegated authority became the three Council directors. That reflected the intentions set out in the report, although it was recognised that this would be the initial arrangement. The Board of the Company has the power to appoint two further non-executive directors independently.
- Cllr Stanley (in his capacity as the then Cabinet Member for Housing) is currently a nominated director. If the Cabinet wishes to change this, it must nominate someone else and the Board will make the necessary arrangements to give effect to the appointment. However, it is essential that the person who takes on the role has the time and skill-set to meet the statutory duties which apply to company directors generally and to the specific needs of 3 Rivers. Training will be provided on these duties, but directors must recognise that when they are acting as such, their primary duty is to the company and its success – and remembering the purpose for which the company was first established i.e. to make a financial return to the Council.
9. **Cabinet Member Decisions**  
Cabinet are asked to note the following decisions made by the Cabinet Member for Housing:
- a) To grant a lease of Orchard Way Play Area, Willand to Willand Parish Council for a term of 25 years at a peppercorn rent.

REASON FOR DECISION:

Mid Devon District Council have completed a rationale of all play areas across the District and following consultation, Willand Parish Council have resolved to be financially responsible for the asset.

A s.123 Local Government Act 1972 (disposal of open space) notice was published in the local press for two consecutive weeks on 26<sup>th</sup> March 2019 and 2<sup>nd</sup> April 2019.

If the disposal were to be regarded in any way as at an undervalue, it would be approved in accordance with the General Disposal Consent Order 2003, because the play area/open space land will be preserved long term which is in the interests of the social well-being of Willand.

- b) To terminate the lease of Puddington Play Area, where MDDC is the tenant.

REASON FOR DECISION:

Mid Devon District Council have completed a rationale of all play areas across the District and following consultation, Puddington Parish Council have resolved to be financially responsible for the play area/open space land.

It has been agreed with the current owner of the land that the play area/open space land will be transferred to Puddington Parish Council upon termination of the lease by Mid Devon District Council, thus ensuring it will remain open to the public.

- 10. **Notification of Key Decisions** (*Pages 151 - 162*)  
To note the contents of the Forward Plan.

**Stephen Walford**  
Chief Executive  
Wednesday, 22 May 2019

Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so, as directed by the Chairman. Any filming must be done as unobtrusively as possible from a single fixed position without the use of any additional lighting; focusing only on those actively participating in the meeting and having regard also to the wishes of any member of the public present who may not wish to be filmed. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairman or the Member Services Officer in attendance so that all those present may be made aware that is happening.

Members of the public may also use other forms of social media to report on proceedings at this meeting.

Members of the public are welcome to attend the meeting and listen to discussion. Lift access the first floor of the building is available from the main ground floor entrance. Toilet facilities, with wheelchair access, are also available. There is time set aside at the beginning of the meeting to allow the public to ask questions.

An induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, or

If you would like a copy of the Agenda in another format (for example in large print) please contact Sally Gabriel on:

Tel: 01884 234229

E-Mail: [sgabriel@middevon.gov.uk](mailto:sgabriel@middevon.gov.uk)

Public Wi-Fi is available in all meeting rooms.

## MID DEVON DISTRICT COUNCIL

**MINUTES** of a **MEETING** of the **CABINET** held on 4 April 2019 at 2.15 pm

**Present**

**Councillors** C J Eginton (Leader)  
R J Chesterton, P H D Hare-Scott,  
C R Slade and R L Stanley

**Apologies**

**Councillor(s)** Mrs M E Squires

**Also Present**

**Councillor(s)** F W Letch and F J Rosamond

**Also Present**

**Officer(s):** Stephen Walford (Chief Executive), Andrew Jarrett (Deputy Chief Executive (S151)), Kathryn Tebbey (Group Manager for Legal Services and Monitoring Officer), Jane Lewis (Communications and Engagement Manager), Adrian Welsh (Group Manager for Growth, Economy and Delivery), Catherine Yandle (Group Manager for Performance, Governance and Data Security), John Bodley-Scott (Economic Development Team Leader) and Sally Gabriel (Member Services Manager)

**173. APOLOGIES**

Apologies were received from Cllr Mrs M E Squires.

**174. PUBLIC QUESTION TIME**

There were no members of the public present.

**175. DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (00-00-56)**

The following interests were declared:

<b>Councillor</b>	<b>Interest</b>	<b>Reason</b>
C R Slade	Personal	Item 8, as Chairman of the Grand Western canal Joint Advisory Committee
C R Slade	Personal	Item 8, as he had been a Member of the Devon and Exeter Rail Project
C R Slade	Personal	Item 15, as Ward Member who attends meetings of the Moorhayes Community

**176. MINUTES OF THE PREVIOUS MEETING (00-01-36)**

The minutes of the previous meeting were approved as a correct record and signed by the Chairman.

**177. ELECTRIC CAR CHARGING POINTS (00-02-25)**

Arising from a \*report of the Group Manager for Corporate Property and Commercial Assets, the Environment Policy Development Group had recommended that the Council considers the provision of home electric car charging points in all new developments across the district for all new properties.

The Cabinet Member for Housing outlined the contents of the report stating that the report detailed the background in terms of Central Government Policy and incentives for Ultra Low Emission Vehicles (ULEVs) and the types of ULEVs available and targets to 2040. He added that the majority of ULEV car owners recharge their vehicles at their homes overnight and do not make use of public recharging points. Research showed that most of the journeys taken were for short distances within the range of a single charge for the vehicle. There were currently 3 main charging options available and the Council had a rapid charging system at the 3 leisure centres in Mid Devon; site performance statistics were available in the report.

**RESOLVED** that the recommendation of the PDG be acknowledged and that the Head of Planning, Economy and Regeneration be requested to produce a report outlining how the provision of home electric car charging points in all new developments across the district for all new properties may be achieved through the planning policy process.

(Proposed by Cllr R L Stanley and seconded by Cllr R J Chesterton)

Note: \*Report previously circulated, copy attached to minutes.

**178. PRIVATE SECTOR HOUSING FEES AND CHARGES 2019/20**

Arising from a report of the Group Manager for Public Health and Regulatory Services, the Homes Policy Development Group had made the following recommendations:

- a) The revised fees and charges as set out in Annex 1 be approved.
- b) That Public Health and Regulatory Services be authorised to enforce The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 as amended 2016.
- c) That a charge is made for providing copies of the Mandatory HMO Licensing Public Register when requested.

The Cabinet Member for Housing outlined the contents of the report stating that Private Sector Housing had a duty to ensure that private accommodation met minimum standards. In particular there were regulations for the licensing, management and use of houses in multiple occupation (HMO), carbon monoxide detectors and smoke alarms, and hazards within the home. All enforcement activities and relevant fees and charges within the report were set out in compliance with the legislation and the Public Health Services Enforcement Policy adopted in August 2016 and the draft Operations Directorate Enforcement Policy 2019. He explained the changes to the fees and charges outlined in annex 1 of the report and the penalties for Housing Act offences.

Consideration was given to how offences would be enforced.

**RESOLVED** that the recommendations of the Policy Development Group be approved.

(Proposed by Cllr R L Stanley and seconded by Cllr C R Slade)

Note: \*Report previously circulated, copy attached to minutes.

#### 179. **HOUSING ASSISTANCE POLICY, DEVON WIDE (00-13-03)**

Arising from a report of the Group Manager for Public Health and Regulatory Services, the Homes Policy Development Group had recommended that:

- a) The revised Housing Assistance Policy 2019-22 attached in Annex 1 be approved.
- b) The ECO Flex Statement of Intent (SOI) attached in Annex 4 associated with the revised Housing Assistance Policy be approved.
- c) Delegated authority be given to the Group Manager for Public Health and Regulatory Services in consultation with the Cabinet Member for Housing to make minor adjustments to the policy based on demand and local priorities.
- d) Delegated authority be given to the Group Manager for Public Health and Regulatory Services in consultation with the Cabinet Member for Housing to suspend some or all non-mandatory parts of the revised Housing Assistance Policy attached in Annex 1 (all elements of the Policy other than section 4.1 Disabled Facilities Grants) if adequate funding is not available.

The Cabinet Member for Housing outlined the contents of the report stating that the Better Care Fund intentionally provided more funding to Devon than was currently required to meet the demand for mandatory Disabled Facility Grants only. A wider policy was required to allow the Devon councils to spend the Better Care Fund on assistance that helped a wider range of households and met the broader Better Care Fund objectives.

The policy agreed in February 2018 substantially updated and replaced the previous Mid Devon Private Sector Housing Renewal Policy adopted in 2012. The Policy presented had been updated based on the experience of delivering the new policy over the past year.

In addition there had been changes to the ECO flex fund and therefore this needed to be reflected in the statement of intent (SOI). The SOI was a mandatory requirement setting out the specific terms for accessing the funding locally. This would allow the Council to continue to provide assistance to local residents to improve the energy efficiency of their homes and reduce their fuel bills. He outlined the main scope of the policy and the assistance contained within the policy.

**RESOLVED** that the recommendations of the Policy Development Group be approved.

(Proposed by Cllr R L Stanley and seconded by Cllr P H D Hare Scott)

Note: \*Report previously circulated, copy attached to minutes.

#### 180. **GRAND WESTERN CANAL & EXE RAIL PARTNERSHIP (00-16-57)**

Arising from a report of the Group Manager for Growth, Economy and Delivery, the Economy Policy Development Group had made the following recommendations:

- a) That the contribution to the Devon & Exeter Rail Project be reviewed following formation of a new Rail Forum.
- b) That the Council continues to offer an annual grant of £45,000 for 2019/20 to the Grand Western Canal to support its maintenance.
- c) That an assessment be undertaken, in liaison with Devon County Council, prior to the financial year 2020/21 to inform decision making with regard to the level of future grant support for the Canal.

The Leader read an email from the Chairman of Holcombe Rogus Parish Council which highlighted the original funding arrangements and joint obligations for the Grand Western Canal.

The Cabinet Member for Planning and Economic Regeneration referring to the Devon and Exeter Rail Project stated that following changes to personnel, DCC had decided that it could no longer administer the group and it was decided to change the working group into a forum aligned to the Devon and Cornwall Rail Partnership with wider community involvement. The District Council had been contributing £3,500 annually to the Devon & Exeter Rail Project for a number of years, however, with the change of structure it seemed appropriate to review future funding arrangements.

With regard to the Grand Western Canal, he reported that the Council currently provided £45k as an annual grant towards the running of the canal which was well received by the County Council. He highlighted the breach incident in 2012 and the resolution of Council to offer a contribution towards the emergency works; however, the money had not been drawn down. With regard to the email from the Chairman of Holcombe Rogus Parish Council, at no stage had the County Council complained about the current level of funding and were happy to take part in the review

Consideration was given to the level of funding and the process for review.

**RESOLVED** that the recommendations of the Policy Development Group be approved.

(Proposed by Cllr R J Chesterton and seconded by Cllr C R Slade)

Notes:

- i) Cllr C R Slade declared a personal interest as Chairman of the Grand Western Canal Joint Advisory Committee and he had been a member of the Devon and Exeter Rail Project;
- ii) \*Report previously circulated, copy attached to minutes.

#### 181. **ENVIRONMENTAL HEALTH FEES AND CHARGES 2019/20 (00-24-14)**

Arising from a report of the Group Manager for Public Health and Regulatory Services, the Community Policy Development Group had made the following recommendations: to approve the Environmental Health Fees and Charges for 2019/2020 and that the missed appointment charge to be in line with the missed appointment charge within the extant Housing Policy used by the Building and Housing Services.

The Cabinet Member for Community Well-Being outlined the contents of the report stating that a review of fees and charges was necessary to offset or cover the costs incurred by the authority in carrying out its duties. He highlighted the current and proposed charges in respect of the environmental health functions along with the statutory and discretionary services provided and explained that a benchmarking exercise had taken place with other local authorities details of which were available at annex 2 of the report.

Consideration was given to the range of services and the proposed charges.

**RESOLVED** that the recommendation of the Policy Development Group be approved.

(Proposed by Cllr C R Slade and seconded by Cllr R L Stanley)

Note: \*Report previously circulated, copy attached to minutes.

#### 182. **OPERATIONS DIRECTORATE ENFORCEMENT POLICY (00-29-22)**

Arising from a report of the Group Manager for Public Health and Regulatory Services, a joint meeting of the Community, Environment and Homes Policy Development Groups had made the following recommendation: that Cabinet recommend to Full Council that the Operations Directorate Enforcement Policy be approved.

The Cabinet Member for Community Well-Being outlined the contents of the report stating the Operations Directorate was responsible for several different enforcement functions across a number of services and teams; that of Public Health and Regulatory Services, Housing Services and Street Scene. The policy was very much

a reference guide for officers and decision makers and the appendices to the report contained the details of how each area across the Directorate would comply with relevant information.

**RECOMMENDED** to Council that the recommendation of the Policy Development Groups be approved.

(Proposed by Cllr C R Slade and seconded by Cllr R J Chesterton)

Note: \*Report previously circulated, copy attached to minutes.

#### 183. **FINANCIAL MONITORING (00-31-20)**

The Cabinet Member for Finance provided a verbal report stating that the authority was £11k adrift of balancing the budget, this he felt was a tremendous achievement in a £40 million business. The improvement in the budget gap had been identified as repairs to a leisure centre being delayed and staff vacancies within Revenues and Benefits. He reported that the Housing Revenue Account was underspent and that rent arrears were better than last year despite the introduction of Universal Credit. There was no overspend on the Capital Programme but some slippage in the programme would occur.

#### 184. **PERFORMANCE AND RISK (00-33-05)**

The Cabinet had before it and **NOTED** a \* report of the Director of Corporate Affairs and Business Transformation providing Members with an update on the performance against the Corporate Plan and local service targets.

The Group Manager for Performance, Governance and Data Security outlined the contents of the report and took the Cabinet through each of the appendices.

Consideration was given to:

- The Homes Portfolio and Corporate Plan aim to build more council houses, the 4 units at Birchen Lane were complete, the 6 units at Burlescombe were almost complete and the handover of the 26 dwellings at Palmerston Park would take place on completion.
- The occupancy rate at Market Walk and empty units.

Note: \* Report previously circulated, copy attached to minutes.

#### 185. **NOTIFICATION OF KEY DECISIONS (00-39-07)**

The Cabinet had before it, and **NOTED**, its rolling plan \* for May 2019 containing future key decisions.

Note: \*Plan previously circulated, copy attached to minutes.

186. **ACCESS TO INFORMATION - EXCLUSION OF THE PRESS AND PUBLIC (00-39-27)**

Prior to considering the following item on the agenda, discussion took place as to whether it was necessary to pass the following resolution to exclude the press and public having reflected on Article 15 15.02(d) (a presumption in favour of openness) of the Constitution. The Cabinet decided that in all the circumstances of the case, the public interest in maintaining the exemption outweighed the public interest in disclosing the information.

It was therefore:

**RESOLVED** that under Section 100A(4) of the Local Government Act 1972 the public be excluded from the next item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 respectively of Part 1 of Schedule 12A of the Act, namely information relating to the financial or business affairs of any particular person (including the authority holding that information)

(Proposed by the Chairman)

187. **MOORHAYES COMMUNITY CENTRE, TIVERTON**

The Cabinet had before it a report \* of the Group Manager for Corporate Property and Commercial Assets outlining options for the disposal of an asset.

The Cabinet Member for Housing outlined the contents of the report and a full discussion took place.

Returning to open session the Cabinet:

**RESOLVED** that the recommendations outlined in the report be approved.

(Proposed by Cllr R L Stanley and seconded by Cllr C R Slade)

Notes

- i) Cllr C R Slade declared a personal interest as he attended meetings of the association as Ward Member;
- ii) \*Report previously circulated.

188. **RETIRING MEMBERS**

The Leader addressed the meeting taking the opportunity to thank Cllr P H D Hare Scott who was due to retire at the next election for his contribution and commitment to the Council over 12 years which included 6 years as Leader of the Council.

He also thanked Cllr F J Rosamond (current Chairman of the Scrutiny Committee) who was also retiring after 20 years service for his commitment and contribution to the work of the Council.

(The meeting ended at 3.15 pm)

**CHAIRMAN**

**CABINET**  
**30 MAY 2019**

## **REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION**

### **THE BLACKDOWN HILLS AREA OF OUTSTANDING NATURAL BEAUTY MANAGEMENT PLAN 2019 - 2024**

**Cabinet Member:** \*\*\*\*\*

**Responsible Officer:** Mrs Jenny Clifford, Head of Planning, Economy & Regeneration.

**Reason for Report:** To receive the final draft of the Blackdown Hills Area of Outstanding Natural Beauty (AONB) Management Plan 2019-2024 following a period of formal consultation.

#### **RECOMMENDATION:**

**That Cabinet recommend to Council that the Blackdown Hills AONB Management Plan 2019-2024 be adopted.**

**Relationship to Corporate Plan:** The AONB Management Plan is relevant to all 4 corporate priorities: economy, homes, community and environment and in particular to Aim 3 Environment - protecting the natural environment and Aim 3 Homes – planning and enhancing the built environment.

**Financial Implications:** The cost of reviewing the management plan is budgeted as part of the AONB service's core functions, for which Defra contribute 75% of the funding; the remaining 25% is provided between all the local authorities on the Partnership and these contributions are set out formally in a Memorandum of Understanding from 2016/17 -2019/20.

**Legal Implications:** There is a legal duty on all statutory authorities under the Countryside and Rights of Way Act 2000 (section 89) to ensure AONB Management Plans are prepared and reviewed periodically. There is a further statutory duty under section 85 on all 'relevant authorities' to have regard to the purpose of conserving and enhancing natural beauty when exercising or performing any function affecting land in AONBs.

**Risk Assessment:** There is a legal risk associated with not having an up-to-date management plan in place; and financial risk if Defra was to reduce or remove their contribution to AONB running costs as the risk would fall on the contributory statutory authorities.

**Equalities Assessment:** The AONB Management Plan is subject to its own Equality Impact Assessment.

## **1.0 BACKGROUND**

1.1 A review of the Blackdown Hills Area of Outstanding Natural Beauty Management Plan was considered by Cabinet on the 30<sup>th</sup> August 2018 at which time it was resolved to agree public consultation on the review of the management plan.

- 1.2 Under Part IV of the Countryside and Rights of Way (CROW) Act 2000, Mid Devon District, together with the other contributing local authorities, Devon and Somerset County Councils, East Devon and South Somerset District Councils and Taunton Deane Borough Council are required to produce a Management Plan for the Blackdown Hills AONB and subsequently review it at intervals of not more than five years. Accordingly, Mid Devon District Council, together with the other partner organisations authorised the Blackdown Hills AONB partnership to carry out a review on its behalf; co-ordinated by the AONB team.
- 1.3 The CROW Act 2000 and guidance from Natural England /Defra provides advice on the scale, nature and content of Management Plans: A Management Plan should serve to highlight a vision for the AONB and contain objectives, policies and targets for the delivery of the Plan. The Plan should be reviewed every five years. The delivery of the Plan is coordinated through the AONB Partnership and subject to availability of funding from Defra, the Local Authorities, and other parties.
- 1.4 The review of the Blackdown Hills AONB Management Plan followed former guidance to ensure a broadly consistent approach both nationally and locally. The partnership agreed that the reviews should be conducted with as light a touch as possible given the status of the UK's relationship with the EU and potential changes over the next five-year period, particularly in environmental policy and programmes, including the current Government review of National Parks and AONBs (the Glover review).

## **2.0 THE REVIEW**

- 2.1 The review process has been a participatory one, with members of the Partnership Management Group, local authority officers and other stakeholders involved in identifying key matters and considerations, in advance of a wider six-week public consultation on the revised draft (held October – November 2018).
- 2.2 The Plan was also screened under Strategic Environmental Assessment and Habitats Regulations Assessment regulations to ensure policies in the Plan meet these assessment requirements.
- 2.3 Following public consultation, the draft Plan has been revised and the final version of the Management Plan has undergone a formal consultation with the statutory consultee, Natural England before local authority adoption. It has been confirmed that the Management Plan meets the legislative requirements of the Countryside and Rights of Way Act 2000.

## **3.0 THE MANAGEMENT PLAN 2019-2024**

- 3.1 The draft plan attached at **Appendix 1** to this report sets out a vision for the Blackdown Hills AONB in 2029, which was first set out in 2009 to provide the long term goal for management of the AONB. The management plan also sets out the policy framework for the conservation and management of the Blackdown Hills AONB for the next five years. Its purpose is to:
- Highlight the special qualities and significance of the AONB
  - Present a vision for the future of the AONB
  - Set out objectives and policies to secure the vision

- Identify what needs to be done, and by whom
- State the condition of the AONB and how the effectiveness of its management will be monitored
- Reflect the views and aspirations of a wide range of AONB stakeholders and parties with an interest in it
- Co-ordinate the work of different partner organisations

3.2 The Blackdown Hills AONB Partnership recommends the attached AONB Management Plan for adoption by the Council as the statutory Management Plan for the Blackdown Hills Area of Outstanding Natural Beauty for the period 2019-2024. The plan has already been adopted by East Devon District Council and Devon County Council. It will be formally confirmed to Defra following local authority adoption.

**Contact for more Information:**

Mrs Jenny Clifford, Head of Planning, Economy and Regeneration  
01884 234346 [jclifford@middevon.gov.uk](mailto:jclifford@middevon.gov.uk)

**Background papers:** Blackdown Hills AONB Management Plan 2019-2024  
Cabinet 30<sup>th</sup> August 2018

**Circulation of the Report:**

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# **Blackdown Hills**

Area of Outstanding Natural Beauty

## **MANAGEMENT PLAN 2019 – 2024**

### **ADOPTION DRAFT**

**March 2019**



## Vision for the Blackdown Hills Area of Outstanding Natural Beauty

*In 2029:*

The Blackdown Hills remains an ancient landscape of small villages and farms, deep valleys and high hedges shaped by its unique geology.

Its sense of tranquil timelessness and lack of change provides reassurance in a polluted, overcrowded world and gives a sense of well-being to residents and visitors alike.

Its wildlife is thriving and heritage conserved due to sympathetic management that is keeping alive traditional skills. They are enjoyed and understood by local people and visitors alike.

Vibrant, diverse communities, with a strong sense of identity, live and work sustainably, supporting the local economy and conserving and enhancing the area's rich resources for future generations.

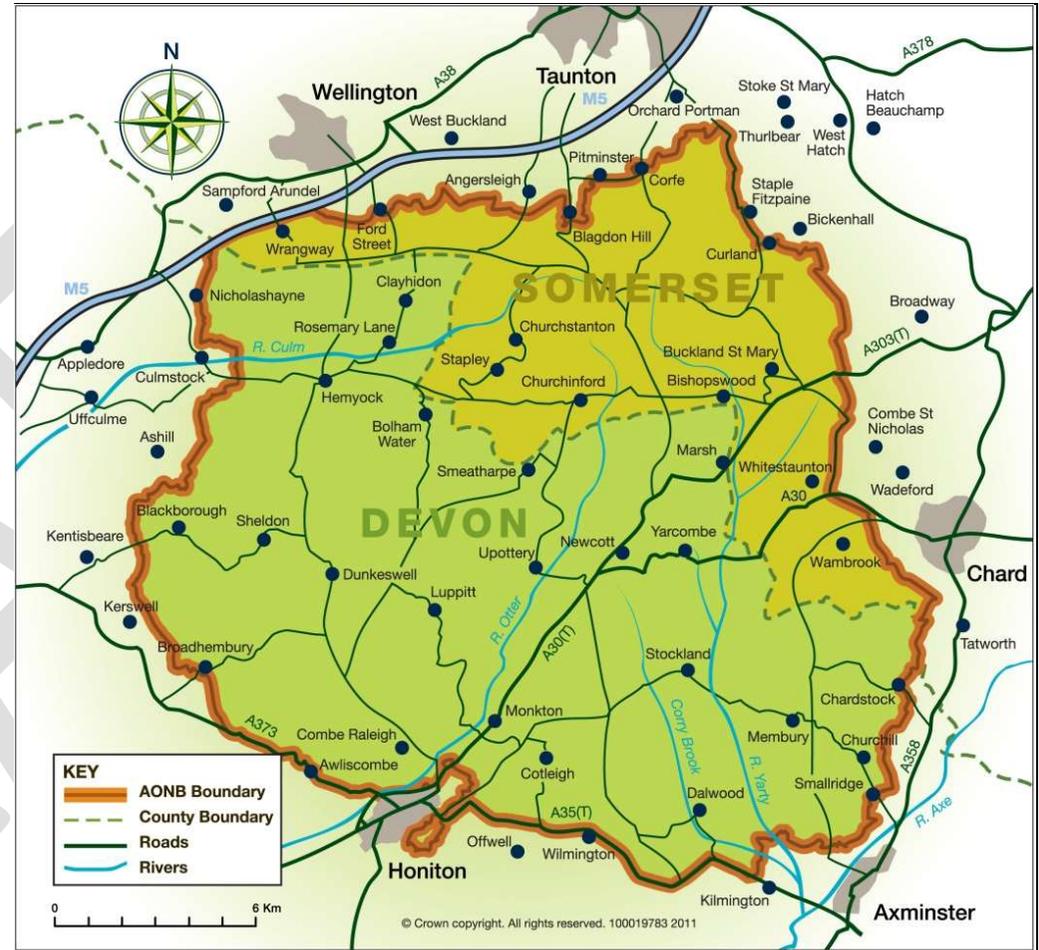
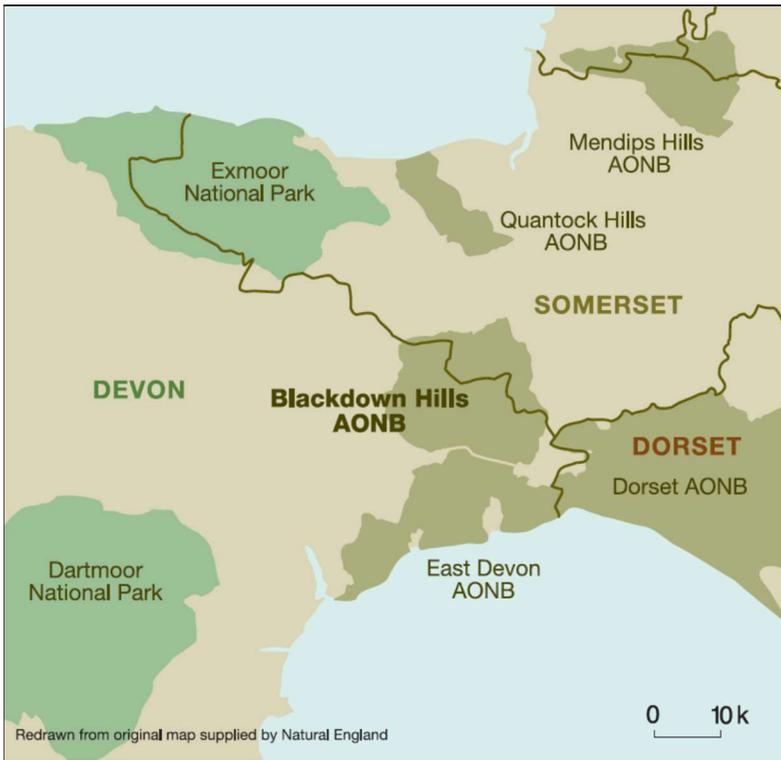
This Vision was first set in 2009, providing a long-term goal for management of the Blackdown Hills AONB.

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# CHAPTER 1

## LOCATION OF THE BLACKDOWN HILLS AREA OF OUTSTANDING NATURAL BEAUTY

The Blackdown Hills Area of Outstanding Natural Beauty (AONB) covers 370 square kilometres (143 square miles) of unspoilt countryside straddling the Somerset and Devon border, and embracing part of four separate district council areas.



## Ministerial Foreword

I am fortunate that England's Areas of Outstanding Natural Beauty are part of my Ministerial responsibilities. Whether it be rolling hills, sweeping coastline or a tranquil village, spending time in an AONB can stir the heart and lift the spirit.

This is a pivotal moment for all AONBs. The Government has set its ambition in the 25 Year Environment Plan which states clearly the importance of natural beauty as part of our green future, while AONBs retain the highest status of protection for landscape through national planning policy. Leaving the EU brings with it an opportunity to develop a better system for supporting our farmers and land managers, who play such a vital role as stewards of the landscape. And the Review of National Parks and Areas of Outstanding Natural Beauty led by Julian Glover - the first of its kind for generations - will make recommendations to make sure our designated landscapes can flourish in the years ahead.

In my visits to AONBs around the country, I have been struck by the passion of many people - farmers, volunteers, and hard-working staff - for the beautiful places they live and work in. In this spirit I am delighted to welcome publication of this Statutory Management Plan for the Blackdown Hills AONB. It is significant that this plan will be delivered in partnership by those who value the Blackdown Hills AONB. I would like to thank all those involved in the preparation of this document and wish you the best of success in bringing it to fruition.

*Lord Gardiner of Kimble - Parliamentary Under Secretary of State for Rural Affairs and Biosecurity*

## AONB Chairman's Foreword

The next five years offers considerable opportunity for the Blackdown Hills Area of Outstanding Natural Beauty (AONB) Partnership, as well as many challenges. Recent government policy reflects the value that high quality landscapes have to society and this strengthens our mandate to continue to work through our partnerships to conserve and enhance the nationally important and very special corner of England that is the Blackdown Hills.

We anticipate that the government's Review of Designated Landscapes will reflect the value to society that designated landscapes can deliver and we hope that future rural support mechanisms will enable our cherished landscape to be further enhanced and reward custodians, thereby mitigating against challenges such as climate change whilst optimising public goods and services.

We feel confident that this AONB Management Plan will provide the direction and focus to work collaboratively to make a difference to the Blackdown Hills and act to bring communities together to celebrate, understand and engage with the rich heritage that makes the area so distinctive and cherished.

I am proud to be chair of the AONB Partnership and I look forward to rewarding and inspiring times ahead, through the life of the AONB Management Plan period.

*Cllr Paul Diviani - Chairman, Blackdown Hills AONB Partnership*

### **AONB Partnership Commendation:**

This management plan is endorsed by partnership organisations as the guiding framework for maintaining the special character of the Blackdown Hills AONB, while recognising the need for a thriving future for the area and its communities.

## NATIONAL AND REGIONAL CONTEXT

Areas of Outstanding Natural Beauty (AONBs) are nationally important protected landscapes. The 46 Areas of Outstanding Natural Beauty (AONB) in England, Wales and Northern Ireland cover just under 20% of the UK. The distinctive character and natural beauty of AONBs make them some of the most special and cherished places in which to live and to visit.

In England AONBs are living, working landscapes that contribute some £16bn every year to the national economy. Although home to less than half a million people (under 2% of England's population), over two thirds of England's population live within half an hour's drive of an AONB and around 150 million people visit English AONBs every year, spending in excess of £2bn.

Together with National Parks, AONBs represent our most outstanding landscapes; unique and irreplaceable national assets, each with such distinctive character and natural beauty that they are recognised internationally as part of the global Protected Areas Family to be managed in the interest of everyone – local residents, businesses, visitors, and the wider public - and protected for future generations.



The south west of England has a particularly rich landscape and environmental resource, with 12 AONBs and part of two others and two National Parks covering more than a third of the region. The Blackdown Hills is one of nine AONBs that lie entirely or partially within the counties of Devon and Somerset. In Devon the AONBs and National Parks together cover 38% of the county, while the figure is 24% in Somerset.

To the south, between Honiton and Axminster, the Blackdown Hills AONB shares a boundary with the East Devon AONB, and not far to the east is Dorset AONB. Looking north, there is a strong visual relationship across the Vale of Taunton with the Quantock Hills AONB and Exmoor National Park. A population of around 150,000 live in the towns close to the AONB.

AONBs and National Parks in South West England  
(Redrawn from original map supplied by Natural England)



### The purpose of AONB designation

AONBs are designated under the National Parks and Access to the Countryside Act 1949.

The purposes of the AONB designation were updated and confirmed by the Countryside Commission in 1991 as follows:

- The primary purpose of the designation is to conserve and enhance natural beauty.
- In pursuing the primary purpose, account should be taken of the needs of agriculture, forestry, other rural industries and the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.

The Countryside and Rights of Way Act 2000 confirmed the significance of AONBs and created improved arrangements for their management. There are two key sections of the Act for AONBs:

- Section 85 places a statutory duty on all 'relevant authorities' to have regard to the purpose of conserving and enhancing natural beauty when exercising or performing any function affecting land in AONBs.
- Section 89 places a statutory duty on local authorities to prepare and review a Management Plan for each AONB in their administrative area.

## CHAPTER 2

### 2.1 ABOUT THIS PLAN

#### What is the Plan for?

This statutory Management Plan sets out the policy framework for the conservation and enhancement of the Blackdown Hills AONB for the next five years. It is a revised and updated version of the previous Management Plan 2014-2019. Its purpose is to:

- Highlight the special qualities and significance of the AONB
- Present a vision for the future of the AONB
- Set out objectives and policies to secure the vision
- Identify what needs to be done, and by whom
- State the condition of the AONB and how the effectiveness of its management will be monitored
- Reflect the views and aspirations of a wide range of AONB stakeholders and parties with an interest in it
- Co-ordinate the work of different partner organisations

Working together with others to achieve success underscores all AONB Partnership work. As the principal strategic guidance for the Blackdown Hills AONB, the plan therefore provides the basis to:

- Inform and influence decisions
  - Stimulate and prioritise action
  - Promote collaboration
  - Help prioritise resources
- in respect of the AONB.

The plan is based on robust evidence that is regularly reviewed, to give an up-to-date status of the 'health' of the AONB and to underpin decision making. In 2017, a State of the Blackdown Hills<sup>1</sup>

report was produced to provide base line and trend data to inform the Management Plan review process.

#### Who is the Plan for?

It has been prepared by the AONB Partnership on behalf of local authorities but it is a plan for the AONB, not an organisation and provides a framework to help guide all activities affecting the AONB. All those that have an active interest and role in the management of the Blackdown Hills landscape and in supporting the communities that live and work within it have a role in implementing the Management Plan through individual action as well as partnership working. Its audiences include:

- Local authorities – the organisations that are required to prepare, adopt and review the Management Plan, and who carry out key functions, such as planning, that affect the AONB
- AONB Partnership organisations (see appendix D) – these organisations will have a key role in delivering and championing the Management Plan
- Relevant authorities – all public bodies and statutory undertakers have a duty to have regard to the primary purpose of the AONB; this Management Plan will guide them in fulfilling their statutory duties
- Landowners, land managers and developers – those who own and manage land in the AONB have a vital role to play; the plan aims to guide, support and attract resources for sensitive management of the AONB
- Local communities and businesses – all who live and work in the Blackdown Hills can play an active role in caring for the AONB; the plan identifies some of the priorities for action and ways to become involved

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<sup>1</sup> Available on AONB website

**How does it relate to other plans, strategies and activities?**

As the statutory policy document for the AONB, this plan can be used to guide, inform and support all other plans and activities developed by public bodies and statutory undertakers that may affect the AONB, in line with their duty to have regard to conserving and enhancing natural beauty. It doesn't override the plans and policies of other organisations, who may also be the lead body in respect of responsibility for decision making and implementation. It can also be used as a guide and information base for other organisations, groups and people in and around the Blackdown Hills.

Some of the key links are:

- Local plans: it provides part of the evidence base for local plans including those for transport, waste and minerals
- Development management: local planning authorities have a statutory duty of regard for the AONB when making planning decisions; this Management Plan can be a material consideration and provide the depth of information to support relevant planning decisions
- Community-led planning: it can help inform neighbourhood and parish plans and similar tools
- Local nature partnerships and catchment partnerships: it provides part of the evidence base for their own plans and offers a basis for working in an integrated way at a landscape scale
- Land management and economic investment: it can guide the targeting and prioritising of environmental stewardship grants and other rural economy programmes

## 2.2 KEY EXTERNAL INFLUENCES FOR THE AONB

### Environmental change

While primarily concerned with climate change, environmental change also encompasses local threats resulting from increased global trade and travel, including new or advancing pests and diseases (e.g. Ash Dieback, *Hymenoscyphus fraxineus*). Coping with climate change is likely to be one of the greatest challenges of the 21st century as global warming makes its impact. The latest climate change projections for the south west indicate there are likely to be warmer wetter winters, hotter summers, more extreme weather events (e.g. heat waves, torrential down pours of rain, extreme wind and storm events) and rising sea levels. These changes in climate are likely to create significant impacts which will affect all aspects of the south west's economy, society, infrastructure and the natural environment.

### Political uncertainty

This plan was prepared as negotiations continued to remove the UK from the European Union (EU) and establish a new trading relationship with it. This has significant implications for the UK's rural areas and their management, particularly around:

- national legislation for environmental protection to replace those agreed at EU level
- future investment in agriculture, the environment and rural communities to replace those arising from Common Agricultural Policy and potential changes in policy
- the potential for future cross-Channel co-operation, trade and future marketplace impacts on land-based businesses.

At the time of writing two other processes are in progress:

- Changes in local authority structures and operation

- A review of protected landscapes (the Glover review) will make recommendations to Government in 2019 on the purposes, funding, governance and coverage of England's National Parks and AONBs.

### Economy and reduced public finance

Since the last Management Plan was adopted in 2014, the UK economy, as with many western economies, has experienced lengthy periods of recession and slow growth. There has also been a significant reduction in public spending over this period and the voluntary sector is experiencing a fall in income. There is and will continue to be a knock-on effect in terms of delivery of conservation and enhancement; reduced guaranteed income and increased competition for available funds are making delivery more difficult via the 'traditional' means. Increasingly, the 'civil society' is being expected to adopt responsibility for the parts of their local environment that were supported to a greater extent by public bodies.

### Development pressure and changes to planning policy context

There is a need for additional housing and associated infrastructure to accommodate a growing population and a growth in low-occupancy households. This presents challenges to the AONB's landscape in terms of:

- Land-take for building and infrastructure provision with associated potential landscape and visual impacts
- Increased nutrients being introduced to sensitive river catchments
- Increased recreational pressure from a growing population.

While many areas of the AONB are robust and afford ample opportunities for outdoor recreation, some are particularly sensitive to such disturbance. Meanwhile, to address housing supply and delivery recent years have seen an increased emphasis on neighbourhood planning, the revision of the National Planning Policy Framework (NPPF), and the emergence of joint local plans to

address major urban extensions and expansion (such as the Greater Exeter Strategic Plan).

## 2.3 KEY CONCEPTS WITHIN THIS PLAN

### **Sustainable development**

This Management Plan is underpinned by, and contributes towards delivery of, the United Nations Sustainable Development Goals<sup>2</sup>.

### **Natural capital and the ecosystem approach**

Put simply, natural capital is about nature's assets, while ecosystem services relate to the goods and services derived from those assets. By bringing together three core principles of the ecosystem approach, we can ensure that the threats to the AONB are adapted to or mitigated against and that the benefits we derive from the natural environment (ecosystem services) are safeguarded and enhanced. The principles are:

- The natural systems that operate within the AONB are complex and dynamic, and their healthy functioning should not be taken for granted.
- Those that live, work and visit the AONB benefit from services provided by the natural environment. These services underpin social and economic wellbeing and have a value – both monetary and non-monetary
- Those that benefit from the services provided by the AONB and those who are involved in the management of them should play a central role in making decisions about them. Natural and cultural capital and their relation to natural beauty is more fully discussed in Chapter 3.

Using the Ecosystem Approach and applying the 'bigger, better, more and joined' principles<sup>3</sup> means that the AONB Partnership is helping deliver the aspirations of the Government's 25 Year Environment Plan, its commitment to the delivery of the Aichi Biodiversity Targets under the Convention on Biological Diversity and Biodiversity 2020. The mission for Biodiversity 2020 is "to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent [and resilient] ecological networks, with more and better places for nature for the benefit of wildlife and people"

### **Landscape approach**

The landscape approach and an understanding of landscape character guide the AONB Partnership's work. This fits well with the ecosystems approach as both encourage consideration of the links between various elements of the landscape in their management.

The European Landscape Convention (ELC) promotes the protection, planning and management of landscapes and seascapes and reinforces the approach to landscape character assessment. In line with the convention and the principles of sustainable development, this Management Plan uses an understanding of landscape character to help guide local activity and ensure that planning decisions and management practices conserve and enhance the distinct character and quality of the AONB's landscapes.

Using landscape as a guide the ELC applies to all landscapes; it includes open countryside and urban areas, as well as the coastal and marine environment. Landscape character assessment recognises the holistic nature of the landscape, defined as "part of

<sup>2</sup> <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

<sup>3</sup> Making Space for Nature, Lawton et al, 2010

the land, as perceived by local people or visitors, which evolves through time as a result of being acted upon by natural forces and human beings.” Landscape character goes beyond landscape and scenic beauty - it is about the interaction of people and place over time, encompassing a suite of perceptual and aesthetic qualities and historical, cultural, ecological and economic aspects.

Conservation and enhancement of the character and quality of the AONB landscape lie at the heart of all the chapters in this Management Plan. There are four landscape management strategies that can be used:

- Conserve - for landscapes in good condition with strong character where the emphasis is on protecting the key characteristics of the area
- Enhance - for landscapes where some features have fallen into decline. Management should aim to reintroduce features, improve their management and remove features that detract from the overall character
- Restore - for landscapes where features have been lost or are in a severe state of decline. Management should aim to repair and re-establish characteristic features
- Create - for landscapes where condition is poor and character weak beyond repair. Management should consider creation of a new landscape.

In taking forward these approaches, AONB management tends to focus on large or ‘landscape scale’ initiatives which also tend to be integrated to include many different interests. Smaller, more local projects also have great value in being able to focus on specific issues and secure ongoing community engagement. Here AONB management is about making connections and contributing to a bigger picture.

## CHAPTER 3

### STATEMENT OF SIGNIFICANCE – WHAT’S SPECIAL ABOUT THE BLACKDOWN HILLS

#### 3.1 Natural Beauty

‘Natural beauty’ is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries (Countryside Agency, 2001). These aspects of natural beauty are key physical components of the landscape. However, landscape is also about tranquillity, sensory experiences, cultural associations and the relationship between people and place. It is therefore important that the cultural, perceptual and aesthetic dimensions of landscape are also recognised as elements of natural beauty. Natural England has developed a list of factors that contribute to natural beauty:

<i>Landscape quality</i> - a measure of the physical state or condition of the landscape
<i>Scenic quality</i> - the extent to which the landscape appeals to the senses (primarily, but not only, the visual senses)
<i>Relative wildness</i> - the degree to which relatively wild character can be perceived in the landscape makes a particular contribution to sense of place
<i>Relative tranquillity</i> - the degree to which relative tranquillity can be perceived in the landscape
<i>Natural heritage features</i> - the influence of natural heritage on the perception of the natural beauty of the area. (Natural heritage includes flora, fauna, geological and physiographical features.)
<i>Cultural heritage</i> - the influence of cultural heritage on the perception of natural beauty of the area and the degree to which

associations with particular people, artists, writers or events in history contribute to such perception
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#### 3.2 Special Qualities

The Blackdown Hills Area of Outstanding Natural Beauty has a suite of special qualities that together make it unique and outstanding, underpinning its designation as a nationally important protected landscape. Special qualities may be considered as specific components of ‘natural beauty’, distilling out the key attributes that combine in particular ways to form the natural beauty of the AONB. These are the special qualities individually and in combination that we need to conserve and enhance for the future and they should be considered in all decisions affecting the AONB.

#### 3.3 Overview of the AONB

The Blackdown Hills are a distinctive, diverse rural landscape stretching from the prominent scarp above the M5 in the north to Honiton and Axminster in the south, and from Chard in the east to Culmstock in the west. Ranging from around 50 to 310 metres above sea level, the area is characterised by a sense of relative remoteness and tranquillity, and was designated as an AONB in 1991.

From the dramatic, steep, wooded north-facing scarp, the area dips gently southwards as a flat-topped plateau deeply dissected by valleys. This is the northern part of the East Devon Plateau – one of the finest, most extensive in Britain. The tops are open and windswept; in the valleys villages and hamlets nestle among ancient patterns of small, enclosed fields and a maze of winding lanes lined with high hedgebanks. The steep valleys support a patchwork of woodland and heath, nationally and regionally important habitats

which support a wealth of charismatic and priority species and interesting plant communities.

## Statement of Significance

### 3.4 The Special Landscape Character

Key to the Blackdown Hills designation as an AONB is the subtle combination of four aspects of the landscape (*The Blackdown Hills landscape: A landscape assessment*. Countryside Commission, 1989):

*It is an isolated and unspoilt rural area* and remains relatively undisturbed by modern development and so ancient landscape features, special habitats, historical and archaeological remains have survived intact. There is a sense of stepping back in time in the winding lanes, the hidden valleys and relatively remote villages. The traditional pattern of villages, hamlets, paths and roads remains largely unchanged and there is an identifiable and characteristic vernacular, pastoral landscape.

*There is a diversity of landscape patterns and pictures.* The visual quality of the landscape is high and is derived from the complex patterns and mosaics of landscapes. Although the scenery is immensely varied, particular features are repeated. Ancient, species-rich hedgerows delineate the fields and define the character of the landscape, enclosing narrow twisting lanes. There are long views over field-patterned landscapes. The high plateau is dissected by steep valleys, supporting a patchwork of woodland and heath, and fine avenues of beech along the ridge. The history of medieval and parliamentary enclosures has resulted in an

individual, patchwork landscape of small fields in the valleys and larger fields with straight hedges on the plateau.

*A unique geology.* The composition of the underlying geology of the Blackdown Hills and the adjoining East Devon AONB is unique in Britain and is one of the area's strongest unifying features. It has given rise to the distinct topography of a flat-topped plateau, sharp ridges and spring-lined valleys. The springs have created the characteristic pattern of rough grassland, mire and woodland vegetation on the valley sides. The nature of the Greensand rock has meant that plant communities are particularly diverse. Moreover, the geology has provided a local building material, chert, which is uncommon elsewhere.

*It is a landscape with architectural appeal.* The landscape pattern is punctuated by a wealth of small villages, hamlets and isolated farmsteads of architectural value and distinctive character. Devon and Somerset are recognised nationally for their fine rural architecture, but the Blackdown Hills contain a special concentration of buildings where the vernacular character is particularly well preserved. Predominant materials are chert and cob with thatch, often now replaced by corrugated iron, or clay-tiled roofs. The appeal lies in the way in which the buildings fit so naturally into their surroundings.

### 3.5 The Special Historic Landscape

The Blackdown Hills landscape has great time depth, from prehistoric through to modern:

*Prehistoric to Roman times* There are significant concentrations of early prehistoric evidence in the AONB. Large numbers of Mesolithic flint and chert tools have been found, along with Neolithic causewayed enclosures. Later prehistoric features include Bronze Age round barrow cemeteries and isolated barrows, and large Iron Age hillforts that take great advantage of the local topography. Of the 25 Scheduled Monuments in the area, 10 are Bronze Age barrows or barrow cemeteries and seven are hillforts.

Peat deposits in springline mires provide information back to prehistoric times, and the preserved pollen records show changes from woodland to pastoral and arable farming.

The Roman period is represented by military use of the Iron Age hillfort at Hembury, the later bath-house at Whitestaunton and several 'Romanised' farms.

*Medieval period* Key medieval sites include Castle Neroche, an early Norman earthwork castle built on an earlier Iron Age defended site, and Hemyock Castle, a fortified manor house of the late medieval period. Dunkeswell Abbey, founded in the 13th century, had a significant influence on the landscape through its grange farms and probable involvement in iron production.

The Blackdown Hills' distinctive field patterns and many dispersed farmsteads and hamlets originate from medieval times. Across the area are properties and settlements that were recorded in the Domesday Book. Historic landscape characterisation projects have

identified a high proportion of the landscape as being of medieval origin. Enclosed, former medieval strip fields are well preserved throughout the AONB. Irregular fields and massive hedges in the valleys represent land taken directly into cultivation from woodland in the medieval period.

There is an extraordinary concentration of medieval buildings in the villages, as well as many deserted or shrunken medieval and post-medieval settlements, which reflect the ebb and flow of agriculture on marginal land. Ancient woodland, surviving from the medieval period, is still well represented, particularly on the northern escarpment. The Royal Forest of Neroche was finally enclosed in the 1830s but traces of the old woodbanks still survive.

*Modern* Parliamentary Inclosure of former commons on the plateau tops in the 19th century has created distinctive landscapes of large regular fields with straight roads and beech hedges. Beacon Hill in Upottery was the last area of England to be enclosed some 100 years ago.

The Wellington Monument, a prominent feature on the northern skyline, commemorates the battle of Waterloo. The AONB also contains important evidence from the World War Two – the three airfields at Culmhead (Trickey Warren), Dunkeswell and Upottery (Smeatharpe). As well as the runways, a wide range of structures still survives at all three sites including pillboxes, aircraft dispersal pen and technical and domestic buildings. Some have been designated as Scheduled Monuments or Listed Buildings. Since World War Two, there has been a substantial loss of hedgerows and orchards to meet the needs of modern agricultural; simplifying parts of the landscape and masking their early origins.

These landscapes of the Blackdown Hills have been created by the interplay of people and the land over many centuries:

The **unique geology** of the area has had a strong influence on the industrial archaeology and landscape. Iron production is thought to have started locally in the later Iron Age, it was an important Roman industry and continued into the Middle Ages. Recent finds in Hemyock suggest an intensive iron industry existed in the late 9th and early 10th centuries. The iron ores were found at the junction of the Upper Greensand and the capping clay layer. The cratered landscape of opencast iron workings can still be seen in places on the plateau tops, such as Culm Davy, and heaps of iron slag are widespread.

Mining of a hard seam of stone within the greensand for whetstone production reached its heyday in the 18th and 19th centuries. Indications of the mines can still be seen on the western escarpment around Blackborough and Broadhembury. There are claypits associated with medieval and post-medieval pottery production (a vast hoard of medieval pottery pieces found in Hemyock suggests it was an important local industry) and a number of largely 18th and 19th century limekilns particularly around the Bishopswood and Wambrook area.

In terms of **literature and the arts**, over the centuries the Blackdown Hills landscape has inspired writers and artists who have left a legacy of cultural associations. Celia Fiennes, Daniel Defoe and Rev John Swete all travelled through the area providing informative descriptions and historic perceptions of the landscape.

In the early 20th century the Camden Town Group of artists, including Robert Bevan, Charles Ginner and Spencer Gore used the patterned rural landscape as inspiration for their impressionist

paintings that provide records of the past. Today the texture, colour and light of the Blackdown Hills continue to influence artists.

The AONB has a distinctive **local style of architecture**. Local materials such as chert, cob, thatch and clay tiles are used extensively, as well as limestone and Beer stone. The large number of surviving late medieval houses is exceptional. Many are Grade II\* Listed Buildings and contain particularly fine woodwork screens, ceilings and jetties; there are fine examples in Broadhembury.

Historic farmsteads are a key part of the AONB's architectural, agricultural and social heritage, and they too still survive intact and with unchanged associated farm buildings in exceptional numbers. Most farmsteads and hamlets are in sheltered valleys, often terraced into the hills. Villages are often at river crossings and crossroads in the valley floors, generally clustered around the parish church. Small stone houses often directly front or butt gable-end on to the narrow lanes. Topography often influences settlement pattern, such as Membury where the village straggles along the valley and Blackborough, where it follows the escarpment.

In terms of **landscape features**, although designed landscapes are not widespread within the AONB, there are some features that make a significant contribution. The Wellington Monument built between 1817 and 1854 is iconic, defining the north-west escarpment. Much of a Victorian designed landscape including walled garden, lakes and leats, still survives on the Otterhead Estate. Similarly, the large Victorian manors at Upottery and on the Tracey Estate, Awliscombe have gone, but their parkland, formal garden features and ancillary buildings can still be seen.

### **3.6 The Special Natural Environment**

The biodiversity of the Blackdown Hills is one of its greatest assets. The unique geology and landscape patterns of the area have combined with traditional land management, climate and clean air to support a rich diversity of habitats and species. This immense variety, with patches of valuable habitat scattered throughout the landscape, is notable; these include flower-rich meadows, ancient hedgerows, springline mire, wet woodland, heathland, calcareous grassland, ancient woodland, fen and bog. At a micro-scale there is an abundance of lichens, mosses and fungi. Bees, butterflies, birds, bats and many other animals, some nationally scarce, thrive in the Blackdown Hills, feeding and breeding in the habitats the area provides. These habitats and wildlife bring colour, texture, sound and life to the landscape, epitomising the mental picture of the 'English Countryside', which has, in reality, long since disappeared elsewhere.

The AONB is characterised by its intricate patchwork of semi-natural habitats, scattered throughout the landscape. This includes patches of woodland habitat, although there are larger concentrations of woodland to the north of the AONB. Of particular note are the valuable plant communities that arise along the springlines, where the Greensand meets the clays, supporting wet grassland, heathland, mire (i.e. purple moor-grass and rush pastures) and woodland habitats. Linear features such as hedgerows, rivers and streams help to link habitat patches, forming a network that allows species to move through the landscape. The majority of habitats are under agricultural or forestry management and in private ownership.



Bog flora

### **3.7 Summary of the special qualities and distinctive characteristics of the Blackdown Hills AONB**

From the diverse characteristics, features and qualities outlined previously, the table on the next pages summarises the special qualities that combine to create the particular sense and spirit of place that gives the Blackdown Hills its distinctive identity in relation to natural beauty factors. These special qualities require protection, conservation and enhancement if the AONB is to retain its character and status among England's finest landscapes.

The AONB's Landscape Character Assessment adds further understanding of the contrast and diversity of the AONB landscape and its management requirements.

Natural Beauty	Special qualities (including distinctive characteristics and key features)
<b>Landscape quality</b>	<ul style="list-style-type: none"> <li>• A managed landscape sculpted and maintained by the stewardship of generations of those who work the land</li> <li>• Undeveloped skyline of the northern scarp slope is a prominent feature in views from the Vale of Taunton and beyond</li> <li>• Rich mosaic of diverse and interconnected semi-natural habitats; a patchwork of woodland, heathland, meadow and mire linked by hedgerows</li> <li>• Clear, unpolluted streams that meander down the valleys to feed the Yarty, Otter, Culm rivers</li> <li>• Ancient and veteran trees in hedgerows, fields and woodland</li> <li>• A settled landscape with a strong sense of time-depth containing farms and small scattered villages well related to the landscape</li> </ul>
<b>Scenic quality</b>	<ul style="list-style-type: none"> <li>• The elevation and long, panoramic views out from the Blackdown Hills create a sense of detachment from surrounding towns and transport corridors</li> <li>• Unspoilt, panoramic views across flat-topped plateau and straight undisturbed ridge tops and over hidden valleys</li> <li>• A well-wooded pastoral landscape with a strong pattern of hedges and hedgerow trees</li> <li>• Pattern of regular, large-scale enclosure fields on the plateau contrasts with the smaller, curving medieval fields on the valley slopes</li> <li>• Majestic avenues of beech trees along northern ridges</li> <li>• Long straight roads across the plateau with verges and low, neat hedges give way to narrow, enclosed, high-hedged winding single-tracked lanes in the valleys</li> <li>• Wellington Monument is a key landscape feature identifying the Blackdown Hills over a very wide area in all directions</li> </ul>
<b>Relative wildness</b>	<ul style="list-style-type: none"> <li>• A sense of remoteness enhanced by the exposure of the plateau and more intimate extensive woodland of the upper slopes and hidden valleys</li> </ul>

	<ul style="list-style-type: none"> <li>• Wide open spaces provide exposure to the elements; big sky, windswept places, contrasts of sunlight and shadow</li> </ul>
<b>Relative tranquillity</b>	<ul style="list-style-type: none"> <li>• Areas of high tranquillity spared many of the intrusions of modern life</li> <li>• Places to enjoy natural sounds; the melody of the song thrush and skylark, the call of buzzards</li> <li>• Dark night-time star-filled skies contrasting with the light pollution of the surrounding towns</li> </ul>
<b>Natural heritage features</b>	<ul style="list-style-type: none"> <li>• One of the finest, most extensive Greensand plateau in Britain; a distinctive landform that contrasts with the surrounding lowlands to the east, north and west</li> <li>• The presence of straight, uninterrupted ridges are evident as a visual backdrop over a wide area</li> <li>• Distinctive springline mires located around the upper slopes of the valleys</li> <li>• The varied landscape supports a rich assemblage of wildlife including many species of bats, butterflies and meadow flowers and healthy populations of ferns, lichens, mosses and fungi</li> <li>• Ancient, species-rich hedges with many hedgerow trees and flower-rich banks; colourful displays of primrose and bluebells in spring</li> <li>• A network of ancient semi-natural woodland linked by hedgerows support a thriving dormouse population</li> <li>• Streams and rivers are home to otters, lamprey and the vulnerable white-clawed crayfish</li> </ul>
<b>Cultural heritage</b>	<ul style="list-style-type: none"> <li>• The number and extent of well-preserved buildings in the local vernacular – chert, cob and thatch – are an important element of the landscape</li> <li>• Hillforts are prominent features on the ends of the plateau ridges</li> <li>• Mining remains from the once internationally significant whetstone industry and extensive evidence of iron-working</li> <li>• Three World War Two airfields and their associated buildings are found on the high, flat land of the plateau</li> <li>• A community with a strong sense place closely linked to the land and its management, with a particularly strong tradition of hedge laying</li> <li>• A landscape that has inspired artists from the early 20th century Camden Town Group to the Blackdown Hills Artists and Makers of today</li> </ul>

### 3.8 Natural Capital Stock and Ecosystem Service Flows

#### Why this is relevant to the AONB

Natural capital and the elements of natural beauty have a natural overlap: largely they are ways of categorising the landscape and some of the benefits we derive from it.

Understanding natural capital underlines the AONB commitment to delivering the Government's 'Biodiversity 2020 A Strategy for England's Wildlife and Ecosystem Services'. This identifies a series of 'desired outcomes' including that "by 2020, at least 17% of land and inland water, especially areas of particular importance for biodiversity and ecosystem services, [will be] conserved through effective, integrated and joined up approaches to safeguard biodiversity and ecosystem services including through management of our existing systems of protected areas and the establishment of nature improvement areas."

#### Definitions

Many of the elements which make up the natural beauty of the AONB can be described in terms of natural and cultural capital. Natural capital refers to both the living (e.g. fish stocks, forests) and non-living (e.g. minerals, energy resources) aspects of nature which produce value to people, both directly and indirectly. It is this capital that underpins all other capital in our economy and society, including cultural capital which is the historic environment and cultural landscape (as described in chapter 4). Cultural capital is increasingly being seen as a 'missing element' of a purely 'natural' approach to this way of categorising and defining the environment. Natural and cultural assets are the actual stock: living and non-living parts. From these assets we derive a flow of benefits known

as ecosystem services. Essentially, natural capital is about nature's assets, while ecosystem services relate to the goods and services derived from those assets.

The landscape of the AONB provides a lot to those that live, work and visit here, from the quantifiable benefits of fresh food and clean water to those that are harder to define such as mental health benefits from contact with the natural environment. These benefits can be defined as 'ecosystem services', all critical to maintaining human health and wellbeing. They are categorised into four:

- **Provisioning services:** the products we gain and use from the AONB, such as food, energy and water
- **Regulating services:** the natural functioning of the AONB purifies water, pollinates crops and maintains air quality
- **Cultural services:** non-material benefits derived from interaction with the AONB, such as inspiration, education and spiritual connection
- **Supporting services:** the foundations for all other services – primary production (carbon fixation), the formation of soil, nutrient cycling and water cycling.

A high-quality landscape (of rich natural and cultural heritage) delivers wide economic benefits. Some ecosystem services have related economic markets, some do not. Those that don't can be considered 'public goods.'

#### Public goods

Some ecosystem goods and services that flow from the landscape's natural and cultural assets have a market which rewards the producer. Farming and forestry, although frequently not high return

enterprises, are nonetheless producing goods for a functional marketplace.

However, some goods and services do not have a fully functional marketplace, for example farmers who maintain species rich grasslands are not rewarded by the market for the external value of that work. These are known as 'public goods' as they are non-excludable (i.e. no-one can be stopped from benefiting from that good) and nonrival (one person's enjoyment does not preclude another's). Private markets may develop for some of these goods in the future, but while they do not exist public investment should be made to adequately reward the conservation of natural assets.

Public goods for the AONB can be considered to include:

- conservation of biodiversity
- conservation of built heritage
- maintenance of characteristic landscape features such as hedges and tree clumps (these will vary by landscape character area)
- providing clean air and water by taking uneconomic land management choices to reduce pollution (e.g. stopping fertiliser applications)
- maintaining rights of way
- providing educational access

Some of the key goods and services provided by the Blackdown Hills include:

- AONB farmers and foresters produce food, fibre, timber and wood fuel.

- The AONB lies over an Upper Greensand aquifer providing water for both public and private supplies. The sources of the rivers Culm, Otter and Yarty and some of the river Tone headwaters are in the Blackdown Hills and wetland mires help attenuate flows and trap sediment
- Carbon storage in woodland, lowland heathland and peat deposits, for example in turbaries.
- Hedgerows, rough grassland, wood pasture and woodland help to regulate soil erosion and water flow and support nutrient cycling
- Species rich grasslands are biodiverse and support pollinating insects
- Historic heritage features link and add value to the natural heritage stock as well as having cultural heritage value in their own right
- Recreational opportunities support the health and wellbeing of both residents and visitors
- The characteristic and richly patterned landscape and ancient features provides a strong sense of place and history
- The distinctive landform and coherent landscape are inspirational at a personal, cultural and spiritual level.
- The AONB gives access to clean air, tranquillity and freedom from noise and light pollution.

## CHAPTER 4

### 4.0 Introduction to Management Framework

This part of the Management Plan sets out the objectives and policies for managing the AONB over the next five years to work towards achieving the longer-term vision.

There are three main themes divided into several topics:

**Place** – topics related to the primary purpose of conserving and enhancing natural beauty:

- Landscape Character
- Historic Environment and Cultural Heritage
- Biodiversity and Geodiversity
- Natural Capital and ecosystem goods and service
- Farming, Forestry and Land Management

**People** – topics related to the secondary purposes of recognising the economic and social needs of the local community, promoting sustainable development and recreation:

- Access and Enjoyment
- Planning and Development
- Transport and Highways
- Rural Economy and Tourism
- Community and Culture

**Partnership and Promotion** – the core functions of AONB management:

- Communication, Education and Awareness
- Partnership and Management

Each *theme* starts with identifying the key issues, opportunities and challenges under Forces for Change. It is not a list of every issue facing the area.

Each *topic* is structured in the same way; the aim is stated and then background information describes the significance to the Blackdown Hills and the local context. An objective and set of policies are then identified.

Explanation of terms used:

Aim – the overall ambition for this topic area

Objective – what we want to achieve

Policy – what needs to be done to achieve the objective

The final section, **Chapter 5**, is *Delivery*, which explains the roles and responsibilities of the AONB Partnership, individual organisations and others in delivering the plan, and further information about monitoring and measuring progress. A *Strategic Delivery Plan* outlines the strategic priorities and associated actions for the next 5 years necessary to deliver the ambitions of this plan. The separate annual AONB Business Plans will translate these into specific roles for partners working in collaboration with the AONB team across key work areas.

The *appendices* set out detailed information in support of the management plan in relation to Planning and Development, the legislative background and lists AONB Partnership organisations. A separate *Annexe* of supporting information is also being prepared to provide a range of technical and statistical information, including Devon landscape character assessment, species, habitats and sites, Census data and other additional data.

# Theme 1: Place

## Forces for Change - key issues, opportunities and challenges:

- A range of opportunities through delivery of Defra's 25-year plan to improve the environment, including:
  - The review of protected landscapes
  - Delivering new Environmental Land Management Schemes
  - Planting new woodlands at appropriate locations
  - Promoting Natural Flood Management
  - Delivery of a Nature Recovery Network (and priority species recovery/ re-introduction)
  - Expanding forestry and woodland product markets (including woodfuel)
  - Delivery of Forest Design Plans and Open Habitats Policy
  - Increased recognition of natural assets and ecosystem services through adoption of a Natural Capital approach
  - Emerging markets for Payments for Ecosystem Services and Nutrient Offsetting
- Potential to use enhanced data and evidence (for example Historic Environment Records) to identify areas for externally funded projects to restore and protect features.
- Increase in catchment-scale approaches to water management including Natural Flood Risk Management schemes offers potential to restore natural ecosystems, improve water quality and reduce risk of flooding downstream but also pressure to change the character of the landscape.
- Climate Change, leading to:
  - Shifts in species ranges
  - Reduced species diversity and abundance
  - Increased pests and diseases
  - Extreme weather events
  - Changing growing conditions, affecting ability to grow certain crops but also offering new opportunities
- Market failure of rural businesses, leading to:
  - Biodiversity, natural assets and ecosystem services being undervalued in decision making
  - Inappropriate or lack of management
  - Poor succession planning and reduced opportunities for new entrants
  - Land abandonment/change to non-farmed use
  - Homogenisation of the landscape
  - Adoption of damaging practices
- Considerations around planting alternative tree species, to compensate for loss through ash dieback and other diseases, or more drought tolerant species in relation to climate change
- Development pressure, including major urban extensions in the setting of the AONB and recreation and traffic pressure, from both residents and visitors.

## 4.1 Landscape Character

*Aim:* The Blackdown Hills remains an unspoilt rural area, with a diversity of landscape patterns and pictures, a unique geology and buildings of architectural appeal, that are all understood and referred to. It is a truly 'living landscape' benefitting from its special landscape and heritage and is appreciated as such

### Background

It is the diverse landscape, the distinctive villages, the historic environment and the tranquil rural setting that gives the Blackdown Hills its special sense of place. The relationship between people and the landscape is enshrined in the European Landscape Convention and recognises that landscapes evolve through time due to natural and human forces. The challenge for the AONB Partnership is to manage change to ensure that the AONB landscape remains special.

One of the special qualities of the AONB is its visual relationship with other landscapes, and in particular the view of the steep escarpment of the Blackdown Hills rising out of the Vale of Taunton. The wooded edge to the plateau provides a relatively wild, uninhabited backdrop to the flatter, low-lying farmed and settled Vale. The juxtaposition of these contrasting characters means that one enhances the other. The Wellington Monument provides a single focus to the scene and enriches the cultural history of this landscape. This scenery can be appreciated from much of the Vale but makes for dramatic views from southern slopes of the Quantock Hills AONB and the eastern fringes of Exmoor National Park. There are expansive and far-reaching views from the Blackdown Hills across much of Devon and Somerset, including views to Dartmoor from Culmstock Beacon and the Jurassic coast from Membury.

The setting of an AONB is the surroundings in which the influence of the area is experienced. If the quality of the setting declines, then the appreciation and enjoyment of the AONB diminishes. Large scale development, the construction of high or expansive structures, or a change generating movement, noise, intrusion from artificial lighting, or other disturbance will affect the setting. Views are one element of setting, being associated with the visual experience and aesthetic appreciation. Views are particularly important to the AONB. This is because of the juxtaposition of high and low ground and the fact that recreational users value them. Without husbandry and management, views within, across, from and to the AONB may be lost or degraded.

Landscape character describes the qualities and features that make a place distinctive. It can represent an area larger than the AONB or focus on a very specific location. The Blackdown Hills AONB displays a variety of landscape character within a relatively small, distinct area. These

local variations in character within the AONB’s landscape are articulated through the Devon-wide “Landscape Character Assessment” (LCA)<sup>4</sup>, which covers the entire AONB. Hidden characteristics and past land uses are identified in county-based Historic Landscape Characterisation (HLC). These assessments are now extensively used in planning and land management to understand and describe the landscape and manage pressures for change.

**Landscape character map**

The distinctiveness of the Blackdown Hills includes the area’s relative remoteness, timelessness and tranquillity. Its very character relies on retaining a natural feeling without being over managed. Although hard to quantify it is all too easily lost through, for example, increasing standardisation, creeping suburbanisation, changing agricultural practices and loss of distinctive elements of the natural and historic environment. Each individual case may not have a significant impact, but cumulatively they can erode the area’s distinctive character.

Natural starry skies are one of the sights which make the Blackdown Hills so special. Night time darkness is a key characteristic of the area’s sense of tranquillity and relative remoteness. The Blackdown Hills is the fifth darkest AONB in England, with very low levels of night time brightness; 95% of the AONB is in the two very darkest categories as evidenced by 2016 research by CPRE.

**CPRE dark skies map**

**Management objective and policies**

Objective LC	Policies
To ensure that the distinctive character and qualities of the Blackdown Hills landscape are understood, conserved, enhanced and restored	LC1 Approach the conservation and enhancement of the AONB based on landscape character underpinned by comprehensive and up-to-date evidence bases that are also made widely available to decision makers and others
	LC2 Understand clearly the social, environmental and economic benefits of landscape and natural beauty and ensure this is reflected in decision making at every level, supported by sound evidence
	LC3 Promote high levels of peace and tranquillity with dark night skies by minimising noise, intrusive development and light pollution
	LC4 Support local distinctiveness

<sup>4</sup> To be detailed in online supporting annexe in final plan

	LC5 The character of skylines and open views into, within and out of the AONB will be protected
	LC6 The deeply rural setting of much of the land adjoining the AONB boundary forms an essential setting for the AONB and care will be taken to maintain its quality and character
	LC7 Opportunities will be sought to strengthen landscape character by improving condition of landscape features in poor condition and reinstating landscape features identified as missing or fragmented

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## 4.2 Historic environment and cultural heritage

*Aim:* The AONB's cultural heritage, from its archaeological sites and historic buildings through to the unique arts and crafts produced today, is recognised as an intrinsic part of the landscape and special qualities of the AONB. It is conserved, enhanced and enjoyed and adds value to the local economy. Local communities are actively engaged in celebrating the cultural heritage, keeping the skills and traditions alive and sensitively shaping its future

### Background

The Blackdown Hills AONB retains a strong sense of continuity with the past and the landscape has great time depth, from prehistoric through to modern. Centuries of human activity have created the intricate patterns of woods, heaths and fields, lanes and trackways, and hamlets and villages that contribute greatly to the AONB's unique historic character. Designated heritage assets in the AONB include 768 Listed Buildings (13 Grade I, 47 Grade II\* and 708 Grade II), which is up from 762 in 2013. As a result of positive management, only three Scheduled Monuments from 26 are considered at risk, compared to eight in 2013.

The Blackdown Hills AONB has been a relatively under-studied landscape to date. To help address this between 2016 and 2018 an archaeological aerial investigation, centred on the AONB, was undertaken by a project team of staff from AC archaeology and Devon County Council. It was funded by Historic England and hosted by Devon County Council within the Historic Environment Team in partnership with Somerset Historic Environment Record. The survey area covered 564 square kilometres in Devon and Somerset, focused around the AONB, which has seen little systematic archaeological survey and where the archaeological resource was relatively poorly understood. In addition, the historic environment is under pressure from potential impacts as diverse as initiatives to reduce diffuse water pollution to road improvement schemes.

The project consulted over seven thousand hard copy aerial photographs loaned from the Historic England Archive and held by Devon County Council, as well as modern digital datasets of vertical aerial photographs. However, it was the remote sensing technique known as lidar that proved to be exceptionally useful during this project, enabling features obscured by tree cover and those that survived only as slight earthwork remains to be mapped and recorded. In total, 5052 archaeological or historic sites were identified from the aerial imagery and recorded on the relevant Historic Environment Record (HER); 87% of these had not previously been recorded.

A number of different 'themes' became apparent as the project progressed. These included: extractive pits, changing fieldscapes, cider making, fortification and control and religion and ceremony. Full details are available from <https://new.devon.gov.uk/historicenvironment/the-devon->

historic-environment-record/blackdown-hills-aim-project/ The individual monument records are all available online via either the Somerset Historic Environment Record<sup>5</sup>, the Devon Environment Viewer<sup>6</sup> and Heritage Gateway<sup>7</sup>.

Surprisingly, by far the most numerous type of monument were extractive pits, which made up over a third of all features recorded. These unprepossessing features make a huge contribution to the distinctive landscape of the AONB. They became wooded, sometimes by deliberate planting of orchard trees, producing the many small tree clumps that dot the hills. These scattered pits were for extraction of clay, marl, gravel, chalk and sand, reflecting the varied geology of the project area. Although difficult to date, the size and definition of the earthwork, type of vegetation cover, comparison with historic maps, field patterns, field names and other evidence can help to infer the date of use. Some pits may originate in the medieval period, whilst others were in use right up to the 20th century. Many of the gravel pits for instance might have been associated with improvements to roads in the 18th and 19th century, whilst chalk pits are often seen in conjunction with lime kilns of similar date, having been used to produce agricultural lime.

The scattered and often small-scale pits form a marked contrast to the much more intensive Roman-medieval iron ore and 18th-20th century whetstone mining industries on the western part of the AONB.

Changing fieldscapes: Relict or removed field boundaries were the second most numerous monument type recorded during the survey, at a fifth of the total. Many have a curvilinear form, enclosing small and irregularly shaped fields, which suggests a medieval origin. A high proportion were seen in areas recorded by Historic Landscape Characterisation as medieval enclosures, presumably having gone out of use during later land reorganisation and field amalgamation.

About 80% of the removed boundaries were recorded as earthworks, some of them very wide shallow ditches suggesting that there may have been substantial drainage banks associated with them in certain areas. Only an eighth were visible just as cropmarks, testament to the generally good survival of earthwork remains within the project area.

Cider making: parallel rows of tree planting banks for cider orchards were still very often visible in the more poorly draining mudstone areas. As well as assisting with drainage, these increased the soil depth and could be augmented with other helpful inclusions, such as sand and road scrapings known as 'waydrift'. Some of these orchards seem to have been long-lived, attributed by Marshall in 1796 to the Devonshire practise of replanting in between failed trees and so helping to avoid disease.

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<sup>5</sup> [www.somersetheritage.org.uk/](http://www.somersetheritage.org.uk/)

<sup>6</sup> <http://map.devon.gov.uk/dccviewer/>

<sup>7</sup> <http://www.heritagegateway.org.uk/gateway/>

Fortification and control: Some of the earliest defended sites visible on aerial imagery were the Iron Age hillforts at prominent sites such as Hembury, and the mapping of their ramparts and ditches, as well as some internal features, emphasises just how imposing these sites must have been. Medieval defended sites are relatively rare, but alongside well-known places like the imposing Castle Neroche, examination of recent lidar data seems to confirm that three small motte and bailey castles were sited just to the south of the AONB at Widworthy, Bushy Knap and Buckerell Knap.

Religion and ceremony: Neolithic ceremonial or funerary monuments are rare and it was notable to add a possible long barrow at Broadhembury to the Historic Environment Record, which was first recognised from cropmarks on aerial photographs taken in 1989. More frequently observed were indications of the more familiar circular Bronze Age barrows, particularly on the prominent greensand plateau. Several additional examples were added, not just to known cemeteries such as Robin Hood’s Butts but also potential ‘new’ clusters, eg at Hartridge.

Well-known sites such as Dunkeswell Abbey also benefit from the in-depth study of aerial imagery, and in this instance lidar was again crucial in mapping subtle features within the inner precinct that might relate to provisioning – perhaps a dovecote or stewpond, and other ancillary structures. Parchmarks of the east range, that had been noted since the 19th century, could finally be accurately plotted from aerial photographs taken in 1989. It is possible that the exact site of the monastic grange of Bowerhayes has also now been identified.

**Management objective and policies**

Objective CH	Policies
To ensure effective conservation, management and understanding of the Blackdown Hills historic environment, including historic buildings, archaeological sites and heritage landscapes	CH1 Conserve and enhance the historic built environment and rural heritage assets and integrate into other land management initiatives in the AONB
	CH2 Regularly monitor the extent and condition of historic sites, features and landscapes in the AONB and promote the use of Historic Environment Record (HER), historic landscape characterisation and other tools to inform projects, policy-making and management activities
	CH3 Gain a comprehensive understanding of the reasons for heritage being ‘at risk’ and in declining condition and make direct interventions to bring Scheduled Monuments and unscheduled sites into positive management and improving condition
	CH4 Encourage and support training in traditional heritage skills.
	CH5 Promote the sensitive interpretation of the AONB’s historic environment to ensure local communities and visitors gain a good understanding and experience of place

### 4.3 Biodiversity and Geodiversity

*Aim:* The AONB's nationally important wildlife and unique geology are conserved and enhanced and there are thriving populations of important species. All the natural heritage of the AONB is understood and appreciated.

#### Background

The biodiversity of the Blackdown Hills is intrinsic to the area's character and aesthetic appeal. The wide variety of species and habitats<sup>8</sup>, reflects the complex landscape patterns, unique geology and traditional management of the area. Its mosaic of priority habitat includes spring line mire, heathland, woodland and species rich grassland, all connected via hedges and banks. The Blackdown Hills is noted for its butterflies (in particular marsh fritillary, small pearl-bordered, duke of burgundy, wood white and brown hairstreak) as well as dormice and its woodland bird assemblage. Its rivers contain water vole, white-clawed crayfish and lampreys.

The Blackdown Hills AONB is a connected landscape and supports coherent and resilient ecological networks, demonstrating the Lawton *Making Space for Nature* principles of bigger, better, more and joined. However, some habitats are fragmented and the condition of priority habitats are fragile and degraded in some areas, so restoration and connectivity of priority habitat is a high priority for both biodiversity and delivery of other ecosystem services. A greater age and species diversity in woodlands and hedgerow trees, for example, will benefit biodiversity and improve resilience.

Some areas of the highest conservation value are nationally important Sites of Special Scientific Interest (SSSIs), covering 639ha of the AONB. Under Biodiversity 2020, the desired outcome nationally is for at least 50% of SSSIs to be in favourable condition, while maintaining at least 95% in favourable or recovering condition. In the Blackdown Hills 2018 figures show that only 19% (122ha) are deemed to be in favourable condition, with 75% unfavourable recovering (477ha). There are some specific technical reasons for so few sites being favourable (often because parts of sites do not fully meet the 'standard' site/habitat expectations), but the large percentage of sites in a recovering condition is positive. This category has seen a significant increase since 2008 when 40% (254ha) were classed as unfavourable recovering, and over the same period the area considered unfavourable declining has moved from 118ha to none.

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<sup>8</sup> To be detailed in online supporting annexe in final plan

In addition to the sixteen SSSIs, there is one Special Areas of Conservation (SACs) of European importance for nature conservation.<sup>9</sup> This is located at Quants in the north of the Blackdown Hills, selected for its population of marsh fritillary butterflies, that occur on spring line mire habitat mosaics. Maintaining a viable population for this species requires a landscape-scale approach to connect fragmented populations further south in the Bolham Valley. Just beyond the AONB boundary to the south east is the river Axe SAC and the river Yarty, a major tributary, rises and flows through the AONB for the vast majority of its length. The Axe is designated as a watercourse with a chalk influence with presence of water crowfoot species. The priority for the SAC is to reduce diffuse pollution (mainly phosphates and sediment largely from agriculture) to improve water quality.

The geology of the Blackdowns Hills AONB is dominated by one of the finest and most extensive plateaux in Britain – the East Devon Plateau – dissected by the long, deep valleys of the rivers Culm, Otter, Yarty and their tributaries. The AONB has two geological SSSIs covering 3.5ha – Furlley Chalk Pit and Reed’s Farm Pit.

The AONB might be likened to an irregularly cut layer cake, with near horizontal beds of soft rocks deposited one on top of the other, the youngest at the top. The lower layer, exposed in the river valleys, is marl (red Mercia Mudstone), replaced with Lias in the east. A 30-metre layer of Upper Greensand rests upon this, outcropping as an abrupt rim to the valleys and capping the conspicuous northern scarp slope. The composition of Upper Greensand layer, which underlies much of the East Devon Plateau, is unique in Britain. This is covered by a superficial deposit of Clay-with-Flints-and-Cherts.

At the junction of the greensand and clay iron ores were found and the chert-tempered local clay supported a medieval pottery industry around the Membury/Axminster area and later in Hemyock, while the almost indestructible chert is used extensively for buildings and walls. On the western edge of the AONB the Upper Greensand produced well-preserved fossils, and the area around Kentisbeare and Broadhembury was famed for its whetstone industry in the 18th and 19th centuries.

Soils provide a strong link between the physical environment and the wildlife, land use and cultural landscape. For example the dark-topped, organic and peaty soils found on the plateau gives an indication of the former extent of heathland vegetation, small remnants of which persist at Dunkeswell Turbary and North Hill. The freely draining land on the scarp with its dry, acid grasslands and woods, contrasts sharply with the perennially wet ground on the springlines. This supports wet woodlands, acid Rhôs pastures and other wet grasslands, with mire and bog communities in more restricted sites such as Hense Moor.

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<sup>9</sup> <http://jncc.defra.gov.uk/page-23>

## Management objective and policies

Objective BG	Policies
<p>To ensure effective conservation, enhancement, expansion and connectivity of habitats, forming coherent and resilient ecological networks across the Blackdown Hills and beyond, facilitating movement of priority species across the landscape</p>	<p>BG1 Take a strategic landscape-scale based approach to the creation, restoration and maintenance of habitats within the AONB (focussing on designated and undesignated priority sites) in order to ensure resilience to climate change and other pressures</p>
	<p>BG2 Connect habitats at a landscape scale and ensure permeability for species movement within coherent and resilient ecological networks</p>
	<p>BG3 Priority species (including Section 41, Devon Special Species, Protected Species) will be conserved. Targeted action will be taken to support the recovery of priority species</p>
	<p>BG4 Ensure sites of geological and geomorphological importance are appropriately managed to conserve their special features and reduce impacts of development</p>
	<p>BG5 Opportunities will be sought to maximise the benefits for wildlife and people from the positive management of all types of land including farmland, gardens, parks and community green spaces</p>
	<p>BG6 A strategic approach to the control, or eradication where feasible, of invasive non-native species will be taken where they threaten or damage local habitats and species and where action is practicable</p>
	<p>BG7 Increased recreational pressure will be resisted at locations where unacceptable damage or disturbance to vulnerable habitats or species is likely to arise</p>

## 4.4 Natural Capital and ecosystem goods and services

*Aim:* The air, land, soils and water of the Blackdown Hills are of a high quality, are sustainably managed and support healthy ecosystems. Flood and drought events are mitigated against via nature-based solutions. The impacts of climate change are understood, mitigated against and the low carbon economy is thriving

### Background

The water environment is fundamental to the character of the Blackdown Hills and has wider relevance:

- The plateau landscape dissected by long deep river valleys
- The source of the rivers Culm, Yarty and Otter within a small geographic area
- The steep scarp slope marks the watershed separating streams draining northwards to the Bristol Channel and south to the English Channel

Restoring a good quality and condition of the natural capital stock (land, soils, air and water) is the key to the outstanding environment of the Blackdown Hills, as well as delivering a range of multiple benefits and ecosystem services for society, including residents and visitors – as described in more detail in Chapter 3. Some of the rivers that rise in the Blackdown Hills provide domestic drinking water for both Devon and Somerset. The river Otter flows across the top of a large ground water aquifer and is a priority for improving water quality for drinking water through initiatives such as Upstream Thinking. South West Water and Wessex water are responsible for drinking water and waste water in the area.

Taking a catchment approach is vital as land management in the Blackdown Hills AONB affects areas downstream. A prime example of this is the effect that the river Culm has on the peak flows running through Exeter city, as the timing of the river Culm and river Exe peak flows align, leading to overtopping and flooding. Drought and low flows are also increasing due to our changing climate. Flood and drought are being exacerbated by climate change and implementing nature-based solutions by managing the natural resources of the Blackdown Hills (including mires that act as natural sponges and woodland planting in appropriate locations) that deliver multiple benefits by reducing and attenuating peak flows, maintaining low flows and trapping sediment is therefore vital.

Much of the wildlife interest of the AONB depends on water quality, the capacity of aquifers and on the rivers and their tributaries that rise in the Hills. Pollution and over-abstraction can have serious consequences. Surface water run-off can lead to soil erosion and flooding.

The Water Framework Directive<sup>10</sup> seeks to ensure clean water across Europe, looking at water management at a river-basin scale in order to achieve a good environmental status across all water bodies by 2027. In England the implementation is through a catchment-based approach, on the basis that many of the problems facing the water environment are best understood and tackled at a catchment scale. In the East Devon Catchment (the rivers Exe, Otter, Sid and Axe and their tributaries) no water bodies are currently at high or good status and are classified as either moderate or poor. There is also new legislation that affects farmers including the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018<sup>11</sup>

Pollution from rural areas is a significant factor in causing poor water quality in every catchment in the south west river basin district: phosphorus in rivers and sediment from agriculture are particular issues in the East Devon Catchment. Initiatives that offer practical solutions and targeted support to control pollution such as the Catchment Sensitive Farming programme<sup>12</sup> operate across the catchments which aim to control diffuse water pollution.

Parts of the eastern and western fringes of the AONB are within Nitrate Vulnerable Zones, where there are controls on some farming activities, particularly relating to manure and fertilisers, in order to tackle nitrate loss from agriculture.

The 2008 Climate Change Act committed the UK to reducing greenhouse gas emissions by 18% from 2008 levels by 2020 and 80% by 2050. In 2012, the AONB Partnership commissioned a research project to assess greenhouse gas emissions in the Blackdown Hills to provide a baseline assessment of which sectors are causing the most serious emissions and how patterns of emissions are likely to change over the coming years.

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<sup>10</sup> [http://ec.europa.eu/environment/water/water-framework/info/intro\\_en.htm](http://ec.europa.eu/environment/water/water-framework/info/intro_en.htm)

<sup>11</sup> <https://www.gov.uk/government/publications/farming-rules-for-water-in-england>

<sup>12</sup> [www.naturalengland.org.uk/csf](http://www.naturalengland.org.uk/csf)

**Management Objective and policies**

Objective NC	Policies
<p>To conserve and enhance the natural capital stock of the AONB and maximise the flow of ecosystem goods and services they provide</p>	<p>NC1 Promote a catchment, multiple-benefit, collaborative based approach to soil conservation, water quality and flood alleviation improvements utilising the Otter, Axe, Culm and Parrett/Tone catchments</p>
	<p>NC2 Improve land management in respect of the control of surface water run-off, to mitigate against flooding during more extreme weather events. Where appropriate within the landscape, seek to reinstate or improve the management of woodland, wetland and hedges to slow and store run-off</p>
	<p>NC3 Support studies, research and improve understanding of the AONB’s rich stock of natural capital and ensure that its value to society (in terms of flow of goods and services) is recognised and understood by decision-makers and others</p>
	<p>NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint</p>

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## 4.5 Farming, Forestry and Land Management

*Aim:* The 'Living Landscape' and Nature Recovery Network of the Blackdown Hills AONB is conserved and enhanced by sustainable and high nature value farming, forestry and land management enterprises. They are key providers of food, fuel and other public service benefits such as carbon storage

### Background

Farming is fundamental to the character of the Blackdown Hills, as today's landscape is testimony to the stewardship of generations of farmers and landowners. There is a tradition of small-scale family farms based on mixed livestock husbandry (beef and sheep) with associated forage crops such as grass silage.

In 2016<sup>13</sup>, there were 629 farm holdings in the AONB, predominantly grazing livestock (lowland) but also significant numbers of dairy farms plus a smaller number of cereal, pig, poultry and horticultural units. Some of the poultry units are very large. The majority of farms are less than 50 hectares in size. Such marginal<sup>14</sup> farming (due to topography, climate, distance from markets) and small farm size makes the agricultural and rural economy vulnerable to changes in land use policy.

Changes in land ownership and farming practices are influencing the landscape. Agriculture has faced considerable challenges in recent years such as disease (e.g. bovine TB), changes in support and reduced profitability. The number of small family farms are declining and there is an on-going trend towards the amalgamation of farm units and the separation of farmhouse from the land. Thus, farming is being concentrated on fewer, larger, sometimes dispersed units, while many farms are becoming essentially residential, for keeping horses or as small holdings. This risks not only reducing the opportunity for younger people to enter farming but also can lead to the countryside taking on a suburban appearance. However, new land managers can bring new opportunities and ideas that conserve and enhance the natural beauty. Contract labour is used more, often using larger vehicles and machinery and travelling between properties, which can have a wider landscape impact as these vehicles can easily damage the verges and banks of narrow Blackdown Hills lanes and lead to pressure to widen field gateways. The pattern of land management may also change as farmers seek new, profitable activities and markets. To boost profitability especially for dairy farms, there is a shift towards robotic milking, large livestock sheds and zero grazing (animals kept indoors all year). Forage crops that provide high protein/ high volume (such as maize) can be favoured that can result in more compacted soils, risk of runoff from bare soils on slopes and removal of permanent grassland. There is however now a greater awareness of the connection between land management and flood alleviation

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<sup>13</sup> 2016 Defra Agricultural Census data

<sup>14</sup> as opposed to upland

with soil health, crop selection and measures such as hedge reinstatement recognised ways of addressing the issue (see also section 4.4 and policy NC2). New crops for energy generation (such as anaerobic digestion) are also a driver for change, including maize while other land is used for recreation or tourism activities.

The Blackdown Hills Rough Grazing Association and the Farming and Woodland Group (facilitation fund) bring together farmers and landowners to work collaboratively to manage the important heritage features of the Blackdown Hills whilst maintaining farm viability, building farm resilience and supporting farm diversification. High nature value farming is encouraged through agri-environment schemes and the signs are that this will continue or even be strengthened through future support mechanisms.

Sustainable woodland management provides economic benefits and a range of ecosystem services including for wildlife and recreation, woodfuel and the storage of carbon. Many of the characteristic ancient broadleaved woods, which support priority species, were previously managed as coppice but are now undermanaged or have been planted with conifers. There is still such scope elsewhere to enhance the landscape and wildlife through restoration of Planted Ancient Woodland Sites (PAWS) and this will also provide increased opportunities for recreation, while still producing timber, wood fuel and other woodland products. Tree diseases pose an increasing and significant pressure on the natural beauty of the AONB, for example ash dieback especially where ash is a dominant tree in and outside woods and/or hedgerow component.

More productive forestry, including conifer crops where appropriate to the AONB landscape, has a role to play in sustaining economically viable landholdings that can continue to provide a wide range of ecosystem services.

The Blackdown Hills Woodland Association and Axe Woods have done much to encourage the cooperative management of smaller woodlands and there is considerable scope for continuing this work, including potential for reconnecting the supply chain, in local markets in particular. Community woodland schemes, such as Neroche Woodlanders, are encouraging new ways of working woods, as well as bringing a wide range of other benefits from wood fuel to health and wellbeing.

In a similar way the Blackdown Hills Hedge Association has promoted the traditional management of hedgerows through training courses, hedge-laying competitions and other events.

Orchards were a significant element of the Blackdown Hills landscape and are important for biodiversity especially where old trees survive. But most are no longer managed surviving only as a few old trees or have disappeared completely. With the increase in interest in local produce, apples, apple juice and cider are all being produced in the AONB. Furthermore, changing ownership of farms has caused a renewal of interest in restoring or replanting orchards on traditional sites with local varieties of fruit trees.

## Management Objective and policies

Objective FLM	Policies
<p>To support sustainable farming and forestry practices that conserve and enhance the special qualities of the AONB and deliver a range of ecosystem services</p>	<p>FLM1 A profitable, sustainable and environmentally beneficial farming and land management sector providing a range of public goods and services will be fostered as one of the principal means of maintaining the special qualities and distinctive landscape of the AONB</p>
	<p>FLM2 Encourage a high take-up of agri-environment schemes especially high quality environmental land management that help conserve and enhance the natural beauty through sustainable farming and forestry practices</p>
	<p>FLM3 Support will be sought for clusters of land managers who sustain land of exceptional landscape and nature conservation interest, in recognition of the value these systems provide to society</p>
	<p>FLM4 Encourage the production and marketing of local food and other agricultural products where these are compatible with the AONB designation.</p>
	<p>FLM5 Support and promote initiatives that encourage sensitive environmental management of field boundaries and hedgerow trees, woodlands, particularly those that conserve ancient woodland and veteran trees, orchards and restore the original broadleaved character of plantations on ancient woodland sites.</p>
	<p>FLM6 Give careful consideration to the landscape and visual impact of new woodland planting schemes</p>
	<p>FLM7 Control, mitigate and monitor damaging diseases such as ash dieback</p>
	<p>FLM8 Influence rural farm and rural business support mechanisms and act as a testbed for and monitor the impacts of agricultural policy reform on rural character</p>
	<p>FLM9 Wider community engagement with the farming and land management sector will enable a deeper understanding of the important role played by land managers in maintaining the AONB's special qualities</p>

# Theme 2: People

## Forces for Change - key issues, opportunities and challenges:

- Opportunities related to delivery of Defra's 25-year plan to improve the environment, including:
  - Recognition of value of natural environment for health and wellbeing
  - Cross sector working between health and environment
  - Nature based social prescribing
- Joined up promotion of existing public transport linking to walks, services and facilities
- Green infrastructure creating physical links with surrounding towns via footpaths or multi-user routes, opening up new recreation and tourism opportunities and potential links with nearby long distance recreational routes
- Managing recreational access to avoid damage to wet ground and steep areas
- Advances in communications technology offers greater potential to support business, education and provision of services
- Added value from local products, brand association and quality niche markets
- Impacts of local authority budget cuts, including rights of way, public and community transport, roads
- Urban expansion and housing development including major development proposals and plans for strategic allocations for urban extensions in the AONB setting, and managing associated noise, traffic and lighting
- High house prices, affordability and limited choice
- Increasing scale of agricultural development
- Decisions relating to the strategic road network (Road Investment Strategy), in particular A303/A30
- Increases in traffic volume and vehicle size
- Impacts of features such as pylons, masts, turbines and other alternative energy

## 4.6 Access and Enjoyment

*Aim:* Residents and visitors are able to appreciate and enjoy the tranquillity and other special qualities of the AONB, gaining inspiration and a sense of wellbeing through a range of quiet leisure activities. The public rights of way network is maintained and managed to meet the needs of all users.

### Background

Access to the countryside and engagement with a high quality natural environment make an important contribution to physical and mental health and wellbeing. The Somerset AONBs Nature and Wellbeing project has been supporting mental wellbeing and physical activity, working with specific groups and individuals who may benefit from such engagement. The aim has been to tackle some of the barriers that prevent people from experiencing the health and wellbeing benefits that the AONBs can offer.

Within the AONB there is a balance to be struck in providing for recreational activities in a way that is consistent with conserving natural beauty and without damaging the environment and tranquillity people come to enjoy, while also recognising that it is a working environment with much of the land in agriculture and in private ownership. Near several market towns and within easy of larger centres such as Exeter and Taunton, the Blackdown Hills offer a range of opportunities for recreation. Walking, cycling and horse riding are popular, but many people come to the area for activities as diverse as sky-diving, gliding, motor sports and bushcraft.

The public rights of way (PRoW) network in the AONB is extensive (429 km) but fragmented, with limited off-road routes for horse riders and cyclists. The local road network provides other opportunities but the twisting, narrow lanes raise safety concerns for walkers, cyclists and horse riders and the terrain can be challenging for casual cyclists. The AONB Partnership has published some circular walks and rides guides, including on-road cycle routes. There is further scope to develop safer routes for horse riders and cyclists within the AONB, multi-user routes and all-ability access, for example short routes around villages, and to signpost suitable routes between surrounding settlements and the Blackdown Hills. Green infrastructure provision offers an opportunity to create physical links with surrounding towns via footpaths or multi-user routes, opening up new recreation and tourism opportunities. There is also potential to improve linkages with nearby long distance recreational routes such as the Stop Line Way.

Opportunities for access to 'open countryside' on foot is relatively limited in the area, although the Public Forest Estate adds to the extent of open access land, which totals 641 ha. The majority of the open access sites are registered commons, in some cases also SSSIs or local wildlife sites. Other sites with public access include National Trust land and Wildlife Trust reserves.

The county councils have Rights of Way Improvement Plans (RoWIPs) for their networks that reflect the modern patterns of demand and land use. They identify how the PRow network will be managed to meet the needs of all users. Each county has committed and active Local Access Forums that bring all interested parties together to improve opportunities and promote responsible access to the countryside for recreation and enjoyment.

### Management Objective and policies

Objective AE	Policies
<p>To ensure that opportunities to explore and enjoy the Blackdown Hills countryside and special qualities are compatible with conserving and enhancing natural beauty.</p>	<p>AE1 Take a co-ordinated, strategic and planned approach to the management of public rights of way and publicly accessible land to achieve an accessible, well-connected network that conserves and enhances the special qualities of the AONB, avoids impact on sensitive sites and minimises conflict between different interests.</p>
	<p>AE2 Opportunities will be sought to extend and improve the rights of way network, including improving connections with surrounding settlements where this is compatible with conserving and enhancing natural beauty.</p>
	<p>AE3 Opportunities to use the Blackdown Hills AONB to benefit the health and well-being of residents and visitors will be sought and promoted, seeking a range of sensitive and sustainable access opportunities for users of all abilities to enjoy the special qualities of the AONB.</p>

## 4.7 Planning and development

*Aim:* All planning policies, strategies and decisions recognise and give great weight to the purposes of AONB designation as a nationally valued landscape, all development is in harmony with the landscape and in keeping with the strong local architectural style of the Blackdown Hills. New buildings are designed and built to the highest sustainable standards and affordable housing is available where needed.

### Background

Villages, hamlets, individual buildings and their settings form a vital element of the character of the Blackdown Hills. The planning and design of development, both within the AONB and around it, is of key importance in maintaining the landscape and scenic beauty of the area. Decision-making is the responsibility of the local planning authorities within the context of the National Planning Policy Framework (NPPF) and local development plans, including Neighbourhood Plans. All local authorities also have a duty of regard to AONB purposes of conserving and enhancing natural beauty.

#### National Planning Policy Framework and planning considerations

The NPPF provides specific planning guidance for plan-makers and decision-takers in relation to AONBs. A revised NPPF was published in July 2018 and includes redrafting of paragraphs 115 and 116 (the main references to AONBs) as the revised paragraph 172. The revision confirms that AONBs [and National Parks] have the highest level of protection in the planning process and that great weight should be given to conserving and enhancing their landscape and scenic beauty. It adds that the scale and extent of development in AONBs should be limited, alongside retaining the policy that permission for major development should be refused in these areas other than in exceptional circumstances and where it can be demonstrated that it is in the public interest. Time and practice will reveal how this redrafting of controls on development in AONBs will address the growing pressure for development in protected areas like the Blackdown Hills.

The NPPF also references the importance of high standards of design and materials that reflect the identity of the local built and natural environment. The avoidance and reduction of noise and light pollution is addressed with references to protecting tranquil areas and intrinsically dark landscapes - special qualities of the AONB. Sustainable construction methods offer the potential to reduce the wider environmental impacts; this includes advocating sustainable drainage systems (SuDS), a natural approach to managing drainage in and around development. In the AONB, where possible, new developments should incorporate sustainable technology, renewable energy sources, and energy and water efficiency as standard; the use of locally sourced materials should be encouraged. However, this needs to be balanced with retaining a locally distinctive built environment with a strong local vernacular. There may also be implications related to sourcing local materials, for example extracting building stone.

As evidenced in neighbourhood plans and similar, meeting local housing needs should be the priority for new housing developments in the AONB. The availability of a range of affordable housing (see NPPF Annex 2: Glossary), and other more affordable options, is a high priority for many local communities due to the limited choice of accommodation available and lack of affordability. Some have established Community Land Trusts to address provision. Whether on an exceptions site or part of a larger site, such development should pay full regard to conserving and enhancing natural beauty.

#### Major development

The NPPF does not define the meaning of the phrase ‘major development’ in respect of protected landscapes and there is no single threshold or factor that determines whether a proposal is major development for the purposes of paragraph 172. Assessing whether a proposed development is a major development is a matter of judgment for the local planning authority, based on an assessment of all the circumstances. What is clear from the case law and Planning Inspectorate decisions (made with reference to paragraphs 115 and 116 of the 2012 NPPF) is that the determination as to whether a development is major development or not, is to be considered in the policy context of those relevant paragraphs - the intent of which is to conserve landscape and scenic beauty in AONBs. As such, the potential for harm to the AONB should be foremost to the determination of whether development is major or not. This requires consideration of a range of site and development specific factors that include (but are not limited to) location, setting, quantum of development, duration, permanence or reversibility of effects. Harm to the Blackdown Hills AONB is any impact which causes loss, damage or detriment to its natural beauty, its special qualities or its distinctive characteristics or to the perception of natural beauty. **Appendix B** provides further information on the consideration of ‘major development’.

#### Role of the management plan

The Management Plan provides supporting evidence and complementary policy guidance for local plans and can be referenced to inform development proposals and decisions. The Management Plan is supplemented by topic-specific guidance, such as the AONB’s *Design guide for houses*, *What makes a view?* and *Good lighting guide*. It is expected that further design/planning guidance will be prepared during the life of this plan. The plan aims to promote consistency and co-operation between local planning authorities, both in setting policy and dealing with planning applications within the AONB, to conserve and enhance natural beauty across the area. AONB Management Plans can be a material consideration in planning decisions. Complementing the plan is the Devon landscape character assessment which provides key landscape evidence and guidance to inform policy and decision making.

#### Considering natural beauty

It is important that impacts on the AONB designation are properly recognised and accounted for in decision making. In an AONB like the Blackdown Hills where timelessness and escape from the modern world is written into the core qualities underpinning the designation, some degree of harm will inevitably occur as a result of development and needs to be explicitly recognised and assessed. The Management Plan and supporting documents should help planning authorities, developers and land/home owners understand the landscape’s capacity for change and

assess impact. Mitigation is a response to harm, a way of ameliorating but not eliminating impact, and should not be a justification for allowing inappropriate development. A clear understanding of the AONB's special qualities and distinctive characteristics will help to develop proposals which avoid or minimise harm.

The special qualities and defining characteristics of the Blackdown Hills AONB predominantly relate to the distinctive nature of the farmed landscape; the mosaic of land use types and hedges, and the isolated, dispersed type of development much of it driven by the topography of the area, which in turn is a product of the unique geology. Much of the appeal of the AONB stems from the relatively low level of 'modern' development. Essentially what we are considering in the Blackdown Hills are large tracts of an intact historic/cultural farmed landscape. The challenge therefore is to seek a sustainable approach to development that respects this inherent character and landscape assets whilst also fostering the social and economic wellbeing of local communities.

#### Informing sustainable development

The layout, form and density of all new developments needs to reflect the historic rural grain of the AONB. It is important that all new development, especially housing development, is of a scale and layout that conserves and enhances the distinctive pattern of built form found across the Blackdown Hills, specifically a low density, dispersed pattern of development.

Location and context are important; development should respect the importance of the setting of the AONB, of individual settlements, hamlets and historic farmsteads, maintaining the existing pattern of fields and lanes, the integrity of the hedgerows as well as open agricultural vistas, and enhance sense of place.

Development proposals in or affecting the AONB should avoid sensitive locations that will impact on the special qualities of the AONB – notably views – including prominent locations on the northern scarp slope, on skylines and hilltops, the open plateaux and ridgelines, and undeveloped valley slopes. Attention should be given to noise and activity arising from developments together with lighting to avoid having an adverse impact on the area's tranquillity and dark skies.

The sense of place is easily lost: suburbanisation and the cumulative effect of 'permitted development' break down local distinctiveness; replacing small-scale, locally distinct features with ones of a standard design erodes local character – for example the choice and style of gate, fence, wall or hedge around a house, or pavements, kerbs and driveways in new development.

In more rural areas of the AONB, agricultural buildings and development are significant issues and can be detrimental to natural beauty if not handled sensitively. As some agricultural practices continue to intensify and with an increasing awareness of animal welfare, the demand for modern large-scale agricultural buildings is continuing. To comply with environmental regulations comes large-scale slurry storage facilities

often in isolated and elevated locations with associated landscape and visual impacts, and the enclosure of open yards, often infilling the gaps between existing structures resulting in the visual massing of buildings.

**Appendix A** supports this section by providing a checklist for development proposals to help demonstrate how the proposal responds positively to the AONB designation.

**Management Objective and policies**

Objective PD	Policies
<p>To conserve and enhance the natural beauty of the Blackdown Hills by ensuring that all development affecting the AONB is of the highest quality, sensitive to landscape setting and conserves its wildlife, historic character and other special qualities.</p>	<p>PD1 All relevant local and neighbourhood plan documents and planning decision-making will have regard to the AONB purpose, the management plan and other AONB statements and guidance, and ensure that conserving and enhancing the special qualities of the AONB is given great weight.</p>
	<p>PD2 All necessary development affecting the AONB will conserve and enhance natural beauty and special qualities by:</p> <ul style="list-style-type: none"> <li>• Respecting landscape character, settlement patterns and local character of the built environment,</li> <li>• Being sensitively sited and of appropriate scale,</li> <li>• Reinforcing local distinctiveness, and</li> <li>• Seeking to protect and enhance natural features and biodiversity</li> </ul>
	<p>PD3 Support measures to improve energy efficiency and resource use and support appropriate small scale renewable energy schemes that do not detract from historic character or visual amenity, and do not conflict with the special qualities of the AONB or the conservation of natural beauty.</p>
	<p>PD4 Support the provision of affordable housing to meet identified local needs in locations with access to employment and local services, ensuring that developments are appropriately scaled and sited to respect landscape and settlement character, and avoiding impacts on nature conservation and historic interests.</p>

## 4.8 Transport and highways

*Aim:* Sustainable transport options are available in the area and used as an alternative to the private car, benefitting the tranquillity and natural environment of the AONB as well as local communities and visitors. The road network is maintained and in keeping with the unspoilt rural landscape of the AONB.

### Background

Inevitably most people in rural areas need a car to access employment, services and other opportunities. 94% of households in the Blackdown Hills have at least one car (Census 2011). Nevertheless, reduction of unnecessary car use will contribute to both quality of life and conservation of the area's natural beauty. Much of the road network is made up of rural roads and lanes, not built or maintained for the volume, traffic size and use which they now must sustain. Devon County Council and Somerset County Council, as the highway authority, are responsible for the repair and maintenance of most roads in the AONB. Budget cuts will continue to affect their ability to effectively manage and maintain the rural road network and support bus services.

Highways England looks after the M5 and A35 trunk road, both which partly bound the Blackdown Hills, and the A303/A30 which passes through the middle of the AONB. Other major roads on the periphery are the A373 and A358, which are not part of the national strategic network, and are looked after by the respective county council.

Alterations or improvements to any of the above routes could have an impact on the special qualities and setting of the AONB, and affect local communities. Full consideration of the environmental and landscape impacts would be required as part of the feasibility and scheme development. Highway authorities and Highways England have a duty of regard to AONB purposes in carrying out their functions. Other strategic decisions regarding road and rail resilience in the South West could in the longer term also have implications for traffic and transport in the AONB, for example, improvements and upgrades to rail lines could shift passenger and freight traffic off the major roads.

Traffic speed and volume are a real concern in many communities. Routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment. Although necessary, lorries and other large vehicles travelling to and from farms and small businesses along narrow lanes cause noise, risk to other users and damage to the roads, verges and hedgebanks. Traffic and transport is a focus topic for the Blackdown Hills Parish Network, who have been trying to secure cross-boundary co-operation on managing HGV traffic and work with the highways authorities to identify and tackle the issues.

The availability of public transport is limited in the AONB, and has seen reductions in services in recent times, which can leave those without access to a car at a serious disadvantage. Where there are bus services, they can be expensive, infrequent and do not operate at off-peak times. Nevertheless, certain routes that cross the area could provide better opportunities for tourism and recreation. In some places voluntary community transport schemes provide a valuable service, and could be used more. Rail services can be accessed at the nearby towns of Taunton, Tiverton, Honiton and Axminster. As noted in Section 4.6 there would be benefits to developing safer routes for non-motorised road users (including pedestrians and cyclists) within the AONB, and to 'signpost' suitable routes between surrounding settlements and the Blackdown Hills. This would help move towards creating places less dominated by motor vehicles and more welcoming for people - environmental benefits include cleaner air less greenhouse gas emissions and reduced congestion, social benefits include better physical and mental health and more equitable access to the AONB for visitors whether or not they are car-owners.

Both county councils have an approach of reducing unnecessary road signage where possible, which will have a positive impact on the landscape. However, loss of traditional roadside features, like fingerposts and milestones, and urbanising changes to the road corridor and streetscape of villages, are detrimental to the AONB's local character and distinctiveness.

### Management Objective and policies

Objective TH	Policies
<p>To ensure that the impact on the landscape, environment and enjoyment of the AONB is considered in the planning, provision and management of transport networks and services.</p>	<p>TH1 Road and transport schemes (including design, maintenance, signage, landscaping and safety measures) affecting the AONB will be undertaken in a manner that is sensitive and appropriate to landscape character, having regard to the purpose of AONB designation and conserving and enhancing the area's special qualities. The landscape and cultural features of the AONB's road network (including hedge banks, flower-rich verges, and locally distinctive historic highway furniture) will be protected and conserved</p>
	<p>TH2 Traffic management measures will be supported which reduce the impact of large and heavy vehicles on the most minor roads and help to provide a safer environment for walking, cycling and horse riding, where this is compatible with conserving and enhancing natural beauty.</p>
	<p>TH3 Promote the development of high quality, integrated and sustainable transport services and initiatives in and around the AONB where they can be achieved without compromising the conservation of natural beauty and local character.</p>

## 4.9 Rural economy and tourism

*Aim:* A thriving and diverse Blackdown Hills economy provides jobs for local people, makes wise use of local resources and benefits local communities while conserving and enhancing the outstanding landscape.

### Background

The high quality landscape has an integral part to play in sustaining economic growth, generating income, local jobs and products<sup>15</sup>. The key is for these aspirations to be consistent with the area's unique qualities.

The area is typically characterised by high numbers of small and micro enterprises and a high level of self-employment. Many of those who have established small businesses were attracted to the area by the high quality of life provided by the AONB environment. There is however still a strong agricultural sector; in 2011 accounting for 40% of businesses. Since 2014, £4.4 million has been brought into the AONB through agri-environment payments.

There is a common desire to develop a diverse and resilient local economy that is not over reliant on one particular sector, particularly one that could be heavily affected by external factors, such as agriculture and tourism for example. One of the implications of this, therefore, is a need to identify and support the training and development of new skills required to meet the needs of local employers and take advantage of new economic opportunities. The Blackdown Hills are not a self-contained economic area being heavily influenced by the surrounding market towns and larger settlements of Exeter and Taunton. These towns are inextricably linked with their rural hinterlands, both culturally and economically, providing opportunities and potential markets that can benefit small businesses within the area.

There is considerable local experience of the collaborative LEADER approach to rural development, with successful programmes operating in the AONB since 2002 seeking to strengthen the connections between the business sector, local services and markets, local employment opportunities and landscape management.

The Blackdown Hills Business Association (BHBA) aims to promote the interests of all businesses in the Blackdown Hills area. It is a not-for-profit membership-based organisation which was set up in the early 1980s to bring together small businesses for mutual support and promotion. This principle remains the core of the BHBA's activities today.

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<sup>15</sup> See for example [www.heartofswlep.co.uk](http://www.heartofswlep.co.uk) and [www.naturaldevon.org.uk](http://www.naturaldevon.org.uk)

Tourism in the AONB is largely characterised by high quality accommodation and quiet countryside pursuits and it is well established that there is a balance to be struck between realising the economic benefits of tourism and conserving the environmental wealth that is the attraction to visitors. The desire is to encourage and develop a tourism offer that is linked to local products and services that do not compromise the landscape and environment. This would bring benefits by encouraging visitors to explore the area; increasing their understanding and enjoyment, lengthening their stay and increasing the income for local businesses from both day and staying visitors. There is potential to improve the links between attractions, events and places, and to establish links with other more recognised tourist areas, for example the East Devon coast.

Rapidly evolving technology around modern communications enables new economic opportunities and ways of working that have a minimal environmental impact, as well as enabling rural businesses to link up for promotion and co-operation. The Government wants to see nationwide full fibre broadband coverage by 2033, and to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2027<sup>16</sup>. Therefore it is important to ensure that the Blackdown Hills are well placed to take advantage of this technological revolution and not disadvantaged by poor communications infrastructure, in particular the availability and roll out of high speed (super- and ultra-fast) broadband. That said, broadband and mobile phone infrastructure needs to be sensitively sited and located within the AONB.

### Management Objective and policies

Objective RET	Policies
To sustain a local economy that makes wise use of the resources of the AONB and conserves and enhances the natural beauty of the Blackdown Hills	RET1 Support the principle of local markets and sustainable local products where it adds value to the local economy without compromising the conservation and enhancement of natural beauty and the special qualities of the AONB.
	RET2 Economic capacity, employment and skills in the area will be supported through training opportunities, community enterprise, business networking and cooperation especially where these assist businesses to contribute to AONB purposes
	RET3 Tourism and recreation provision will contribute to the local economy without harming the Blackdown Hills landscape, historic environment, biodiversity or tranquillity, and respecting the special qualities of the AONB.
	RET4 Support efforts to secure and improve superfast broadband and mobile phone coverage in the AONB without adversely affecting special qualities.

<sup>16</sup> [www.gov.uk/government/publications/future-telecoms-infrastructure-review](http://www.gov.uk/government/publications/future-telecoms-infrastructure-review)

## 4.10 Community and culture

*Aim:* The Blackdown Hills is home to flourishing communities, with a cohesive and diverse population who can access a range of services and facilities. The commitment of local people helps to conserve and enhance the environment and landscape of the AONB, maintaining the distinctive character of villages and countryside.

### Background

Residents within the AONB identify strongly with the area and readily describe themselves as living in the Blackdown Hills rather than acknowledging administrative boundaries. There is a strong sense of the timelessness and traditions, expressed through community activities and events, arts, crafts and trades. Although sparsely populated (about 36 per square kilometre) with small settlements – the two largest are Dunkeswell and Hemyock, each with a population of some 2,000 – most are active communities with many social and interest groups and events, centred around parish halls, community centres, churches, schools and pubs.

The landscape of the AONB has in the past been an inspiration to artists and writers, and the present day Blackdown Hills artisans keep this tradition alive, strengthening the cultural associations with the landscape.

There is a particularly strong collaborative spirit among like-minded people in the area. The Blackdown Hills Business Association and Blackdown Hills Hedge Association are long established networks, but also more recent groups include a diversity of interests such as the Blackdown Hills Artists and Makers, Blackdown Hills Transition and Blackdown and East Devon Woodland Association.

Parish councils in the AONB form a collective voice through the Blackdown Hills Parish Network. The parish network produced a community plan in 2011<sup>17</sup> that pulled together social and economic information about the area and identified shared priority issues among local communities. The focus of the network is on finding ways to collectively address some of these issues.

There is a long community planning history, with many villages having produced parish plans and village design statements to inform planning and other decisions, and some now have adopted neighbourhood plans to influence decisions. Many communities have also produced village guides, walks leaflets and organised heritage and environmental projects.

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<sup>17</sup> <https://blackdownsonline.org.uk/parish-network/>

Access to services and facilities such as health, libraries, education, childcare and shopping varies considerably but is generally limited, as might be expected in a rural area. While village shops and post offices are invaluable community assets, maintaining their long-term viability remains a real issue whether commercially- or community-run. In common with the rest of Devon and Somerset the population age profile is older than the national average; the combination of an ageing population, sparse numbers and limited local facilities brings challenges to ensuring ongoing wellbeing. There is no getting away from the fact that improved digital connectivity will continue to revolutionise quality of life, from how we work and how children learn, to how we spend our leisure time, shop, and engage with health and public services. It is therefore important to ensure that communities in the Blackdown Hills are not disadvantaged by poor broadband speeds and mobile coverage (see also Section 4.9 and policy RET4).

### Management Objective and policies

Objective CC	Policies
To foster vibrant, healthy and resilient communities who enjoy a high quality of life and feel connected to the AONB and its special qualities	CC1 Local communities will be supported to identify, plan, and provide for their own needs, in undertaking community activities to encourage sustainable lifestyles, reinforce local cultural traditions, and in celebrating their achievements and strengths.
	CC2 Community-led planning tools (neighbourhood plans, parish plans, village design statements and others) that contribute to conserving and enhancing the AONB will be supported.
	CC3 Support and promote initiatives that help to provide, retain or enhance community facilities and services where compatible with conserving and enhancing natural beauty.
	CC4 Support local community engagement in cultural and natural heritage initiatives within the AONB.

# Theme 3: Partnership and Promotion

## Forces for Change - key issues, opportunities and challenges:

- Opportunities through delivery of Defra's 25-year plan to improve the environment, including:
  - Getting children close to nature
  - Encouraging volunteering
- AONB Partnership's strong track record in managing collaborative projects and community engagement
- Engagement with education providers (all ages)
- Harnessing and developing volunteer support and community involvement
- Social media and new digital technology
- Political and policy change and uncertainty, e.g. post-Brexit and outcome of Glover review of protected landscapes
- Local government transformation and budget cuts
- Financial pressures; reduced resources and capacity to deliver
- Increasingly competitive nature of external grant programmes
- Lack of current data specific to the AONB and regular monitoring

## 4.11 Communication, education and awareness

*Aim:* The significance of the AONB designation is well understood and widely appreciated. Local people, visitors and decision-makers are actively involved in caring for the countryside and heritage of the Blackdown Hills and there are diverse opportunities for enjoyment and learning.

### Background

The continued protection and enhancement of the Blackdown Hills' landscape, biodiversity and historic assets can only be achieved by successful communication of their value, with the ultimate aim to influence behaviour and ensure that the significance of the Blackdown Hills AONB is widely understood and valued among a variety of audiences. This may involve:

- Equipping audiences with high quality, targeted information and interpretation resources
- Enabling outdoor learning and enjoyment to suit many different ages, interests and needs
- Creating opportunities for people to contribute knowledge, time and labour

One of the specific roles of the AONB Partnership is to communicate the purpose of designation, and to promote awareness of the AONB and its special qualities. The main tools available to the AONB Partnership in carrying out this work are:

- Outdoor events and activities
- Volunteering opportunities
- Curriculum-related activities with local schools
- Social networking and media presence
- Online and print information
- On-site interpretation, both static and live

Communicating AONB key messages consistently and in varied media helps to establish the AONB vision in the minds of the local community, surrounding populations and regular visitors. It is important to appeal to the range of audiences who are familiar with the area as well as informing and empowering less familiar audiences.

As well as being the central public point of communication about the Blackdown Hills, the AONB team facilitates communication between the member organisations of the Partnership.

## Management Objective and policies

Objective CEA	Policies
To promote a greater understanding, appreciation and enjoyment of the Blackdown Hills AONB and wider recognition of the designation and its purpose.	CEA1 Through promotion and education make more people aware of what makes the Blackdown Hills special, inspiring them to help care for the area and contribute to its conservation and enhancement.
	CEA2 Develop and support a range of opportunities for active engagement with the countryside, wildlife and heritage of the Blackdown Hills AONB, promoting the benefits that the natural environment provides to us.

## 4.12 Partnership and management

*Aim:* All AONB Partnership organisations work together to conserve and enhance the natural beauty of the Blackdown Hills while also enabling, supporting and sustaining local communities and businesses.

### Background

The AONB Partnership is made up of organisations and interest groups that work together towards achieving the AONB vision through delivering the aims, objectives and policies of the Management Plan. Policy direction and implementation of the Management Plan is guided by the Partnership Management Group. This is comprised of appointed representatives from the local authorities and a number of representatives elected from the statutory and non-statutory organisations, local groups and parish councils within the AONB.

The AONB Partnership is supported by a core staff team of two full-time and two part-time posts. The AONB manager is supported by an Officer Support Group, consisting of officers from the local authority funding partners and the AONB chairman, who advise on technical issues such as resources and staff. To co-ordinate action and help to deliver projects that conserve and enhance the AONB it is enormously valuable that the Partnership can call on topic-specific working groups or forums drawn from the local community, interest groups, businesses, and the statutory and non-statutory agencies.

In recognition that the Blackdown Hills AONB is a nationally important landscape the majority of AONB funding comes from Defra. Core funding, which maintains the staff team and services of the Partnership, is matched by the six local authority partners in the proportion 75% Defra: 25% local authorities. Other Defra funding is allocated to projects; it is used by the team to draw down match from a variety of sources to co-ordinate and deliver projects and other initiatives. It also provides a grant pot, the Sustainable Development Fund (SDF), to which organisations and individuals can apply to deliver sustainable initiatives throughout the AONB.

Many organisations and agencies such as Natural England, the Forestry Commission, DEFRA and the National Trust contribute to delivering the Management Plan, through policies affecting land management, heritage protection and public access and the need for partnership funding and support. Local authorities at county, district and parish level continue to have a major role, including active involvement in the management, financial and officer support for the AONB Service, co-ordination of policies and plans across the AONB, and involvement in projects implementing the plan.

Protected landscapes in the south west, including the two national parks, meet regularly to work collaboratively and learn from best practice. Joint working between the AONBs in Devon, particularly with the adjoining East Devon AONB, is supported and encouraged. Also, recent

years have seen successful collaboration with the Quantock and Mendip Hills AONBs in Somerset on nature and wellbeing, volunteer co-ordination and planning.

The National Association for AONBs (NAAONB) is a charity that provides a strong collective voice for the UK's 46 AONBs. Its objectives are to

- promote the conservation and enhancement of AONBs,
- advance the education, understanding and appreciation by the public of AONBs, and
- promote the efficiency and effectiveness of those promoting or representing AONBs, other protected areas and those areas for which designation might be pursued.

It does this by taking a collaborative and partnership-based approach to working at a national level to achieve shared goals. It provides a focus for exchanging information, promoting best practice and raising awareness of AONB issues with national decision-makers.

The Blackdown Hills AONB Partnership also works with a range of other partnerships, such as the Devon and Somerset Local Nature Partnerships, East Devon Catchment Partnership and Devon Landscape Policy Group, to streamline overlapping activities and explore areas where joint working would be beneficial.

### Management Objective and policies

Objective PM	Policies
To ensure that the special qualities of the AONB are better understood, valued, conserved and enhanced through an effective AONB Partnership	PM1 Encourage co-ordination and partnership amongst the wide range of national, regional and local agencies and organisations to secure funding for the care and enhancement of the AONB
	PM2 Promote and highlight good practice within the AONB and the role and activities of the AONB Partnership
	PM3 Monitor the state of the landscape to identify where erosion and enhancement of the quality of the AONB is taking place and develop feedback mechanisms for corrective management

## CHAPTER 5: Delivery

*Aim: A landscape conserved and enhanced into the future, rich in natural/ historic/ cultural capital, understood and cared for by the community and providing services that people value*

### 5.1 Implementation

Collaboration and working together with others to achieve success underscores all AONB Partnership work.

All those that have an active interest and role in the management of the Blackdown Hills landscape and in supporting the communities that live and work within it have a role in implementing the Management Plan through individual action as well as partnership working. This includes parish councils, landowners and managers, voluntary organisations and interest groups, local authorities, statutory agencies, advisory bodies and government departments – whether individually or as part of other partnerships. The need and importance of partnership working and community engagement has never been greater. New and innovative working relationships will be needed to deliver the priorities of the Management Plan and draw down new sources of funding that may become available.

By helping to implement this plan, government, local authorities, public bodies and other ‘relevant authorities’ will be contributing to their ‘Section 85’ duty to have regard to the purpose of conserving and enhancing the natural beauty of the Blackdown Hills AONB (see appendix C). It is therefore important that the strategies, plans and action plans of key local, regional and national authorities, agencies and organisations take account of and reflect the vision, objectives and policies of this plan.

A key function of this plan is to encourage co-ordinated action in the Blackdown Hills and ensure an integrated policy context. Sitting as it does across four districts and two counties, activities in the Blackdown Hills are often delivered by several different organisations – or different parts of the same organisation – based on administrative boundaries. This can lead to local issues being marginalised, different approaches being taken in neighbouring areas, and divergence of policy, for instance.

As such, one of the most important roles of the Blackdown Hills AONB Partnership, supported by other AONB-wide groups such as the Parish Network and Business Association, is to co-ordinate information and facilitate action across administrative boundaries to ensure that organisations collectively can meet the needs of the environment, landscape and communities of the Blackdown Hills. This will support local authorities and other public bodies in their ‘duty to co-operate’, and help to develop integrated, effective collaboration at a landscape-scale through, for example, the Local Nature Partnerships and Catchment Partnerships.

The AONB Partnership, both directly through the work co-ordinated by the AONB staff team and through its member organisations, will seek to achieve the vision for the AONB in the following ways:

- educating, communicating, advising and informing
- improving understanding of the AONB and the value of the designation
- providing leadership and co-ordination of the work of others locally
- using this plan to influence and inform decision making
- encouraging others to put the wellbeing of the AONB at the core of their strategies, plans and actions
- working jointly with the National Association for AONBs
- undertaking project work
- securing new grants and funding
- developing partnerships and co-operative programmes
- commissioning research and survey programmes to aid evidence-based decision making

Partner organisations may also:

- allocate grants and funding streams
- lobby for change at local, regional, national and international level
- exercise statutory and regulatory functions, such as local authority planning and development management, or Environment Agency pollution control

## **5.2 Monitoring and evaluation**

We can only achieve the AONB purpose of conserving and enhancing the Blackdown Hills' natural beauty and promote understanding and enjoyment of the special qualities if we understand what makes the area special, the issues and challenges facing those special qualities, and the opportunities for celebrating, conserving and enhancing them, and telling their stories.

We also need to ensure that decisions are made based on the best available evidence so that we can make the most of the funding and resources available. It is therefore important to ensure that there are adequate mechanisms in place for monitoring, research and reporting.

A role of the Blackdown Hills AONB Partnership is to monitor and evaluate the actions that happen as a result of the implementation of this plan to demonstrate where management actions are making a difference on the ground - but without the monitoring process being overly burdensome.

**Qualitative monitoring** of action is relatively straightforward; partners regularly report to the AONB Partnership Management Group. This is the opportunity to highlight the work they are doing throughout the year. In addition, the AONB Partnership Annual Review is the mechanism for reporting on implementing the Management Plan and the AONB website highlights a range of project work.

Over the last plan period Natural England oversaw a national **framework for monitoring environmental outcomes in protected landscapes** which provided a consistent annual data set to help guide future management and this provided a body of supporting evidence for this plan. At the time of writing it is likely that Natural England will not be able to continue to collate and provide the data for all English AONBs and National Parks in the same way, and an alternative mechanism for securing relevant data will need to be explored.

The AONB family are working with Defra to produce a set of high-level **key performance indicators** (KPIs) that can be used to measure performance and outcomes. These have not yet been finalised, but the headlines are as follows:

1. Hectares of land enhanced for natural beauty through the work of AONB Teams
2. Number of heritage assets where the Condition or setting has been improved by the work of AONB Teams
3. Number of people engaged through the work of AONB Teams
4. Number of partnerships (e.g. steering groups, research projects) where the AONB Team promotes the delivery of the Management Plan
5. Number of Strategies or development schemes appraised by AONB Teams for compliance with the AONB Management Plan
6. Total value of work delivered directly or secured by the work of AONB Teams

A series of further indicators are also being developed that will sit under each of these headlines to add depth and may be more locally tailored.

### 5.3 Strategic Delivery Plan

The table on the following pages outlines strategic actions and associated delivery mechanisms for the next 5 years, necessary to deliver the ambitions of this plan. Focusing on outcomes and the strategic level rather than specific and detailed actions reflects uncertainty (spending review, Glover review, impact of Brexit, etc), but the approach is also intended to highlight opportunities to all relevant organisations, groups and others on ways they can contribute to managing the Blackdown Hills AONB. The annual AONB Partnership Business Plan will specify the expected roles for partners in more detail in relation to workstreams and specific projects.

There is a flow across the table, rather than a direct read across; in terms of the connections the table can be interpreted as follows:

*Objectives* – what we want to achieve within a specific topic area

*Outcomes* – what we want things to be like in the AONB as a result of implementing the management plan

*High Level Actions* – the core strategic actions required to be able to achieve the outcomes

*Partnership Delivery* – what organisations can do to contribute to delivery of the strategic actions.

Blackdown Hills AONB Partnership 5-year Strategic Delivery Plan (2019-2024)					
Plan	Objectives	Outcomes (being sought as a result of delivering the objectives)	High Level Actions which need to be developed and supported	Partnership Delivery	Monitoring ( Key Performance Indicators or KPI's)
		<p>LC To ensure that the distinctive character and qualities of the Blackdown Hills landscape are understood, conserved, enhanced and restored</p> <p>CH To ensure effective conservation and management of the Blackdown Hills historic environment, including historic buildings, archaeological sites and heritage landscapes</p> <p>BG To ensure the conservation, enhancement, expansion and connectivity of habitats, forming coherent and resilient ecological networks across the Blackdown Hills and beyond, facilitating movement of priority species across the landscape</p> <p>NC To conserve and enhance the natural capital assets of the AONB and maximise the ecosystem goods and services they provide</p>	<p>There is a resilient landscape, richer in wildlife</p> <p>Natural and cultural heritage assets are in a good condition</p> <p>Our natural and cultural heritage assets are valued for their own sake and all that they provide for us</p> <p>Communities are at a reduced risk of flooding and water quality is improved through co-created catchment solutions</p> <p>Farming and land management are economically viable while conserving and enhancing natural beauty</p>	<p>Build a robust evidence base</p> <p>Restore coherent and resilient ecological networks (i.e. wildlife corridors)</p> <p>Promote and co-create catchment-based approaches including nature based solutions</p> <p>Develop landscape scale projects (respecting landscape character), especially those promoting greater collaboration across sectors</p> <p>Quantify natural capital assets and enable the value to society to be measured</p>	<p>Fully understand the state of the AONB (including genetic diversity) and geodiversity resource</p> <p>Recording, consolidating and conserving built/ other cultural heritage features and increasing knowledge and understanding of the natural and historic environment</p> <p>Reverse the decline in biodiversity, focussing on priority habitats and species</p> <p>Take a catchment based &amp; climate change adaptation approach to restore catchment function and natural processes, including restoration of features such as wetland mires via nature based solutions</p> <p>Develop and manage projects and initiatives to engage local communities in the management of their historic and natural environment</p> <p>Influence rural support mechanisms to ensure that they conserve and enhance and then promote them</p>

	FLM To support sustainable farming and forestry practices that conserve and enhance the special qualities of the AONB and deliver a range of ecosystem services			Continue to build collaborations with farmers and landowners and help build resilient, sustainable businesses	the work of AONB Teams
People	AE To ensure that opportunities to explore and enjoy the Blackdown Hills countryside and special qualities are compatible with conserving and enhancing natural beauty.	High quality development has strengthened the character of the area bringing economic, social and environmental benefits	Planning policies that support the purpose of designation	Build a robust evidence base	6. Number of partnerships (steering groups, research initiatives, etc) where the AONB Team promotes the delivery of the AONB Management Plan
	PD To conserve and enhance the natural beauty of the Blackdown Hills by ensuring that all development affecting the AONB is of the highest quality, sensitive to landscape setting and conserves its wildlife, historic character and other special qualities.	Quiet enjoyment respects special qualities and contributes to quality of life	Promote a strategic approach to management of rights of way and access sites	Continue to inform and influence the policy framework through additional planning guidance and tools to conserve and enhance landscape and natural beauty	
	TH To ensure that the impact on the landscape, environment and enjoyment of the AONB is considered in the planning, provision and management of transport networks and services.	Resilient communities have a strong sense of place and people share their environment and heritage with others	Initiatives that support health and well being	Projects which focus on using the natural and cultural environment to bolster people's health and wellbeing	
	RET To sustain a local economy that makes wise use of the resources of the AONB and conserves and enhances the natural beauty of the Blackdown Hills		Sustainable local transport initiatives	Influence rural economy support mechanisms to support local produce and natural capital	
			Availability of local, sustainable economic opportunities	Develop and support local supply chains and networks	
			Local communities have access to appropriate local facilities, services and amenities	Responsive and well used community and public transport that links people, recreation and facilities	
				Sensitive roll out of high quality broadband provision	

	<p>CC To foster vibrant, healthy and resilient communities who enjoy a high quality of life and feel connected to the AONB and its special qualities</p>				
<p style="writing-mode: vertical-rl; transform: rotate(180deg);"><b>Partnership and Promotion</b></p>	<p>CEA To promote a greater understanding, appreciation and enjoyment of the Blackdown Hills AONB and wider recognition of the designation and its purpose.</p> <p>PM To ensure that the special qualities of the AONB are better understood, valued, conserved and enhanced through an effective AONB Partnership</p>	<p>The special qualities of the AONB are widely appreciated, understood, conserved and enhanced</p> <p>Decisions are made based on a robust evidence base and change can be quantified</p>	<p>Identify and encourage opportunities for joint working and partnership delivery</p> <p>Ensure that people have a wider range of opportunities to explore, enjoy and learn about the Blackdown Hills</p>	<p>Collaborative communications campaigns</p> <p>Support countryside and heritage volunteering opportunities that contribute to the positive management of the AONB</p> <p>Promote, support and provide events and activities that offer outdoor experiences and learning that connect people with landscape, wildlife and heritage</p> <p>Encourage the appropriate use of the AONB for a wide range of education, study and research initiatives that will contribute to its conservation and enhancement and improve awareness of the potential impact of change on the landscape</p> <p>Produce a regularly updated State of the AONB report</p> <p>Review the AONB Management Plan every 5 years and ensure that the Delivery Plan element is reviewed annually</p>	

## APPENDICES

### Appendix A: General Guidance for Development Proposals

All applicants of development proposals in the Blackdown Hills AONB should consider the following and where possible demonstrate, through the planning application process how the development has responded positively to the AONB designation:

**Think Special Qualities** - explain how the development will impact on the special qualities of the Blackdown Hills AONB and what actions you are taking both to conserve and to enhance landscape, scenic beauty and other factors of natural beauty;

**Think Enhancement** - positively set out to 'enhance' the natural beauty of the AONB with your development proposal – be proud of your contribution to this special place;

**Think Location** - avoid development that creates incongruous features in prominent and highly visible locations that detract from the long views and open character of the Greensand plateau and views from or to the ridge lines, undeveloped valley sides and scarps of the AONB. Fit development into the landscape not on top of it;

**Think scale and massing** - again this will help reduce harmful impact on the prevailing character of the AONB;

**Think vernacular** - consider how the development relates to the vernacular style of local building materials and styles;

**Think biodiversity** – explain how the development impacts on the biodiversity assets of the AONB and how you will avoid, mitigate, or as a last resort compensate for any residual impacts;

**Think dark skies** - consider the need for and impact of artificial lighting. Dark skies are recognised as important elements of tranquillity and contribute to the sense of wildness and remoteness as well as being culturally important;

**Think geology, soil, air and water** - explain how the development impacts on these natural capital assets of the AONB and how you will avoid, mitigate, or as a last resort compensate for any residual impacts;

**Think cumulative effects** – identify, describe and evaluate whether there are cumulative effects on the different natural beauty criteria which although alone may appear to be insignificant when considered together have a greater impact on the AONB. Identify and describe whether there are cumulative impacts from your development in combination with development already in place, or that which is reasonably foreseeable (such as allocated sites and sites with planning permission).

*Acknowledgement D Dixon/South Devon AONB Unit*

## Appendix B: Major Development

Footnote 55 of the NPPF clarifies that:

- *'For the purposes of paragraphs 172 [relating to protected landscapes, including AONBs] and 173 [relating to Heritage Coasts], whether a development is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'.*

As such, it is not possible or appropriate to apply a blanket definition for what should be treated as major development in the Blackdown Hills AONB. Nevertheless, there are some key factors that help to define if a development is major, as outlined below.

The purpose for which the Blackdown Hills AONB has been designated is to conserve and enhance its natural beauty. Therefore, the judgement as to whether or not a development is major development depends, to a large degree, on whether or not the development could have a significant adverse impact on the natural beauty of the AONB. As outlined in Chapter 3, natural beauty incorporates a number of criteria, including landscape quality, scenic quality, tranquillity, natural heritage and cultural heritage. Within the context of the Blackdown Hills AONB, those aspects of the AONB's natural beauty which make the area distinctive and which are particularly valuable – the AONB's 'special qualities' - are also described in Chapter 3.

On this basis, a development should be considered 'major' if, by reason of its nature, scale, location and/or setting, it could have a significant adverse impact on any of the above criteria, including the AONB's 'special qualities'. As well as potential impacts within the AONB, consideration should also be given to impacts on these criteria within the setting of the AONB, particularly in the context of visual impact (i.e. views into and out of the AONB) and impacts on tranquillity.

As outlined in paragraph 172 of the NPPF, to help inform whether there are exceptional circumstances, and whether it can be demonstrated that the development is in the public interest, applications for such development should include an assessment of:

*a. 'the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy';*

The AONB Partnership would expect any such development proposal be accompanied by a statement of need in the context of national and local considerations and, ideally, in the context of needs arising from within the AONB. The impacts of permitting or refusing the development should be clearly identified in respect of the local economy, ideally including that of the local communities affected. Such a statement should be based upon objective assessment and clear evidence.

*b. 'the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way';*

The AONB Partnership would encourage any such development proposal to be accompanied by a report setting out a sequential approach to site selection. This should evidence the extent to which alternative sites have been assessed before the selection of sites within the AONB, and clearly identify why sites outside of the designated area could not be developed. The report should also identify and evidence why the need for the development could not be met in some other way. The report should include relevant evidence regarding the cost of developing outside the AONB. The AONB Partnership is mindful of the judicial review decision in relation to development in Cornwall AONB<sup>18</sup> which confirmed that even if there are exceptional circumstances generally, such as the need for housing, this does not necessarily equate to exceptional circumstances for a particular development because there may be alternative sites that could result in less harm to the AONB. These can be outside the local planning authority's area. Thus the proper consideration of alternatives, (with a view to ascertaining if alternative(s) which would result in less harm to the AONB exist), is an essential component of exercising the assessments correctly.

*c. 'any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated'.*

The AONB Partnership would expect any such development proposal to be accompanied by a report identifying any detrimental effects upon the environment, the landscape and recreational opportunities. Such a report should relate directly to the natural beauty and special qualities of the AONB as a whole as well as those specific to the development site.

Any mitigation identified to moderate these impacts should be:

- clearly detailed, in line with the duty to conserve and enhance the AONB,
- be compatible with the objectives and policies of the AONB Management Plan,
- be compatible with special qualities and local landscape character, and
- be capable of realisation through robust planning conditions or obligation.

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<sup>18</sup> R (Mevagissey Parish Council) v Cornwall County Council [2013] EWHC 3684 (Admin)

## Appendix C: Legal Framework for AONBs

AONBs exist within a legal framework which has been progressively strengthened since the first AONBs came into existence after the Second World War.

The **1949 National Parks and Access to the Countryside Act** first established the AONB designation, provided AONBs with protection under planning law against inappropriate development and gave local authorities permissive powers to take action for '*preserving and enhancing natural beauty*' in them.

The **Countryside Act 1968** placed a responsibility on local authorities, the statutory conservation bodies, and civil servants, in exercising their functions under the 1949 Act (as amended by subsequent legislation) to '*have due regard to the needs of agriculture and forestry and to the economic and social interests of rural areas.*' Within AONBs, this means a responsibility to acknowledge and, where appropriate, to promote farming, forestry and the rural economic and social context wherever this can be done without compromising the primary purpose of conserving natural beauty.

The **Environment Act 1995** introduced the phrase 'conserve and enhance' in place of 'protect and enhance' in relation to duties of local authorities, the Environment Agency and other bodies. No statutory duties were placed on local authorities actively to manage AONBs in any particular way.

The **Countryside and Rights of Way Act 2000** (CRoW) subsumes and strengthens the AONB provisions of the 1949 Act. It confirms the purpose and significance of AONBs, clarifies the procedure for their designation, and created a firm legislative basis for their designation, protection and management. In particular;

**Section 82** reaffirms the primary purpose of AONBs: to conserve and enhance natural beauty.

**Section 83** establishes the procedure for designating or revising the boundaries of an AONB, including Natural England's duty to consult with local authorities and to facilitate public engagement.

**Section 84** confirms the powers of a local authorities to take '*all such action as appears to them expedient*' to conserve and enhance the natural beauty of an AONB, and sets consultation and advice on development planning and on public access on the same basis as National Parks in the 1949 Act.

**Section 85** places a statutory duty on all 'relevant authorities' to '*have regard to the purpose of conserving and enhancing the natural beauty*' of AONBs when coming to any decisions or carrying out activities relating to or affecting land within these areas. 'Relevant authorities' include all public bodies (including county, borough, district, parish and community councils, joint planning boards and other statutory committees); statutory undertakers (such as energy and water utilities, licensed telecommunications companies, nationalised companies such as Network

Rail and other bodies established under statute responsible for railways, roads and canals); government ministers and civil servants. Activities and developments outside the boundaries of AONBs that have an impact within the designated area are also covered by the 'duty of regard'.

**Sections 86 to 88** allow for the establishment in an AONB of a Conservation Board to which the AONB functions of the local authority (including development planning) can be transferred. Conservation Boards have the additional but secondary function of seeking to increase public understanding and enjoyment of the AONB's special qualities. They also have an obligation to '*seek to foster the economic and social well-being of local communities*' in co-operation with local authorities and other public bodies.

**Sections 89 and 90** create a statutory duty on all AONB partnerships (local authorities and Conservation Boards) to prepare a Management Plan '*which formulates their policy for the management of their area of outstanding natural beauty and for the carrying out of their functions in relation to it*', and thereafter to review adopted and published Plans at intervals of not more than five years. Where an AONB involves more than one local authority they are required to do this '*acting jointly*'.

**Section 92** makes clear that the conservation of natural beauty includes the conservation of '*flora, fauna and geological and physiographical features*.'

The **Natural Environment and Rural Communities Act 2006** (NERC):

**Section 99** formally clarifies in law that the fact that an area consists of or includes land used for agriculture or woodlands, or as a park, or '*any other area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape*' does not prevent it from being treated, for legal purposes '*as being an area of natural beauty (or of outstanding natural beauty)*.'

**Schedule 7** asserts that an AONB joint committee of two or more local authorities, or a conservation board, can constitute a 'designated body' for the performance of functions allocated to Defra.

## Appendix D: Organisations represented on the Blackdown Hills AONB Partnership

Blackdown Hills Business Association  
Blackdown Hills Hedge Association  
Blackdown Hills Trust  
Blackdown & East Devon Woodland Association  
Blackdown Hills Artist & Makers  
Blackdown Hills Parish Network  
Blackdown Hills Rough Grazing Association  
Blackdown Support Group  
British Horse Society  
Butterfly Conservation  
Campaign to Protect Rural England  
Community Council for Somerset  
Council for Voluntary Service (Mid Devon)  
Country Land and Business Association  
Devon Communities Together  
Devon Biodiversity Records Centre  
Devon County Council  
Devon Wildlife Trust  
Devon Women's Institute  
Devon Youth Association  
Devon Young Farmers Club  
East Devon Council for Voluntary Service  
East Devon District Council  
Environment Agency  
Ferne Animal Sanctuary  
Forestry Commission  
Forest Enterprise  
FWAG South West  
Historic England  
Mid Devon District Council  
National Farmers Union  
National Trust  
Natural England  
Neroche Woodlanders  
Otterhead Estate Trust  
Parish councils (falling entirely or partially within the AONB)  
Ramblers Association  
Royal Society for the Protection of Birds  
Somerset County Council  
Somerset Environmental Records Centre  
Somerset Rural Youth Project  
Somerset Wildlife Trust  
Somerset Women's Institute  
Somerset Young Farmers Club  
South Somerset District Council  
South West Heritage Trust  
Taunton Deane Borough Council  
Transition Group (Blackdown Hills)  
Wessex Water

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**CABINET  
30 MAY 2019**

## **REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION**

### **STAGE 1 PUBLIC CONSULTATION CULM GARDEN VILLAGE VISION & CONCEPT EAST CULLOMPTON MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT: ISSUES, OPPORTUNITIES AND CONCEPTS (PHASE 1 CULM GARDEN VILLAGE)**

**Cabinet Member** \*\*\*\*\*  
**Responsible Officer** Mrs Jenny Clifford, Head of Planning, Economy and  
Regeneration

**Reason for Report:** To note the outcomes of the recent stage 1 public consultation on two documents: 1) a Vision & Concept for the Culm Garden Village; and 2) an East Cullompton Masterplan SPD Issues, Opportunities & Concepts in respect of Phase 1 of the Culm Garden Village.

**RECOMMENDATION:** That Cabinet note the report.

**Relationship to Corporate Plan:** Contribution to delivering the priorities of the Corporate Plan 2016 to 2020; Economy, Homes, Community and Environment.

**Financial Implications:** Delivery of significant housing phased with infrastructure and employment growth will play a pivotal role in bringing forward corporate aspirations to facilitate growth within the district which in turn will help boost the economy. Progress with delivery of housing at Culm Garden Village will help unlock funding streams for infrastructure delivery.

**Legal Implications:** None at this stage except that consultation is taking place in accordance with the requirements of the Council's Statement of Community Involvement and forms an intrinsic part of the production of Supplementary Planning Documents. In future consultations, account will need to be taken of those comments which were critical of the level of detail provided.

**Risk Assessment:** Risks associated with the delivery of the Vision for Culm Garden Village include the current lack of planning status for the wider Garden Village (only Phase 1 East Cullompton is currently identified as an emerging allocation), and the requirement to fund the infrastructure required to deliver the project.

**Equalities:** No equalities implications are anticipated as a result of this report.

#### **1.0 Background**

1.1 Two reports were considered at the meeting of Cabinet on 3 January 2019 for approval of documentation in relation to stage 1 public consultation on two documents: 1) a Vision & Concept for the Culm Garden Village; and 2) an

East Cullompton Masterplan SPD Issues, Opportunities & Concepts in respect of Phase 1 of the Culm Garden Village.

- 1.2 The reports set out the background to the project, the planning context, details of the proposed consultation materials, including their scope and purpose, and the proposed consultation methods and timescales.
- 1.3 At the meeting of Cabinet on 3 January 2019 it was resolved in respect of each of the two reports:
  - a) That the document at Appendix 2 be approved for Stage 1 public consultation.
  - b) The proposed amendments to the document set out in Appendix 1 be approved
  - c) Delegated authority be given to the Head of Planning, Economy and Regeneration in consultation with the Cabinet Member for Planning and Economic Regeneration to finalise consultation material.

## **2.0 Stage 1 public consultation**

- 2.1 Public consultation took place over a six-week period from 18 January 2019 to 1 March 2019 on two documents:
  1. The draft Culm Garden Village Vision & Concept Document that sets out a Vision and a number of key principles to guide development at the proposed new garden village, together with a Concept Plan which starts to add shape to ideas on how the garden village might look.
  2. The East Cullompton Masterplan Supplementary Planning Document: Issues, Opportunities & Concepts document that sets out a number of issues and opportunities based on an analysis of the site, brought together to inform some initial concepts for the masterplanning of the East Cullompton Local Plan Review allocation, which will form Phase 1 of the garden village.
- 2.2 Permanent exhibitions of the display material were set up at The Hayridge, Cullompton and Kentisbeare Village Hall and 6 staffed exhibitions were held, 4 in Cullompton and 2 in Kentisbeare. The documents, display materials and online questionnaires were also available on the Culm Garden Village website.
- 2.3 The staffed exhibitions were held at varying times: during the morning, afternoon, evening and on Saturday mornings and were attended by 292 people over the 6 week period: 129 in Kentisbeare and 163 in Cullompton. Kentisbeare Parish Council also opened Kentisbeare Village Hall to enable residents to view the display materials on a Saturday morning during the consultation period and the Parish Council has reported that 80 people attended this event.
- 2.4 At the start of the consultation, feedback was given by Cullompton Town Council and Kentisbeare Parish Council that the questionnaires were too difficult for many people to understand and contained too much jargon. The

questionnaires were immediately simplified and the original questionnaires replaced.

- 2.5 The relationship between the two documents and the planning status of the two different areas (East Cullompton Phase 1 and the wider garden village) was also considered by respondents to be difficult to understand and it was suggested that this could have been made clearer in the consultation material.
- 2.6 A total of 423 responses were received: 314 for the Vision & Concept and 109 for the Masterplan SPD. Of the 423 responses, 329 were received via the online questionnaires and 94 via paper questionnaires, emails or letters.
- 2.7 A detailed summary of the public consultation responses on both documents is attached as **Appendix 1**.
- 2.8 Responses were received from the following statutory and other consultees:

Highways England  
Environment Agency  
Sport England  
Devon & Cornwall Police  
Devon County Council  
    Highway Authority  
    Education  
    Waste  
    Historic Environment  
    Lead Local Flood Authority  
    Public Health  
    Economy and Enterprise  
Devon Clinical Commissioning Group  
Natural England  
NHS Royal Devon & Exeter Hospital  
South West Water  
Cullompton Town Council  
Kentisbeare Parish Council  
Bradninch Town Council  
East Devon District Council

A summary of these responses for both documents is attached as **Appendix 2**.

It is intended to publish a detailed summary of the public consultation responses on the Culm Garden Village website and to publish in full statutory and other consultee responses, including from the Town and Parish Councils.

### **3.0 Key themes: Vision and concept**

- 3.1 A number of key themes emerged from the consultations that were mostly common across the two documents. For the Vision and Concept document these were:

Principle of development; transport; integration with Cullompton; green and blue infrastructure; delivery of community facilities and green space; sustainability; affordable housing; and provision of a green buffer zone.

The consultation also asked for suggestions for a name for the garden village. The top 5 suggestions are set out in the responses to question 1 in **Appendix 1**.

3.2 The main points under the key themes are set out below.

*Principle of development*

3.3 Respondents found it confusing that the consultation was asking people to comment on what the garden village should be like when there was no question asking people what they thought of the principle of developing the wider garden village (up to 5,000 new houses). Whilst the document explained the planning framework and the need to further consult upon and allocate the wider garden village in future planning documents, many respondents found this difficult to grasp.

3.4 Similarly, the lack of a “red line boundary” around the potential wider garden village caused concern with residents suspicious of the intentions behind this lack of clarity. Indicating such a red line at this stage would not be appropriate, being in advance of allocation of land within a Development Plan. It is the future allocation that will establish the development boundaries.

3.5 The need for the level of housing proposed was also questioned, and concern was expressed that the level was too high to cater for an identified local need. Similarly, the level of housing will be established through a future Development Plan and supported to associated evidence.

*Transport*

3.6 There was significant concern about the impact of increased traffic from new development on the surrounding road network, in particular on Junction 28 of the M5 motorway, the roads serving the motorway junction and Cullompton town centre, as well as on Honiton Road. Respondents highlighted the current lack of capacity at the motorway junction and problems of queuing traffic during the morning and evening peak periods, as well as large vehicles being unable to turn out of Kingsmill Industrial Estate because of congestion at the junction.

3.7 There was concern that insufficient work had been carried out on potential motorway junction improvements/solutions to provide any clarity or comfort to residents that the necessary improvements were either feasible or deliverable.

3.8 The nature of the surrounding road network was also a concern, with many of the surrounding roads being rural lanes and the potential raised for these lanes to become rat-runs to avoid congestion on the main routes from increased traffic. The ability of the existing road to Honiton (A373) to accommodate additional traffic was also a concern, particularly as the road is narrow in places and unable to accommodate large vehicles passing one another.

- 3.9 The timing of the delivery of motorway junction improvements and the town centre relief road was considered crucial, not only to provide for new development, but to deal with existing traffic problems experienced by residents.
- 3.10 The re-opening of Cullompton railway station was welcomed but concern was raised in responses that there was no certainty that this would actually happen. The need for improvement to local and rapid bus services was also highlighted.
- 3.11 The Highway Authority (Devon County Council) has recognised these concerns and has recommended the preparation of a sustainable and holistic transport strategy as fundamental to ensuring development impacts at the Garden Village are managed and mitigated in an appropriate manner.
- 3.12 Highways England recognised the need to improve access to the M5 motorway but is also supportive of a sustainable approach to development to reduce traffic on the strategic road network. Highways England consider it essential that the development strikes the appropriate balance between the provision of significant additional housing, employment opportunities and local facilities to create a sustainable new community, and that delivery is phased to match the provision of the necessary transport infrastructure in order to minimise the traffic impact on the strategic road network.

*Integration with Cullompton*

- 3.13 The concept of walkable neighbourhoods was supported. However, concern was raised about the ability of the new development to integrate with the existing town, particularly bearing in mind the limited ability to create new pedestrian and cycle links across the motorway/railway/River Culm. Respondents considered good pedestrian, cycle and bridleway links into Cullompton (separated from road traffic) and the surrounding area to be essential.

*Green and blue infrastructure*

- 3.14 The concept of a landscape-led approach was supported generally provided green and blue infrastructure was good quality and provided wildlife habitats. The Environment Agency is supportive of multi-functional green and blue infrastructure, Natural Flood Management and sustainable urban drainage schemes. It considers that further work is required on flood risk and water quality and supports links between this project and the Connecting the Culm project. Natural England is supportive of wider green/blue corridors through the development to support wildlife and also encourages any proposal to incorporate measures to help improve people's access to the natural environment.

*Delivery of community facilities and green space*

- 3.15 Respondents considered it important that community facilities such as schools, sport, leisure, green space (including the proposed country park), medical, retail and community space, are delivered early to provide a good living standard for new residents and to minimise pressure on existing facilities.

### *Sustainability*

- 3.16 Respondents were supportive of sustainable development and wanted to see excellent public transport links, high quality employment and education provision on site, zero/low carbon development with renewable energy. The view was expressed that neighbourhoods should be walkable with clustered community facilities, built to standards to cater for disability, and include substantial green space focused on biodiversity. The use of the pylon runs as principal green routes and open space was not supported.

### *Affordable housing*

- 3.17 Respondents thought there should be a high proportion of affordable housing and that developers should not be permitted to reduce the proportion of affordable housing over time.

### *Green buffer zone*

- 3.18 The provision of a green buffer zone to separate new development from Kentisbeare village was supported. There was disagreement from respondents on where the buffer should be and what, if any, should be included within the zone. A high proportion of respondents wanted to see a clear buffer with no development except perhaps walking, cycling and horse riding routes, whilst a higher proportion wanted to see sports facilities included within the buffer area (see page 5 of **Appendix 1**). Respondents considered that there should be green buffers between new development and other existing residential development.

## **4.0 Key themes: East Cullompton Masterplan SPD**

- 4.1 As stated, a number of key themes emerged from the consultations that were mostly common across the two documents. For the East Cullompton Masterplan SDP document these were:

Principle of development; transport; integration with Cullompton; identification of existing issues and features; community facilities, sport and leisure and green space; housing; employment; delivery; and relationship to the wider garden village.

- 4.2 The main points under the key themes are set out below.

### *Transport and integration with Cullompton*

- 4.3 The same views were expressed in response to the Masterplan SPD consultation as in the Vision & Concept document (see 3.5 to 3.12 above).

### *Identification of existing issues and features*

- 4.4 Respondents expressed concern regarding the level of detail on the constraints plan and lack of supporting information, e.g. the lack of a catchment-based flood risk assessment and detailed topographical, landscape and wildlife surveys. The requirement to carry out further work on flood risk assessment and mitigation, water quality, and habitat analysis and enhancements was highlighted by the Environment Agency. The need for further work on the historic environment was also highlighted within the responses.

#### *Community facilities, sport and leisure, and green space*

- 4.5 Respondents wanted to see a range of sport and leisure provision, quality green space (not under the pylon runs), and a range of community facilities in clusters walkable from housing developments including local shops, comparison retail, leisure and sports facilities, healthcare, cafés, Post Office, food pub and community building. There should be plenty of free parking and space for the local centre/s to grow organically. The walkable neighbourhood concept and active walking and cycling provision were supported by Devon County Council Public Health. Concern was raised by some residents about the potential for sports facilities outside the allocated area and encroachment of these facilities into the rural area.
- 4.6 Natural England considers there may be significant opportunities to include green infrastructure in urban environments such as green roof systems and roof gardens; green walls to provide insulation or shading and cooling; new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). Consideration could also be given to issues relating to habitat connectivity, the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

#### *Housing*

- 4.7 Respondents were in favour of a high proportion of affordable housing for local people and a mix of house types and tenures to suit all age groups and to include consideration of those with disabilities. There was a mixed response to the potential for self-build development, with a number of respondents replying “don’t know” which could imply that more information is needed on this.

#### *Employment*

- 4.8 Many respondents wanted to see a more ambitious approach to employment delivery, focused on high skilled jobs, energy efficiency and links to skills providers. Respondents thought it important to also consider existing employment provision in the Cullompton area and the regeneration of Cullompton town centre.

#### *Delivery*

- 4.9 Whilst most respondents were supportive of high quality, sustainable development within the East Cullompton allocation, concern was raised around timely delivery of infrastructure and community facilities, maintaining the quality of the development throughout the planning and construction phases, and not allowing developers to water down the vision. Devon County Council has confirmed that primary school provision will need to be available as part of the first phase of development.

#### *Relationship to wider garden village*

- 4.10 Development of the East Cullompton allocation (Phase 1 garden village) was accepted by the majority of respondents, subject to the timely delivery of infrastructure and facilities. However, respondents expressed their strong concerns about development of the wider garden village, particularly as the principle of development had not been tested through the planning process and there was no formal boundary as yet.

## 5.0 Next steps

- 5.1 Next steps will be to further develop the two documents based on the consultation responses and further work and background studies being undertaken by the land promoters, Devon County Council and Mid Devon District Council. Many points have been raised within the representations received that will need careful consideration, response and identification of how they will inform the content of the emerging documents.
- 5.2 It is intended that a further report will be brought to a future Cabinet meeting, setting out in detail next steps and timescales for each of the two documents and the garden village project. This report therefore seeks only to provide feedback on the representations received in the form of key themes and summary responses. The further, future report will consider the response to those representations and next steps.

## 6.0 Appendices

1. Summary of public consultation responses
2. Summary of statutory and other consultation responses

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<b>Background Papers</b>	Cabinet 3 January 2019  Consultation materials on the Culm Garden Village website <a href="https://culmgardenvillage.co.uk/get-involved/">https://culmgardenvillage.co.uk/get-involved/</a>
<b>File Reference</b>	
<b>Circulation of the Report</b>	

## APPENDIX 1: PUBLIC CONSULTATION RESPONSES

Set out below are summaries of the public consultation responses on the two documents question by question. The questions in italics are those asked on the questionnaires that accompanied the consultation and exhibition materials

### 1. Culm Garden Village Vision & Concept

*Q1: 'Culm Garden Village' is a working name for the new settlement to the east of Cullompton. Do you have any ideas for a name for the new garden village?*

The top 5 most popular answers were:

Cullompton East/East Cullompton	20
Culm Garden Village/Culm Valley Garden Village	17
Stoneyford (Gardens/Green/Park)	15
Cullompton	12
Cullompton Garden Village	7

Other suggestions based on local features included Aller Village, Culm Brook, Estculme, Kenmarsh, Kingsford and Newlands.

*Q2: The map on page 9 of the Vision and Concept document shows issues and features that could influence the way the Garden Village is masterplanned. Are there any other issues and features that are not shown?*

The key points raised in response to this question were:

#### **Transport**

Route of the relief road; location of improved/new junction and related slips, feeder roads; impact on existing lanes; adequacy of Honiton Road; existing traffic queuing/problems; removal of Duke Street/Old Hill bridge; pedestrian/cycle routes into Cullompton; reality of delivery of railway station; and timing and delivery of transport infrastructure.

#### **Flooding/drainage**

Existing flood risk and adequacy of flood risk assessment; and sewage treatment facilities.

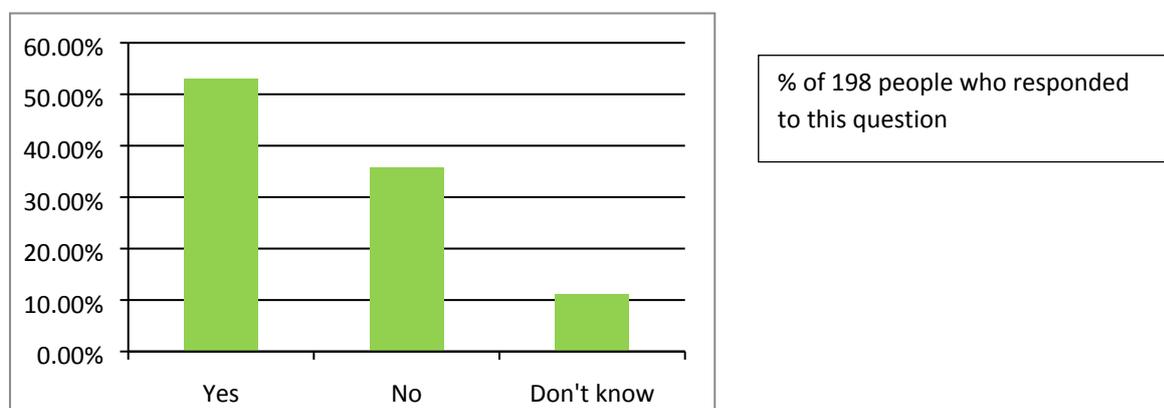
#### **Natural/rural/historic environment**

Sensitivities of surrounding villages and rural areas; agricultural land quality; views from Kentisbeare; quality wildlife and landscape areas to the south not shown, small ditches and watercourses not shown; traditional farm buildings not identified; heritage asset setting not explained.

Other issues raised included lack of analysis of healthcare provision, and lack of analysis outside of the Phase 1 boundary area.

This question was about existing issues and features rather than future proposals. A number of other points were raised relating to the future proposals that have also been included in responses to later questions.

Q3: The Vision for the Garden Village will express the type of *place we want the Garden Village to be*. Do you agree with the draft Vision shown on page 12 of the Vision and Concept document?



*Is there anything you would like to see prioritised or omitted?*

The 5 most cited things to prioritise were: early delivery of infrastructure (15); green buffer zone to Kentisbeare and other villages (13); improvements to local road network (11); new motorway junction (11); sustainable/low carbon buildings (10).

Disagreement to the Vision tended to be focused on the location, size and need for the development (34) and the proposals being unrealistic and not deliverable (11). Four people disagreed with integration with Cullompton.

Q4: The 9 key principles shown in the Vision and Concept document will guide the development of the Garden Village. Do you agree these are the right principles?

Embed the countryside within the Garden Village (bring the countryside into the developed area)				
	Yes	No	Don't know	Total
	78.36% (134)	16.96% (29)	4.68% (8)	171
A well connected and integrated new place (with good links, and integrated with Cullompton)				
	Yes	No	Don't know	Total
	80.81% (139)	15.70% (27)	3.49% (6)	172
Creating a healthy living environment				
	Yes	No	Don't know	Total
	89.70% (148)	9.70% (16)	0.61% (1)	165
Locally distinctive with well-designed neighbourhoods and places				
	Yes	No	Don't know	Total
	80.36% (135)	14.88% (25)	4.76% (8)	168
Community focused				
	Yes	No	Don't know	Total
	86.06% (142)	9.09% (15)	4.85% (8)	165

Great homes				
	Yes	No	Don't know	Total
	80.13% (125)	8.97% (14)	10.90% (17)	156
Ambitious employment opportunities				
	Yes	No	Don't know	Total
	79.38% (127)	9.38% (15)	11.25% (18)	160
Future proofed, SMART and sustainable (SMART: using new technologies to automate and connect)				
	Yes	No	Don't know	Total
	76.76% (109)	9.86% (14)	13.38% (19)	142
Delivery and stewardship (new ways to deliver development; involve the community)				
	Yes	No	Don't know	Total
	75.18% (103)	10.22% (14)	14.60% (20)	137

There were numerous comments on each of the principles, including ideas for refining these and potential issues around delivery.

*Q6: Under each of the 9 key principles, the Vision and Concept document (pages 14-31) sets out a series of objectives that explain further what the 9 key principles mean. Do you think these objectives are the right ones? Please provide your comments.*

Embed the countryside within the Garden Village: Comments included the need to ensure the proposals would provide quality space for wildlife and people, with attractive green walking and cycling routes and open space/parks that would actually be delivered. Other comments related to the countryside features already there being lost to development.

A well connected and integrated new place: The comments reflected concerns with the delivery of transport infrastructure (including a railway station) to address existing and potential future problems, providing quality walking and cycling routes into Cullompton, and ensuring the existing town centre is factored into plans.

Creating a healthy living environment: Comments focused on the need for local food production, provision for the elderly and those on low incomes, sport and leisure provision.

Locally distinctive with well-designed neighbourhoods and places: Comments focused on design for all, including disabled and blind people, and placing a stronger emphasis on creating social spaces that bring people together, catering for all age groups and sectors, as well as ensuring a commitment to quality of homes and public spaces.

Community focused: Comments focused on providing good community spaces and buildings in locations where people would naturally meet, sustainability and ensuring adequate funding for the future.

Great homes: Comments focused on the need for a good percentage of affordable (including social) housing, provision of decent housing with parking in a spacious setting.

Ambitious employment opportunities: Comments suggested the proposals were more ambitious and linked to existing education establishments in the area, as well as factoring in existing employment within Cullompton town centre.

Future proofed, SMART and sustainable: Comments stressed the importance of zero carbon and sustainability.

Delivery and stewardship: Comments focused on the need for more detail on this to ensure long term success of the community.

*Q6: With reference to Q5, do you think any of these objectives should be prioritised or omitted?*

The 5 most cited objectives to prioritise were: The connectivity and suitability of the roads including the M5 junction (21); timely delivery of infrastructure/services (12); integration with Cullompton, encouraging use of the town's facilities, and town centre parking (9); community pride and ownership/community focused (9); and green space (9).

There were few comments on omitting objectives but numerous concerns about successful delivery of the objectives.

*Q7: The Concept Plan on page 32 of the Vision and Concept document sets out how the Garden Village may be developed. Do you have any specific comments on the Concept Plan?*

Many of the comments on the Concept Plan were to do with the potential size of the garden village (too big) and the need for it to be in this location. There were also comments on the need to provide safe walking and cycling links into Cullompton, improving roads and delivery of the railway station. The need to provide walking and cycling links to the wider area was highlighted and there were concerns around using the pylon runs as green links. The need for delivery of employment, schools, medical, sport, leisure and other facilities was also highlighted. Many commented on the potential buffer zone for Kentisbeare (see below), and there were concerns about costs, delivery and timing of infrastructure and facilities. Concern was raised that the Concept Plan lacked detail and did not provide clarity on the longer term proposals, or how Phase 1 fitted with the wider garden village proposals.

It was suggested that the garden village be developed as a number of hamlets and also that the plan was reworked to reflect the real needs of the area.

*Q8: The Concept Plan shows a green landscape area to act as a buffer between the potential extent of the garden village and the village of Kentisbeare. Where do you consider the boundary of this landscape buffer area and the garden village should be located?*

The top 5 responses to where the boundary of the buffer should be were: Dead Lane (55), the Cullompton side of the Parish boundary with Kentisbeare (24), starts at Parish boundary (21), Horn Road (19), and as shown on the Plan (6).

*Q9: What type of facilities would be acceptable within the green buffer, for example, sports pitches?*

Responses were as follows:

Sport/formal recreation	99
None/farmland	59
Woodland/trees/parkland/meadows/wildlife habitats	42
Bridleways, footpaths, cycle tracks, trails	31
School	29
Housing	16
Swimming pool	5
Allotments	4
Dog exercise	3
Clay pigeon shooting, ploughing matches, hedge laying competitions, sheep dog trials	1
No particular preference	1

*Q10: Do you have any other comments on the document?*

Comments in this section reflected comments earlier in the questionnaire. The garden village was considered to be too big and many thought it should be restricted to Phase 1. The need for the scale of housing delivery for the local area was questioned, and concerns were raised about who would live there.

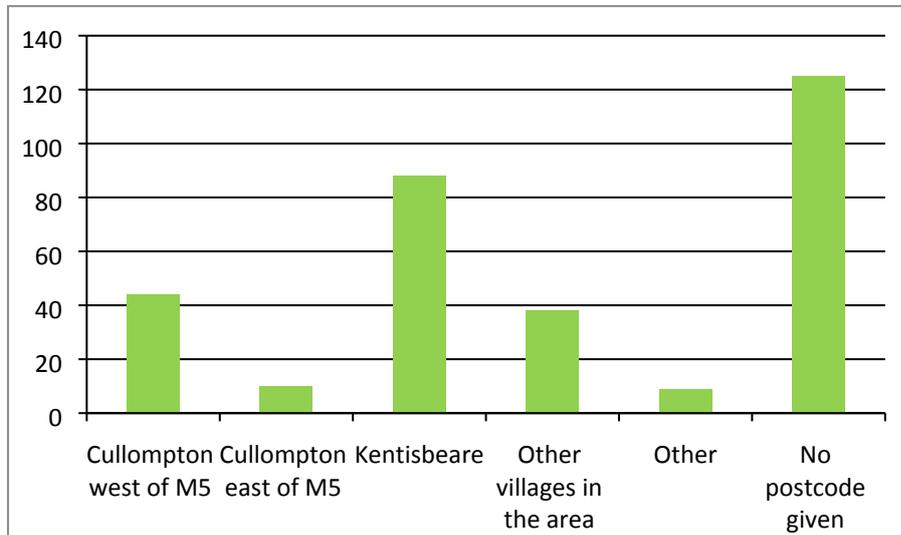
The loss of prime agricultural land and countryside was a key concern, as was the impact on nearby villages that had their own identity and community. The need for a strong buffer zone between the development and Kentisbeare was stressed in the responses. The impact of the development on the environment was another key concern, including the impact of the development on wildlife, flooding and pollution of the river Culm.

Transport concerns (including funding) were raised again, with the need to deliver improvements before housing is started a key message. The lack of clarity on transport proposals including an improved/new junction onto the M5 and any improvements to Honiton Road was a key concern. There was also concern that Network Rail has not included re-opening the railway station in its programme. Delivery of other infrastructure such as schools, healthcare, community facilities, the country park and sports facilities was a concern, especially around existing capacity for education and healthcare and the timescales for delivery of new facilities.

Some confusion was expressed over the relationship between the allocated East Cullompton (Phase 1) site and the remainder of the garden village with no planning allocation, including concern that no consultation has taken place yet on the principle of the garden village. The complexity of the documents and the questionnaire was also raised as a concern.

There were also many comments in support of the proposals and excitement about new sports facilities and affordable and self-build housing.

*Q10: Please tell us your postcode*



## **2. East Cullompton Masterplan SPD (Phase 1 Garden Village): Issues, Opportunities & Concepts**

*Q1: The map on page 24 of the Masterplan SPD document shows issues and features that could influence the way the East of Cullompton development is masterplanned. Are there any other issues and features that are not shown?*

The key points raised in response to this question were:

### **Transport**

Clear solution and strategy for infrastructure (transport and other infrastructure) required before masterplan can be progressed. Route of the relief road, location of improved/new junction and related slips, feeder roads and route for HGVs from Kingsmill Industrial Estate not shown; impact on existing lanes; adequacy of Honiton Road; Honiton Road not shown correctly; existing traffic queuing/problems; removal of Duke Street/Old Hill bridge not clear; pedestrian/cycle routes into Cullompton; reality of delivery of railway station; and timing and delivery of transport infrastructure; existing rights of way not shown.

### **Flooding/drainage**

Existing flood risk understated; inadequacy of flood risk assessment; more detailed/catchment based flood risk assessments needed; sewage treatment facilities and existing domestic sewage treatment plant not shown.

### **Natural/rural/historic environment**

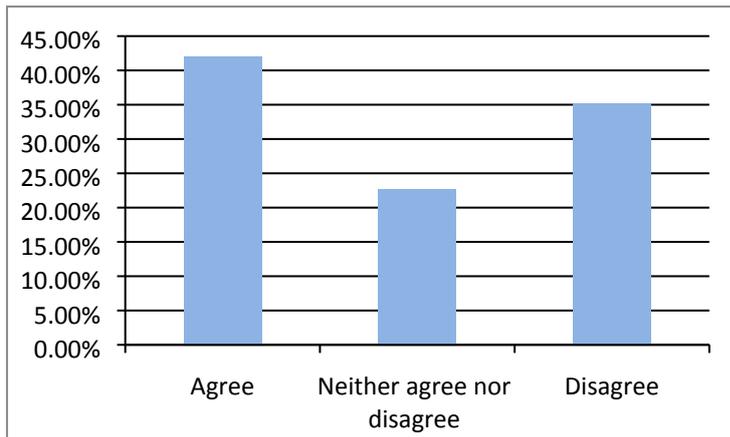
Agricultural land quality; views from Kentisbeare; small ditches and watercourses not shown; hedges containing protected species identified as low importance; wildlife sites missing; more detailed wildlife surveys needed; more detail of topography and landscape useful.

### **Other**

Pylons not correctly plotted. Issues have been understated.

This question was about existing issues and features rather than future proposals. A number of other points were raised relating to the future proposals, location of country park, and infrastructure delivery that have also been included in responses to later questions.

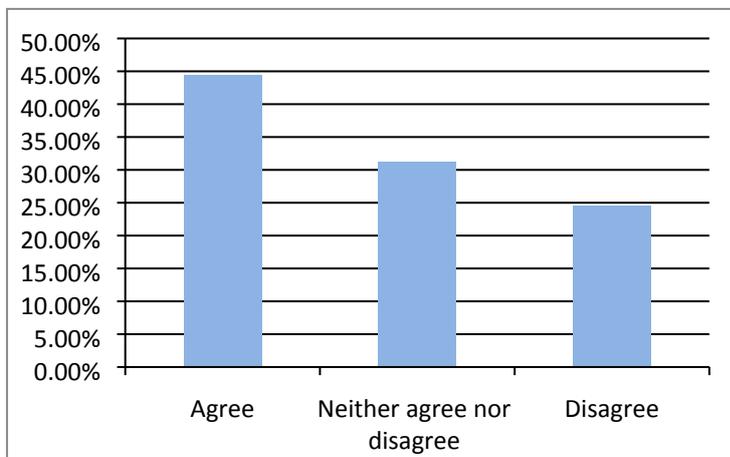
*Q2: Two powerlines cross the East of Cullompton development area as shown on the map on page 21 of the Masterplan SPD. These could form wide, green corridors as part of a green network running through the development. Do you agree or disagree with this approach?*



% of 88 people who responded to this question

Concern was raised in the responses about the health risks of siting public green space under the pylon runs and suggestions that the cables should be underground where possible. Concern was expressed that using the pylon runs for green space would reduce the provision of more suitable facilities elsewhere, and suggestions that larger areas of green space would be better, for example, a country park and sports facilities.

*Q3: The map on page 28 of the Masterplan SPD shows a potential transport, walking and cycling network to serve the East of Cullompton development with potential to expand this into the wider garden village and improve connections into Cullompton. Do you agree or disagree with this strategy?*



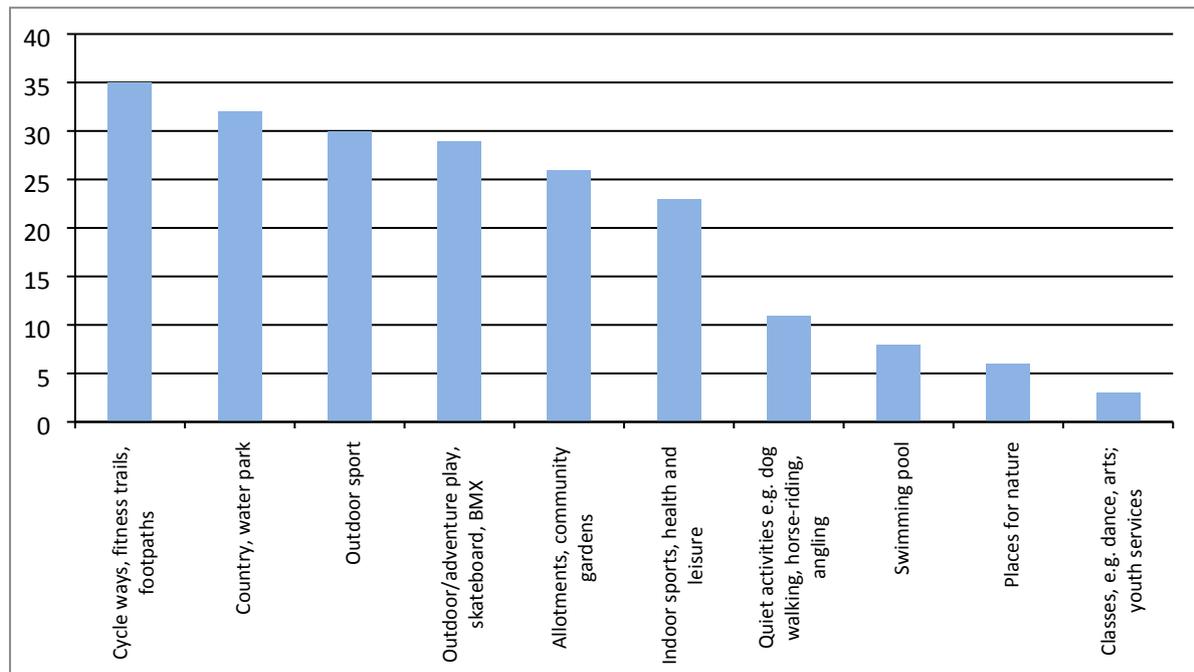
% of 90 people who responded to this question

Concerns about the suitability of the surrounding road network and access to the M5 were raised again in response to this question, with delivery of road and junction improvements and re-opening of the railway station needing to be planned, costed and prioritised before moving forward with the masterplan. Finalising the route of the improved/new motorway junction and feeder roads should be a priority. The provision of better bus services was important and concerns were expressed about the treatment of Honiton Road. There was a suggestion that the roads should go under the pylon runs.

Respondents were particularly concerned about the ability to cross the M5 motorway, railway and river via a safe walking and cycling route, particularly if Old Hill/Duke Street bridge were to be removed. Suggestions were made that new

routes are designed to link into the wider garden village and extended to meet existing walking and cycling routes, e.g. Sustrans routes. Provision for new bridleways should be included.

*Q4: The network of green corridors and open spaces, rivers and water features shown on the map on page 27 could provide opportunities to provide sports, health and leisure uses. What types of uses do you consider important to promote healthy living and why? Examples could be formal sports, outdoor play areas, cycleways, fitness trails, allotments, water activities.*



Comments included ensuring the facilities do not flood, are not under the pylons and are easy to access. A number of people were concerned about the “green node” to the east of the allocation (coinciding with the potential location of Cullompton rugby club), this being outside the allocation and separate from its development. Several respondents were concerned about potential for traffic and flood lighting from new sports facilities. Several respondents were concerned about the ongoing management and maintenance of facilities and others thought it would be for the new community to decide what they wanted.

*Q5: The emerging Local Plan policy requires a shopping and community centre and an area of 2ha is required to provide for this. This could include a range of shops and services e.g. local shops, cafés, pub, community building, leisure/sports centre and health care provision. The map on page 36 of the Masterplan SPD shows one potential location for a local centre. Looking at the map on page 36, where do you think the local centre should be located and what key uses do you think it should include?*

Respondents considered that the local centre should be near the centre of the development with easy access from Honiton Road. The local centre should be co-located with the primary school, enabling parents to use facilities such as the health centre, and provide a focal point and meeting place.

Respondents wished to see local shops, comparison retail, leisure and sports facilities, healthcare, cafés, Post Office, food pub and community building. There should be plenty of free parking and space for the local centre to grow organically. Community facilities should be clustered so that walking and cycling between them is straight forward and pleasant. The local centre(s) should be designed to discourage anti-social behaviour, with no late night activities to disturb residents.

The local centre(s) should facilitate the amount of homes being provided in the overall garden village, with the potential for more than one local centre. All buildings should be highly energy efficient and incorporate renewable electricity technology as standard.

*Q6: What types and tenures of housing do you think is needed within the allocation?*

Family homes to buy (3, 4, 5 bedroom)				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	80.60% (54)	11.94% (8)	7.46% (5)	67
Starter/smaller homes (1, 2 bedroom)				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	83.33% (60)	11.11% (8)	5.56% (4)	168
Apartments				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	54.69% (35)	31.25% (20)	14.06% (9)	64
Affordable homes				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	86.42% (70)	9.88% (8)	3.70% (3)	81
Extra care apartments				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	76.92% (50)	13.85% (9)	9.23% (6)	65
Self-build				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	57.14% (36)	26.98% (17)	15.87% (10)	63
Adaptable/lifetime homes				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	69.35% (43)	12.90% (8)	17.74% (11)	62
Live/work units				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	54.72% 29	16.98% 9	28.30% 15	53
Highly energy efficient homes				
	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Total</b>
	84.48% (49)	5.17% (3)	10.34% (6)	58

*Are there any other types and tenures of homes you would like to see?*

Respondents wanted to see bungalows with easy access to facilities and end of life care provision. Reference was made to the RNIB Building Guide and the Design Council's Wheelchair Access housing guide.

There should be good mix of types and tenures with well-spaced, good quality, characterful housing, not “boxes” as on modern housing developments. There should be no high rise apartment blocks.

There should be an emphasis on priority being given to local people and a good proportion of affordable housing, particularly social rented housing. Types and tenures should depend on housing need in the area. There should be a mix of self-build plot sizes, but respondents were concerned about consistency and quality of appearance of self-build homes.

All homes should be energy efficient with renewable energy and battery storage, with a high proportion of eco-homes.

*Q7: What type of employment opportunities do you think should be included within the allocation?*

Industrial units				
	Yes	No	Don't know	Total
	47.46% (28)	40.68% (24)	11.86% (7)	59
Offices				
	Yes	No	Don't know	Total
	69.70% (46)	18.18% (12)	12.12% (8)	66
High tech/digital/low carbon companies				
	Yes	No	Don't know	Total
	80.30% (53)	12.12% (8)	7.58% (5)	66
Small/flexible workspaces				
	Yes	No	Don't know	Total
	80.65% (50)	12.90% (8)	6.45% (4)	62
Hubs providing services for home workers				
	Yes	No	Don't know	Total
	61.67% (37)	16.67% (10)	21.67% (13)	60
Homes with workspaces				
	Yes	No	Don't know	Total
	63.79% (37)	20.69% (12)	15.52% (9)	58
Retail/leisure/tourism				
	Yes	No	Don't know	Total
	69.35% (43)	20.97% (13)	9.68% (6)	62

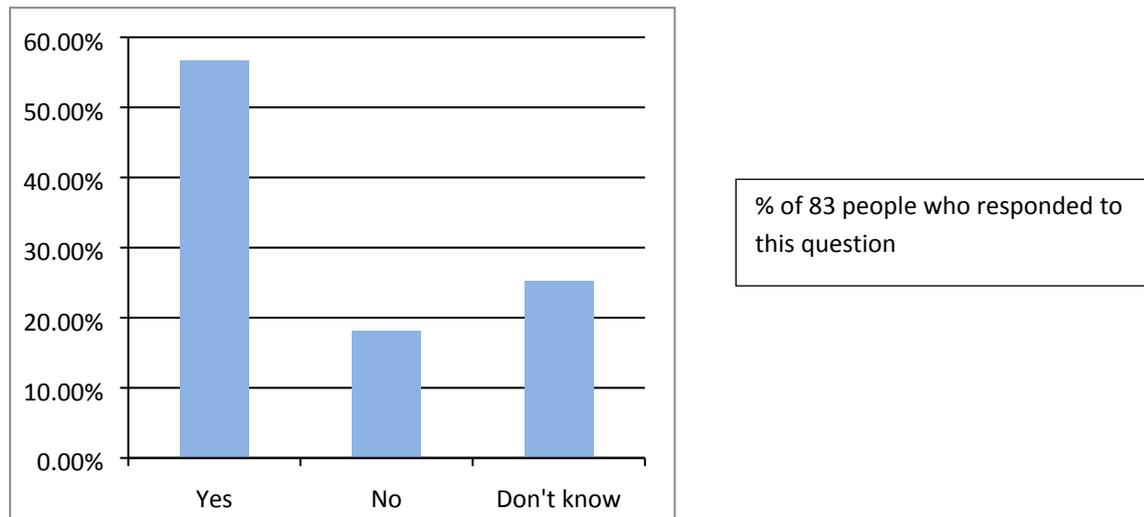
*Are there any other employment opportunities/workspaces you would like to see?*

Respondents wished to see high skilled jobs, rather than low paid employment, to balance the mix of high and low skilled jobs across the area. There needs to be a more ambitious vision based on a thorough understanding of business needs, flexible spaces on flexible terms, an attractive environment and a focus on businesses of the future and links to Exeter Science Park, training and apprenticeships. There needs to be incentives to encourage new businesses.

Respondents commented that employment buildings should have renewable energy and high speed broadband as standard, and housing should be provided to cater for home working, and trades persons with space for vans and storage.

Some respondents thought that expanding existing industrial estates and regenerating Cullompton town centre were preferable strategies.

**Q8: Is it important for community groups to be able to manage community facilities themselves?**



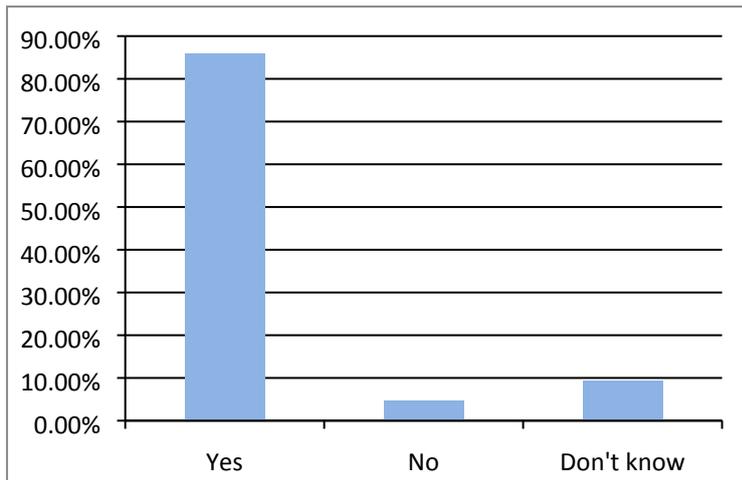
**Do you know of any existing community groups that might be interested in this or can you suggest how this might work?**

Respondents suggested the following organisations might be interested in managing facilities: Cullompton Town Council, St Andrews Church, the YMCA, Cullompton cricket and rugby clubs, Young Farmers.

Respondents were mostly in favour of communities managing facilities themselves but were concerned that sufficient funds be available to set up and continue to run these facilities and that this requirement is not under-estimated. Working models elsewhere should be considered.

St Andrews Church has a strong community building focus and would be interested in helping with this aspect.

**Q9: Is the focus on SMART and sustainable development the right approach to development? Examples of this could be high energy efficient homes and business units, low carbon and energy plus construction, climate change adaptation through the natural environment, driverless cars, and digital connectivity.**



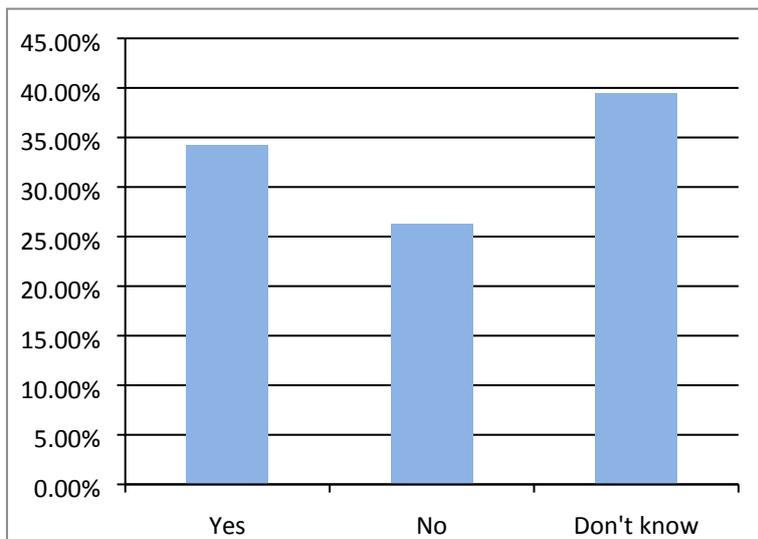
% of 85 people who responded to this question

Comments in answer to this question included the need to think about the future and prepare. High speed broadband, solar panels, energy efficient and climate-adapted buildings are essential, and low carbon construction and use of local materials are also important considerations.

Respondents considered that unless this was planned carefully and implemented properly, and developers are required to deliver on these aspects, additional housing, employment and vehicles on the road would not equal smart or sustainable development.

Some respondents thought this was too futuristic and there should not be driverless cars or architecture that did not respect the character of the area. Other respondents did not think that building houses on green fields represented sustainability.

*Q10: Do you think the suggestions for development of the East of Cullompton allocation set out in the Masterplan SPD reflect the draft Vision and Principles for the wider Garden Village shown on page 8 of the Masterplan SPD?*



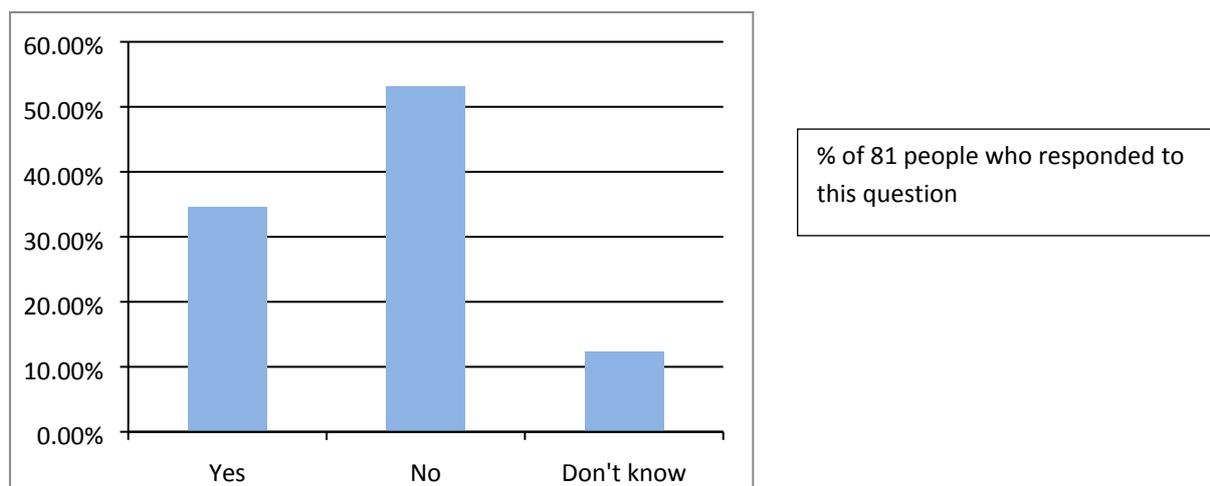
% of 76 people who responded to this question

Comments in response to this question included support for the ambition Vision but concerns about actual delivery. There was concern that the plan for a high quality, green, new place, would be watered down by developers and the development would end up the same as countless other new housing estates.

Timing and delivery of infrastructure was considered essential for the development to meet the Vision and Principles. Linked to this, respondents thought that priority should be given to delivery of essential infrastructure (needed now) rather than production of an attractive Vision, and emphasis given to ensuring that transport infrastructure can be delivered. There was concern about the level of detail and the substance behind the words.

Some respondents considered that development of the East Cullompton allocation area was more palatable than development of a much larger garden village, and did not consider that the housing numbers had been justified for a larger development. Several respondents considered the larger garden village should not be taken forward.

*Q11: Overall, do you think that the identified opportunities for the first phase of the garden village shown in the Masterplan SPD document are the right ones to help to start to deliver the Garden Village?*

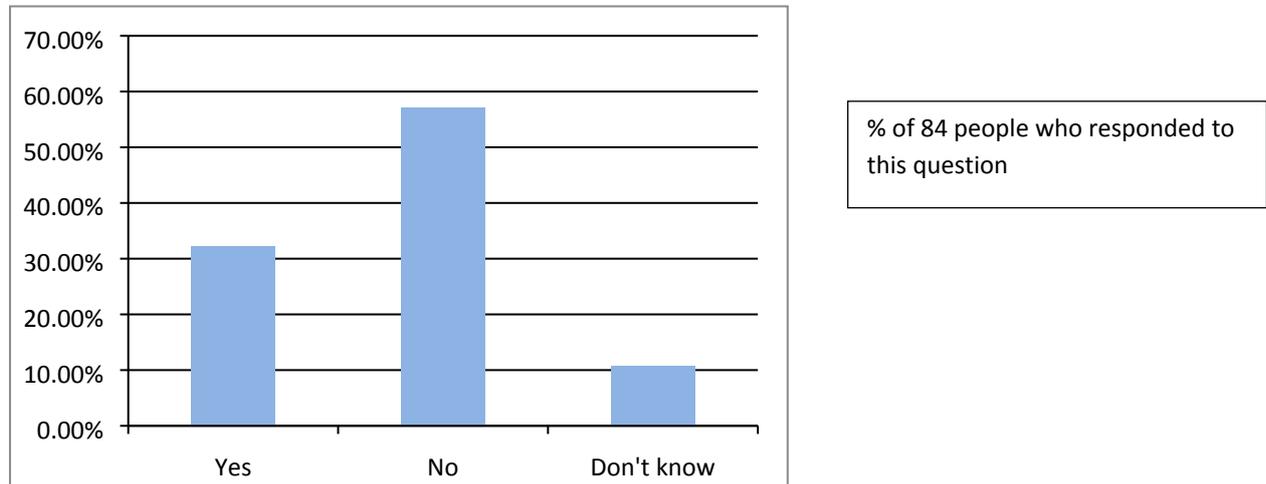


Most of the responses to this question reflected the concerns expressed in answers to other questions: the key points relating to the existing transport infrastructure issues and delivery of transport solutions. Respondents wanted to see infrastructure provided before housing and fears were expressed that the housing would be provided without the necessary physical and social infrastructure.

Most of the negative responses to this question focused on the overall size of the potential wider garden village, i.e. a strong view that the East Cullompton allocation should not form Phase 1 of the wider garden village, but the entire garden village. Some respondents commented that the garden village should not extend into Kentisbeare Parish.

*Q12: Do you agree with the potential scope and content of the Masterplan SPD shown on page 37?*

This question was intended to gather opinions on the proposed contents of the Masterplan SPD as listed on page 37 of the document. However, the “scope” seemed to have been taken to mean “scale” of the development and the majority of responses were focused on this aspect.



Many respondents commented on the principle of development (should not go ahead) or that the proposal was far too large. It is not clear whether the size of the development being commented on was in relation to the East Cullompton allocation or the potential wider garden village. There were also comments that residents had not been asked if they wanted the garden village in the first place. This comment must be in relation to the wider garden village which has not yet been allocated for development, as the public consultation process has been followed for the Local Plan Review allocation.

There were comments on the lack of quantified justifications for the proposals, transport issues, integration with Cullompton, and the need to consider Cullompton town centre (as previously summarised). Where key areas of the SPD were identified in the responses, again these related to prioritising transport and other infrastructure delivery.

*Q13: Do you have any further comments on the Masterplan SPD document?*

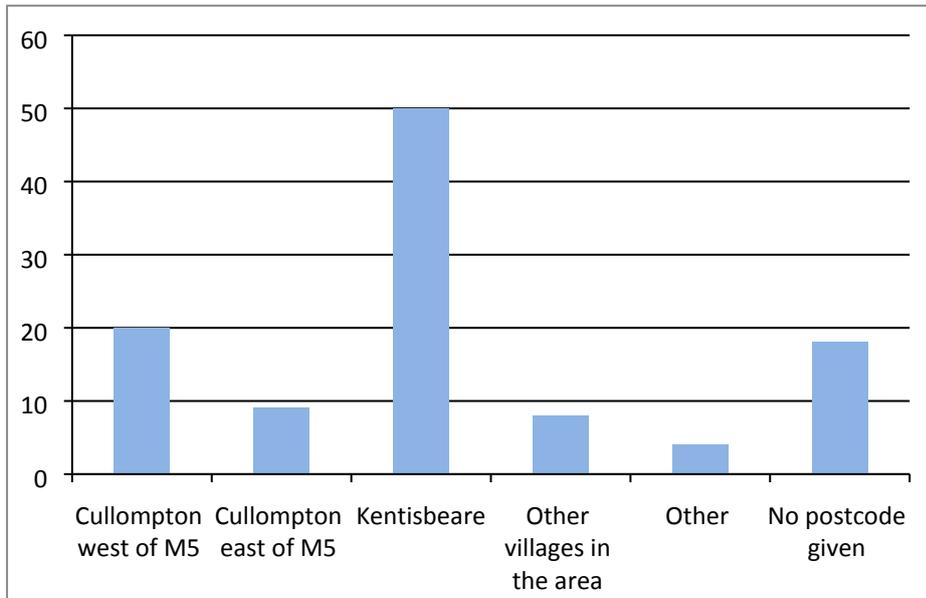
Comments in this section reflected comments earlier in the questionnaire and in the Vision and Concept questionnaire. Some respondents commented that the proposal was too big and should not cross the Kentisbeare Parish boundary, the housing need had not been proven, and there had been no consultation on the principle of the wider garden village.

Comments on the East Cullompton proposals included taking care in locating green space (not under pylons); a focus on providing jobs for people to work locally; providing shops to reduce journeys over the M5; ensuring adequate drainage and sewerage provision; flood risk assessment and natural flood management; good education facilities; and a place designed to promote physical and mental health and

cater for all ages and abilities. Respondents commented that there is no mention of emergency services and policing.

Respondents wanted prioritisation of infrastructure delivery (particularly transport infrastructure), to address current problems with lack of capacity on the roads and lack of facilities in Cullompton. Respondents highlighted the lack of detail in the plans and the proposals and uncertainty over the extent of the wider garden village.

*Q14: Please tell us your postcode*



## **APPENDIX 2: STATUTORY/OTHER CONSULTEE RESPONSES**

Responses from statutory and other consultees, including Town and Parish Councils, are summarised below. The full responses will be published on the Culm Garden Village website. In most cases, a single response from a consultee includes comment on both the consultation documents.

### **1. Highways England**

Through the review of the modelling evidence base for the Mid Devon Local Plan, the nature and scale of improvement required to facilitate access to and from the M5 is understood but the detailed scheme and delivery mechanisms are yet to be defined. Highways England is in agreement that a scheme such as Junction 28a is necessary to accommodate the proposed growth. Highways England will continue to work with the authorities to identify the most appropriate scheme and where required provide support in securing funding for delivery of the scheme.

The purpose of the strategic road network (SRN) is to provide for the safe and reliable long distance movement of people and goods. The promotion of the Garden Village as being well connected to the M5 somewhat contradicts the vision of the Garden Village which will 'focus on providing excellent access to services and jobs within a healthy, well connected and green environment'. Where possible we would expect large development allocations and proposals to be well located in order to reduce the need for day to day reliance on the SRN, particularly for commuting. We would not want to encourage the development of a 'commuting village' on the edge of the SRN. Through the masterplanning and application process we will be working closely with the authorities and applicants to ensure that the development is well connected by sustainable travel modes and well phased in terms of housing, education and employment to reduce the need for peak hour private car trips particularly on the SRN.

The proposal in its current form is considered to alleviate traffic impact on the local road network, and whilst it is noted that a scheme could be delivered to safely facilitate access to and from the M5, it must be recognised that this will be of significant scale and cost with delivery risks.

Highways England is supportive of the current East Cullompton Masterplan and the objective of creating a sustainable community. However, at this stage the Vision and Concept and Masterplan SPD documents are considered to require further refinement and strengthening in order to reduce the need for external travel, particularly by private car and to identify the scale of necessary transport infrastructure in order to manage viability risk. Measures to encourage modal shift are strongly supported, however further emphasis should be placed on the early re-opening of the Cullompton rail station to provide an alternative travel mode.

The Masterplan aspiration for accommodating further dwellings at East Cullompton is noted by Highways England. It is acknowledged that this will lead to an over-capacity situation at M5 Junction 28 and a major intervention will be required in order to accommodate both planned and further aspirational growth in line with the Garden Village status.

It will be essential that the development strikes the appropriate balance between the provision of significant additional housing, employment opportunities and local facilities to create a sustainable new community, and that delivery is phased to match the provision of the necessary transport infrastructure in order to minimise the traffic impact on the strategic road network.

## **2. Environment Agency**

### *Vision & Concept*

We consider that more should be included in respect of water resources and water quality. We recommend that a Water Cycle Study is undertaken to better understand the impact of the development on water resource for the catchment taking into account the impacts of climate change. A Water Cycle Study would also inform how the development can help improve the water environment and determine the most sustainable way for foul effluent from the Garden Village to be managed. We have concerns regarding the sustainability of the proposal to pump sewage to the Willand sewage treatment works.

Flood risk is clearly a constraint in terms of the areas that are not sustainable for built development (except access roads). For the purpose of applying the Sequential and Exception tests, and informing master-planning, the flood zones should include the effects of climate change for the lifetime of the development (i.e. 100 years for residential development). Our Flood Map for Planning does not demonstrate future flood zones so the proposed modelling work would be the best mechanism to determine the effects of climate change.

The impacts of climate change also need to be considered with regard to habitats and species. This should include consideration of whether there is a need for a greater variety of habitats to ensure the habitats and species in and around the new settlement are sufficiently resilient to future climatic conditions. There should be a diverse mosaic of habitat and connections for wildlife. Green infrastructure needs to be multi-functional. We are pleased that at this early stage many of the potential green corridors follow watercourses although we have some concerns about green infrastructure being located beneath the electricity pylons.

The vision should include more about enhancing the environment (i.e. providing net gain) and being resilient to climate change. The emerging 'Connecting the Culm' project will be important. Principles from 'Connecting the Culm' should help inform the nature of the 'countryside' within the CGV. It will be essential that there is a robust and comprehensive evidence base in place to inform delivery of green infrastructure under this principle. For example, hydrological modelling may show that more of the area will be at risk of flooding in 100 years' time.

The floodplain park and connecting green-blue corridors (incorporating SuDS) will play an important part. The parks will be of benefit to residents of Cullompton and the CGV but may also draw people from elsewhere into the area. It will be important that environmental infrastructure such as SuDS is in place early. We are generally supportive of the Concept Plan. Overall it shows a good mix of corridors which respect the landscape setting put the environment first. Nonetheless, it will be

essential that the evidence base is comprehensive to ensure the concepts can become a high quality reality. This should include, amongst other things, water resources planning and flood risk assessment, as well as any off-site improvements that might be necessary.

#### *East Cullompton Masterplan SPD*

Under Section 3 (Understanding the East of Cullompton Site) there are a number of important issues to consider.

Figure 6 shows the Localised Landform. However, it also indicates key green infrastructure both inside and outside of the red line boundary of the allocation. It will be important to build in links from the formal green infrastructure that will be delivered in this first phase within the red line to the wider CGV area.

Figure 7 sets out the Habitat Plan for the area which includes potential floodplain grazing marsh (an important priority habitat for which we are the lead partner). This potential area of grazing marsh needs further clarification. We would want to see protection, enhancement and creation of a variety of habitats to make the area more resilient to pressures such as climate change.

We are aware that there is an area of wet woodland (another important wet priority habitat) at the northwest boundary of the allocation. This is not shown on figure 7. We consider that there is scope to create further wet woodland (i.e. along River Kenn near Week Farm) which would provide both flood risk and habitat enhancement benefits. Wet woodland could provide shade for species, especially fish. Passage of fish species through the area's watercourses will need to be considered as part of the evidence base as will the potential for in-channel improvements. A robust evidence base will be necessary to show how net gain has been achieved.

We have a number of observations with regard to the section on Flooding and Drainage.

In respect of flood risk there is a sizable area of land within the south west area of the area of interest near East Culme House which is at risk of flooding which is not referred to in the document, and should be. In addition, there is land that, whilst not at risk now, may become at risk of flooding as a consequence of climate change.

We note that the intention is for foul drainage to be directed to the Willand Sewage Treatment Works via a pumping station. We will need to understand the reasons why South West Water have stated that this is their preference for sewage disposal from the CGV. Pumping is not a sustainable solution to the long-term management of sewage from a new town, accordingly we have concerns regarding this proposal.

In general we consider that this section should also consider the wider water environment such as water quality and water resources and the impacts of climate change on those matters. We would encourage the SPD to pursue a holistic solution to the challenges faced in the water environment, considering flooding, drainage and water quality together. Getting things right upstream will help to reduce impacts at Cullompton where there are existing issues (i.e. 'Catchment Based Solutions').

With regard to Access and Movement we note that new roads and connections are proposed in the floodplain. These elements of 'essential infrastructure' will need to be resilient, remain operational in times of flood and not result in increases in flood risk elsewhere.

We would recommend that the wider water environment and an integrated catchment based approach for the whole area is considered. This should include waste water treatment and supply.

We consider that the Potential Scope and Content of Final SPD is broadly acceptable. Nonetheless we recommend that Section 2 (Understanding the Site) is supported by a comprehensive evidence base which includes a Level 2 Strategic Flood Risk Assessment, a Water Cycle Study and a Water Framework Directive Assessment. In addition Section 4 (Making the Strategy Work) should refer to Net Gain in the context of the wider water environment.

### **3. Sport England**

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance <http://www.sportengland.org/facilities-planning/planning-for-sport/>.

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.

The quantity of playing fields needs to take into account the existing situation and future needs of the existing population and the needs generated from new homes. Sports pitches should be in accessible locations, within easy reach of the community and be a large multifunctional open area for a number of sports, linked into a green grid and create non car journeys. They should be in areas where there is no risk of flooding or detrimental noise or air pollution, or under electricity pylons.

Sport England recommends that a ground conditions assessment is undertaken by a sports turf specialist/agronomist who can recommend a scheme for preparing the playing fields to the required specification. The recommended scheme should then be implemented. Detailed guidance on the issues that require consideration is set out in Sport England's guidance 'Natural Turf for Sport':

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport>.

The developer(s) will need to ensure that the journey to the pitch sports hub from the site and wider town centre be visible being walking, jogging and cycling friendly. The LTA would want to see tennis involved in the plans going forward. They are currently mapping where their future investment is likely to be directed going forward. Whilst there is a notable amount of club provision around Culm, there is very little community provision.

With regard to the linked proposal for a Cullompton relief road we raise concern over the potential loss of land and/or buildings used for sport and recreation including playing fields. Sport England therefore considers that the road proposal conflicts with our national policy on the loss of sports facilities. Should redevelopment be unavoidable, an equivalent (or better) replacement facility should be provided in a suitable location.

Sport England has no objection in principle to housing growth but recommends that further discussions and amendments are made to the Masterplan and finer detailed designs to take on board the comments above before the final plan is adopted as Council policy. The immediate key missing document is a robust evidence of need for sport and recreation – pitch and non-pitch sports.

Sport England, Active Devon and the NGBs would like to work with the developer to provide exemplar sports facilities and physical activity opportunities for the residents of the Garden Village.

#### **4. Devon and Cornwall Police**

Proposed development of this size will inevitably have an impact on policing and therefore it would be prudent for Devon and Cornwall to explore the possibilities of using Section 106 monies to help fund future infrastructure requirements once these needs are identified.

Designing out crime in the built environment is an effective method of improving the safety, security, and wellbeing of those who live, work and visit Mid Devon. Liaison with the police Designing Out Crime Officer (DOCO) regarding crime prevention through environmental design (CPTED) at the earliest stage of the planning process

will help ensure new communities are safe, secure and sustainable. The DOCO will look to ensure the following elements are considered and incorporated into the design of future developments:

Access and movement - places with quality connections and well-defined routes, that provide convenient movement without compromising security

Structure – encouraging ‘active frontages’ and limiting access to private space

Surveillance – encouraging overlooking of public spaces by those who will take action should a crime be committed

Ownership – clearly defining where public space ends and private space begins and encouraging people to take ownership of their environment

Physical protection – ensuring buildings include appropriate physical measures to prevent crime

Activity – ensuring the level of human activity is appropriate to the location to reduce the risk of crime and increase perceptions of public safety

Management and maintenance – discouraging disorder by creating places that are well looked after with minimum cost implications.

Designing out crime also impacts on the sustainability of developments.

Sustainability is not just about energy use but also includes creating developments which are less likely to suffer high levels of crime. Considering design principles at an early stage can help improve feelings of safety and security, not only for new residents but those who already have homes in the area. Therefore, can consideration be given to the principles and practices of Crime Prevention Through Environmental Design (CPTED) in designing out crime, disorder, anti-social behaviour (ASB) and community conflict within the built environment and be incorporated into the future plans for Culm Garden Village. It is also requested that the DOCO be involved in the review of any designs at the earliest possible stage.

As with many new developments in Devon, the good intention of encouraging residents and their visitors to walk, cycle or use public transport is fully supported but in reality it appears that the owning of a private vehicle continues to be the preferred method of transport. But by failing to recognise this at the design and layout stage is now providing ever increasing visual evidence of how a lack of sufficient and practical parking is having an adverse effect on quality of life issues for residents of some new development.

## **5. Devon County Council**

### ***Local transport provision***

As the Highways Authority, Devon County Council has been engaged throughout the preparation of the Local Plan Review on the transport requirements associated with this site. We have also been engaged on transport matters through the design review process undertaken so far for the whole site and will continue in this role going forward.

The preparation of a sustainable and holistic transport strategy will be fundamental to ensure development impacts at the Garden Village are managed and mitigated in an appropriate manner. As such we welcome the identification of “A well connected

and integrated new place” as one of the nine key principles for the garden village. It is necessary to develop a holistic transport strategy for the Garden Village which appropriately considers all modes. Fundamentally it should address the need for strategic junction improvements, provide attractive and integrated public transport links and facilitate high levels of walking and cycling across the site and into the existing town. Attractive routes will also need to link to the train station.

In relation to buses, there is no mention of the bus route which connects Tiverton, Cullompton and Exeter which is surprising given the reference to the smaller town services and the Falcon service. The bus strategy should be agreed with Stagecoach who have been to initial Garden Village workshops and should be included going forward.

A key principle for the East Cullompton allocation and wider Garden Village is for walkable neighbourhoods and permeability for non-car modes. It is stated that “Segregated pedestrian and cycle paths over the M5 will be explored.” Consideration should be given to the need for more than one crossing point of the M5, one of which could be an attractive, direct, standalone route. This provision should be explored in the context of the potential to adapt existing crossings or delivering a new bridge. Such discussions will need to take place as part of a wider transport strategy for the allocation and should not preclude the delivery of appropriate strategic junction improvements. The transport strategy should also encourage the use of electric vehicles and the use of shared mobility, i.e. car and cycle clubs.

Honiton Road will play an important role both in terms of transport functionality and place making and as such a holistic strategy will be required. The draft Masterplan identifies Honiton Road as a strategic highway link in the Access and Movement plan (Figure 14) on page 28, with new junctions providing key connections to the wider site’s internal layout. The principle of linking roads into Kingsmill Industrial Estate is supported but the contact point suggested in the diagram on page 28 is not consistent with the comments on page 22. There are currently two options for the potential strategic motorway access solution, one as shown in Figure 14 and the second being a major intervention at the existing junction 28. A decision has not been made on the final option at this stage but if the latter option is pursued, a strategic link between junction 28 and Honiton Road through the CU17 proposed allocation and the adjacent land identified for green infrastructure will be required. The document and associated plans should be updated to reflect this position.

### ***Education Provision***

Education facilities are widely regarded as forming a fundamental part of any community and can provide a hub for other community activities. As such there is a critical need to ensure appropriate pupil places are planned for as part of the Garden Village. The development of 5,000 homes will require new education facilities including both primary and secondary provision. This scale of development can be expected to yield 1,250 primary aged pupils and 750 secondary aged pupils.

The concept proposals plan on page 32 of the Vision document indicates one “potential primary school” within the Mid Devon Local Plan proposed allocation boundary. It is envisaged that this primary school will be a 3-form entry school,

offering 630 places. It should be noted however that the final education strategy for the proposed Local Plan Review allocation is yet to be determined. All new primary schools should incorporate appropriate early years provision and a children's centre service delivery base.

The education strategy outlined on page 31 of the Masterplan SPD document is consistent with what has been put forward through the Mid Devon Local Plan review. As stated in the document, there are currently two potential scenarios identified for primary provision. The County Council accepts both scenarios, but it should be noted that there are cost implications of delivering the two-school option. All new primary schools should incorporate appropriate early years provision and a children's centre service delivery base. All development will be required to contribute to the delivery of the primary provision on site.

We can confirm that whichever scenario is pursued, primary school provision will need to be available as part of the first phase of development. Due to existing schools within the town forecasted to be at capacity and other primary schools not considered to be within safe statutory walking distance, it will be necessary for the new primary school to be open upon occupation of the first dwelling. In order to achieve this within a timely manner it will be necessary to identify and agree detailed triggers for key stages in the school's development as part of the legal agreement for the site. We note that it is intended for the next version of the Masterplan SPD to include information about implementation and phasing for infrastructure and we can provide further details to inform this section of the masterplan with regard to primary school delivery. The school/first school should be located accordingly within the development to facilitate early delivery and have road frontage to support this.

With regard to secondary education, the draft masterplan correctly identifies that around 390 secondary aged pupils are expected to be generated as a result of this development (the full 2,600 dwellings). Devon County Council has undertaken design work to establish how Cullompton Community College can be expanded from a 5 form entry to 8 form entry secondary school to accommodate this growth in pupils. Developer contributions will be required to fund the necessary expansion. The draft masterplan indicates that the emerging access and movement concepts for the site can enable safe and convenient walking and cycling routes across Honiton Road and the M5. This is fundamental to for the County Council to accept the proposed secondary education strategy.

In order to accommodate secondary aged pupils across the wider Garden Village site (5,000 dwellings), a new secondary school is proposed as part of an all through education campus. Consideration should be given to bringing the delivery of the new secondary school campus forward earlier in the development phasing if the development of the Garden Village is accelerated. This will minimise the potential capital outlay of additional provision in the existing town. For the new secondary school to be educationally sustainable it will require all children living in the garden village to attend.

1.5% of school aged children will have special educational needs (SEN). It is envisaged that a new SEN school will be provided as part of the wider garden village

proposal. This could be provided alongside primary and secondary provision on site, potentially as part of a wider education campus.

### ***Waste Disposal***

In the development of the Local Plan Review, Devon County Council outlined the requirement for a new recycling centre to serve Tiverton, Cullompton and Willand. At the Local Plan Review examination hearings in February 2019 it was agreed that relevant policies, including CU10 (East Cullompton Community Facilities) and CU20 (Cullompton Facilities), would be updated to include reference to a new recycling centre and the need for development to contribute financially towards its delivery.

A site for the new recycling centre is yet to be identified although the County Council is proactively looking for a potential site. We would welcome the opportunity to discuss the potential for locating this facility within the East Cullompton allocation, or indeed the wider Garden Village, ideally within an appropriate part of the employment area. The site would need to be approximately 1.2 hectares and have good road access. It should be noted that the strategy for the new recycling centre is fluid and we are currently also considering the potential need for a second new facility in the area at Tiverton.

### ***Waste Planning***

The need for the development to be masterplanned in a way which enables sustainable waste management is not referred to in the draft SPD and this should be addressed in future iterations of the document. We would expect sustainable waste management to feature within at least one of the 9 key principles set out for the wider Garden Village on pages 10-11. It is important that the layout and design of the site provides adequate space for waste storage and promotes opportunities for waste to be managed as far up the waste hierarchy as possible.

### ***Historic environment***

The Vision and Concept document acknowledges that heritage is a theme which is important to a number of the Garden Village principles and their associated objectives. This includes the principle of being locally distinctive with well-designed neighbourhoods and places; being community focused; and providing great homes. The document focuses upon how heritage can influence building design and create a sense of place.

The document could provide more focus upon heritage assets forming part of green infrastructure and informing the site's layout. To achieve this, investigative work is required which looks more holistically at different types of heritage assets likely to be in the area. Without this work, opportunities may be missed to maximise the potential for heritage assets to form part of green infrastructure and inform the site's layout.

Both the Culm Garden Village and the East of Cullompton Allocation sites occupy large areas within a landscape known to contain evidence of prehistoric and Roman activity, the modern town of Cullompton to the west contains evidence of prehistoric

as well as Roman military and civilian settlement - including a Roman military fort. The surrounding landscape also contains evidence of activity from these periods too, while the current field system and farm landscape here dates to the later medieval and post medieval periods.

To the east there is evidence of Roman iron working as well as place names such as 'Orway' and Stoneyford' that could indicate the presence of a Roman road between the settlement at Cullompton and the iron ore extraction industry operating up on the Blackdown Hills. As such, there is the potential for this landscape to contain evidence of prehistoric and Roman activity in the form of buried archaeological and artefactual deposits. However, the Historic Environment Team is unaware of any formal archaeological investigation being undertaken in this area.

In the absence of information on the archaeological significance of any heritage assets with archaeological interest that may be present and affected by the proposed development, the County Historic Environment Team would advise that future iterations of the Masterplan should be supported and informed by the results of a programme of archaeological work, consisting of:

- (i) geophysical survey of the site followed by
- (ii) field evaluation of the site to understand the significance of any heritage assets identified by the survey and test the efficacy of the survey itself.

The results of this work may influence layout of the development as well as Green Infrastructure within the developments. Finally, it would be helpful to explain how the heritage setting areas associated with the listed buildings have been defined.

### ***Surface Water Flooding***

The Vision and Concept document appropriately incorporates the need for sustainable drainage systems and embeds this requirement within two of the objectives, and recognises the role sustainable drainages systems can play in relation to green infrastructure and open space. This approach is supported.

It is also noted that surface water management will form part of the Masterplan SPD for the first phase of the Garden Village. This is a sensible approach and should ensure that surface water management is considered at an early stage and that areas are allocated for sustainable drainage features. The document generally considers the presence of Flood Zones 2 and 3 and would benefit from a wider consideration of all local flood risk, such as surface water and groundwater flooding.

The risk of flooding from surface water map has been developed for Devon to inform where there is surface water flood risk. This dataset indicates the surface water data that best represents local conditions and was reviewed, discussed and agreed between the LLFA, Environment Agency and other local partners. It should be used alongside the existing Environment Agency Flood Zone Maps by Local Planning Authorities in the planning process, assessing flood risk and reducing the potential risk from any new developments.

Sufficient space should be set aside within the masterplan for above ground attenuation features, as part of a wider sustainable urban drainage strategy (SuDS), which should be designed to be sympathetic to the landscape as well as biodiversity. The hydraulic modelling of the existing watercourses and drainage network will be crucial and we look forward to seeing the results of this study. It would be useful for infiltration testing and groundwater monitoring to be considered at an early stage in the design process which will aid the design of the surface water drainage network. We can provide further information and advice on this if necessary.

Since this scheme is 'landscape led' it would be beneficial to provide 'green/blue corridors' for wildlife and surface water/watercourses within the development to increase the amenity within the area.

In terms of detailed comments, Figure 4 on page 9 of the document does not clearly display the extent of flood zone 2 and 3. The plans should be updated to be clearer. In relation to the Flooding and Drainage section of the document on page 20, the 3rd paragraph which currently refers to "nature based solutions" should be amended to read "Natural Flood Management based solutions".

### ***Health and wellbeing***

We support the key principle of creating a healthy living environment and welcome the Masterplan's inclusion of opportunities for residents and visitors to use green and blue infrastructure. Outdoor usable space is vital for physical, mental and social health and wellbeing. Attractive walking and cycle routes will promote active and recreational travel while open space in general provides opportunities for many groups to enjoy leisure activities for the benefit of wellbeing.

The local centre(s) should be located near to an area of housing and be walkable for the local population. The uses should be based on the needs of the local population. Community facilities that encourage people to interact include spaces such as libraries, cafés, community centres and public spaces for groups to meet in. This will support the establishment of a local community. In relation to question 8, managing facilities will require resources and will provide an opportunity for local people to improve skills. Promoting opportunities for local residents to volunteer their time will also create opportunities for community cohesion and skill development. In terms of funding required to maintain facilities, further thought will be required over the long-term stewardship arrangements of the development.

In terms of health care provision, an assessment of health and care need would be required for the population, involving primary care, secondary care, mental health, public health nursing and pharmacy. Any services should be appropriate to the needs of the population and in should support positive health and wellbeing messages, e.g. active travel, physical activity, healthy food etc.

### ***Economy and Enterprise***

In order to create a sustainable community at the Garden Village it is necessary to ensure the development of homes is coupled with the provision of jobs and employment space. This requirement has been included within the Vision and

Concept document and this is supported. We welcome the inclusion of “Ambitious employment opportunities,” as a key principle. We strongly support the concept of providing good quality employment in a high-quality environment. Design should be innovative as this will be essential to attract new and business to the area. There needs to be a mix of well-designed premises with good internet connectivity which should include work-hubs.

### ***GP Provision: Response of the new Devon Clinical Commissioning Group***

In light of the substantial population increase which would arise as a result of these proposals, the CCG is discussing how services will be provided for this area. At the current time, no decision has been made about whether to increase capacity at existing facilities or to seek a new facility to cover the development. An existing provider of primary medical services in Cullompton has also expressed their concern regarding the level of population growth in the area at a time where recruiting GPs poses significant challenge. The CCG will continue to feed in to the development plans and work jointly with its partner organisations. Following the emergence of an appropriate strategy based on robust evidence, it is likely that developer contributions will be sought towards appropriate provision to allow for increased healthcare capacity in the area.

## **6. Natural England**

The vision statement appears to promote high quality and multifunctional green infrastructure. Natural England’s Green Infrastructure Guidance provides an introduction to delivering green infrastructure at the micro and neighbourhood scale through features such as street trees, green facades and green roofs, where consistent with the local character. These features can be extremely important in increasing ecological connectivity between green spaces, particularly when footpaths and green corridors are not feasible.

Natural England also encourages any proposal to incorporate measures to help improve people’s access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Natural England recognises that climate change is the single biggest threat to the natural environment. Improving energy efficiency is the most efficient mitigation measure to reduce greenhouse emissions and therefore conserve and enhance the natural environment. Natural England welcomes any proposal for sustainable building design which should also give consideration to passive ventilation, solar orientation etc. to reduce demand.

We note from the masterplan maps that the proposed green corridors run mostly along the lines of existing hedgerows. These corridors appear to be a significant width in the masterplan which would provide robust corridors that will provide significant benefits to the garden village community as well as wildlife. We

recommend that you substantiate these proposals in the design of the garden village. There may additionally be significant opportunities to include green infrastructure in urban environments such as green roof systems and roof gardens; green walls to provide insulation or shading and cooling; new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to habitat connectivity, the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".

You may wish to consider providing guidance on strategic net gain to be provided and/or guidance on individual development sites throughout the area, such as the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. There are several examples of good practice where LPAs are making progress with delivering net gain and Natural England would be happy to advise further. We welcome that you first considered what existing environmental features on and around the site can be retained or enhanced before considering what new features could be incorporated into the development proposal.

Biodiversity metrics are available to assist developers and local authorities in calculating and securing biodiversity net gain. Local Authorities can set their own net gain thresholds but Natural England would currently expect a minimum of 5% net gain and LPAs should aim to negotiate upwards of this.

To preserve the wider landscape character of the area, the master plan should recognise and give appropriate consideration to the impact of the village design on the Blackdown Hills Area of Outstanding Natural Beauty (AONB).

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

The Institute of Lighting Professionals has produced practical guidance on considering the impact on bats when designing lighting schemes - Guidance Note 8 Bats and Artificial Lighting. They have partnered with the Bat Conservation Trust and ecological consultants to write this document on avoiding or reducing the harmful effects which artificial lighting may have on bats and their habitats.

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. SPDs should be

considered as a plan under the Habitats Regulations in the same way as any other plan or project.

## **7. NHS Royal Devon and Exeter Hospital**

During 2017/18, the equivalent of 79,644 residents of Exeter and East and Mid Devon attended the Trust's A&E Department and 88,346 of Exeter and East and Mid Devon residents were admitted to Hospital. In addition to this, the equivalent of more than every resident attended an outpatient appointment and 206,744 uses of the Community Health Services were made by Exeter and East and Mid Devon residents. This is equivalent to the average Exeter and East and Mid Devon resident generating 2.1 acute hospital interventions per year at the Royal Devon and Exeter NHS Foundation Trust (see Appendix 2 for 2017/18 Activity % by Local Authority Area).

There is no way to reclaim any additional cost for unanticipated activity within Devon. The only way that the Trust can maintain the "on time" service delivery without delay and comply with NHS quality, constitutional and regulatory requirements is through developer funding the gap directly created by the development population. Without securing such contributions, the Trust will have no funding to meet healthcare demand arising from the development during the first year of occupation. Without the contribution, the health care provided by the Trust would be significantly delayed and compromised, putting the residents and other local people at potential risk.

A development of up to 5,000 dwellings equates 12,804 new residents (based on the current assumption of 2.56 persons per dwelling as per ONS figures). Using existing 20164 demographic data as detailed in the calculations in Appendix 5 will generate 25,728.72 acute interventions over the period of 12 months.

As a consequence of the above and due to the payment mechanisms and constitutional and regulatory requirements the Trust is subject to, it is necessary that the developer contributes towards the cost of providing capacity for the Trust to maintain service delivery during the first year of occupation of each unit of the accommodation on/in the development. Without securing such contributions, the Trust would be unable to support the proposals and would object to the application because of the direct and adverse impact of it on the delivery of health care in the Trust's area. The contribution required for this proposed development is £7,286,583.

Having considered the cost projections, and phasing of capacity delivery we require for this development it is necessary that the Trust receives 100% of the above figure prior to implementation of the planning permission for the development. This will help us to ensure that the required level of service provision is delivered in a timely manner. Failure to access this additional funding will put significant additional pressure on the current service capacity leading to increased delays for patients and dissatisfaction with NHS services.

## **8. South West Water**

South West Water has no comment at this time other than to confirm initial discussions have been held regarding the provision of public foul drainage and mains water to serve the new village.

## **9. East Devon District Council**

We note that the initial phases of the proposed development align with policy of the emerging Mid Devon Local Plan and we would endorse policy compliant development as the scheme proceeds. In this context we would also highlight the importance of alignment of the overall development with the policies of the Greater Exeter Strategic Plan as it develops and starts to take formal shape.

As you will be aware the proposed development falls in open countryside and at its nearest point suggested built development lies around one kilometre from the East Devon District Council boundary. We are, therefore, specifically interested in cross-boundary issues and relationships across the two local authority areas and the towns and countryside areas that surround and are close to the proposed development area. As you will be aware the main road between Cullompton and Honiton (the A373) is of variable quality and whilst we recognise that Devon County Council, as Highway Authority, will take a particular interest in highway matters we would stress the importance of ensuring that this road, in particular, is fit for purpose to support the development and development you propose not compromise scope for building elsewhere.

A preliminary overview does not reveal designated nature conservation or heritage assets in East Devon in close proximity of the potential area for development but we would stress the importance of careful assessment of potential impacts on designated and non-designated assets as planning work progresses. This consideration, of course, applies to assets on both sides of the District Council boundaries and as you will appreciate we do jointly share an outstanding environment in this part of Devon with, for example, the Blackdown Hills Area of Outstanding Natural Beauty just four kilometres away from the area identified with potential for development.

## **10. Cullompton Town Council**

### ***Vision & Concept***

Name: "Cullompton Garden Village" as the majority of the proposal is located inside Cullompton Parish and Cullompton Town Council and the Neighbourhood Plan have been working for many years for homes in East Cullompton.

Other significant constraints or opportunities: road infrastructure, sewerage, flooding and pylons, business links, sports facilities. The map on Pages 7 and 9 does not include the road bridge at Old Hill and Duke Street and there is concern that there is no alternative crossing of the M5, main line railway and the River Culm.

Objective f (Page 15) should list the countryside park and sports zone as specific topics that should be delivered in Phase 1 of the development.

Cullompton Town Council have been asking for provision of a bus station as a key transport interchange in Cullompton and yet there is no mention of it. There will also be a need for significant parking at a reopened railway station.

No reference to countryside park alongside the River Culm between the river and Kingsmill Industrial Estate, no reference to flooding major works, lakes etc. needed on River Culm to mitigate flooding.

Kingsmill Industrial Estate desperately needs a new LGV suitable road behind Mole Valley Farmers to Honiton Road to remove the log jam of LGV traffic at the junction of Honiton Road and Kingsmill Industrial Estate to Junction 28. The region around Old Hill and Duke Street motorway bridge must be included.

Cycle paths are essential but there needs to be a safe pedestrian and cycle route over the M5 motorway leading to: Cullompton Community College, town centre, connecting east and west Cullompton, from J28 to Willand alongside River Culm connecting to National Cycle Route in Willand to give national cycle connections.

Active lifestyles do not refer to Sport England's demands that sports facilities are expanded and improved. Who will take on the management and ongoing revenue costs of community buildings?

There is no discussion surrounding additional medical facilities, such as GP Surgeries. The existing facilities do not have the capacity to cater to a town that will be twice the size that it is now.

The addition of suitable accommodation of an ageing population (such as bungalows) and a bus on a circular route to link east and west Cullompton via GP Surgeries, schools and transportation links in order to maximise safety and minimise car usage.

Infrastructure and sporting facilities should be prioritised in the first phase of development.

The responsibility for ongoing capital and maintenance costs should be established in advance.

Accessibility to community facilities will be a key aspect.

How will the community at large be engaged?

There is no mention of bungalows for an ageing population or "homes for life". There is no mention of accessible homes with reference to RNIB and Design Council planning guidance. There is no mention of the weathering of exterior finishes of buildings and damp as reported in other large, modern and local developments.

There needs to be a larger allocation of land for business use and business and employment opportunities should receive more emphasis.

There should be a “green zone” between Horn Road and Dead Lane that contains: a secondary school, the Cricket Club, the Rugby Club and high quality, up market 4-6 bedroomed dwellings.

The Countryside Park and potential for cycle paths along the River Culm are not shown. There is significant concern that the proposed sport and leisure facilities will not be addressed until Phase 2 which may be 10-20 years into the future.

Principles should be increased to ten. Countryside principle should remain but sport and leisure should become principles in their own right.

### ***Masterplan SPD***

The green and blue infrastructure should provide: countryside park of c110 acres along River Culm, lakes for water retention used for a water park, relocate Cullompton Cricket Club and provide a County Cricket ground, site for a secondary school (or “all through” school), Sports Zone – hockey, archery, indoor shooting, outdoor bowls, tennis, Multi Use Games Area, relocate Cullompton Rugby Football Club, larger play areas with 5-a-side football and basketball in place of many small play parks.

A local centre will definitely be required in one of the following locations: with easy access from the M5 on the roadside on Honiton Road between Junction 28 and a new Junction 28A, in the area in the vicinity of the existing Mole Valley Farmers.

Provide lots of large bungalows for the elderly ideally situated in small cul-de-sacs that make walking safe. Pay attention to RNIB Building Guide and the Design Council’s Wheelchair Access housing guide. Do not provide small/starter homes.

Cullompton Town Council for some facilities; sports clubs e.g. cricket and rugby, St Andrew’s Church; YMCA could manage community facilities.

All types of employment should be provided. Smart and sustainable development should provide high speed broadband, solar panels, energy efficient buildings, roofs with wide eaves for shade in summer and rain protection.

Start as quickly as possible. The Road Infrastructure is key, particularly Junction 28/28A and Cullompton Relief Road. Key questions relate to the road infrastructure and time. Questions relate to flooding, sanitation, drains etc.; timing of sport and leisure facilities, parks and amenities for young people that are not sport related; timing of building of schools, doctors’ surgeries, shopping plazas etc.

There is a need for care in locating green infrastructure with such pylons and escarpments that will make the green space less usable. There needs to be better planning for being offices, business and commerce in order that local people can work locally. The proposed secondary school needs to be located within the Cullompton Parish boundary.

## **11. Kentisbeare Parish Council**

### ***Vision & Concept***

The Garden Village should take into account the sensitivities of, and rural nature of the villages in its vicinity. Kentisbeare Parish boundary should be clearly marked in all documents throughout the masterplanning process.

The existing junction 28 is not capable of dealing with the traffic arising from the Garden Village plans. The A373 has become significantly busier in the last couple of years. Also to date, no proper catchment based flood study has been undertaken, although it has been promised. It is not enough to describe issues like this as opportunities. Real infrastructure delivery on all three issues needs to take place before significant quantities of housing are built.

We feel that there has been no attempt to justify the size of the Garden Village and that the proposal is too big. A green buffer with Kentisbeare should be inside the Cullompton Parish boundary. In addition, we are concerned that affordable housing percentages must not be traded away, and we feel there is insufficient detail or acknowledgement that renewable energy technologies should be a crucial aspect of all housebuilding in the new scheme. As with the Local Plan, there is nowhere near enough detail on the flood risks this scheme will create, and there needs to be particular care and attention to the sizing, placement operation and maintenance of SuDs schemes to mitigate surface water run-off.

We would like to see a good range of skill-based businesses and not just basic service jobs. We would also like to see good links to the surrounding areas – e.g. connecting paths and an upgrade to the A373. We would like the development to reflect local architecture.

The green buffer area between the Garden Village and Kentisbeare should be inside the existing Cullompton Parish boundary. If it is to be an effective buffer zone, it should disguise the scale of the building from the rural areas beyond. That might suggest the planting of new woods or similar, such as coppiced woodlands that would generate an income. We do not believe that sports pitches fulfil that function. Within the buffer zone, property owners should retain their existing rights in terms of development. We would encourage footpaths and cycle/bridleways through the buffer zone. Kentisbeare Parish Council would be looking to secure this area as designated Local Green Space in any Neighbourhood Plan.

The Garden Village seems excessively large, as does the allocation of housing to east Cullompton in the Local Plan. This consultation should be asking for local residents' views as to whether they want a Garden Village at all, not presupposing their approval.

### ***Masterplan SPD***

Plans for east Cullompton continue to ignore all issues to do with the A373 to Honiton. This road needs addressing too. There is also no mention of the flooding issues in the area. There should be no large scale development until this has been

studied thoroughly, and recommendations from a full catchment based study implemented. There is no mention of sustainable drainage systems.

The undergrounding of power lines should take place where it is economically feasible to do so.

The transport network depicts the hoped for reopening of Cullompton railway station, which appears unlikely from comments elsewhere. Infrastructure needs prior delivery. MDDC continue to ignore the resultant transport problems which will be created to the east, notably the inadequate condition of the A373 to Honiton. The map on page 27 shows a “potential formal green infrastructure node” to the east of Dead Lane, representing the relocation of Cullompton Rugby Club. This is not connected to the development of the Garden Village and should be part of a separate process.

Community buildings should be multimodal, particularly churches with reference to acts of worship. We would like to see a good proportion of homes available for local people, together with high quality housing association homes. Priority should be given to local people on the waiting list with reference to social housing.

Offices should be of a high quality design. There are already adequate industrial units within this area, and there should be no further requirement, as it is really important to try and attract high skilled and high salaried jobs, rather than see these jobs being created in Exeter and Taunton. Consideration should be given to flexible co-working spaces (of high quality) to attract high growth and scale-up businesses in the digital economy, new disruptive technologies like artificial intelligence and 3D printing and materials engineering. Agree with SMART and sustainable development.

The allocation is far too big and relies on a considerably overinflated Objective Housing Need, and an ignoring of the regular emergence of windfall sites around Mid Devon. We are greatly concerned that the GESP allocations may override/overtake the Garden Village Plan.

## **12. Bradninch Town Council**

Bradninch Town Council discussed the proposals for the Culm Garden Village in Cullompton at their March Council meeting last week.

Concerns were expressed regarding the capacity of existing hospital facilities and whether these would be able to cope with the additional numbers of patients generated by this large development. Concerns were also expressed about the effects on the existing motorway junction (Jct 28) and its ability to cope with increases in traffic, particularly at busy times and specifically during the morning rush hour.

The Council feel strongly that improvements to Jct 28, health facilities, local roads and public transport provision (as well as other infrastructure and amenities) need to be in place before the garden village is built. The Council also have concerns regarding increased traffic and pollution levels within new and existing residential

areas and the effects on the health of residents, particularly children. The potential increase in run-off and its impact on flooding levels locally were also an issue that was discussed. The Council hope that the developers will be working closely with local groups including 'Connecting the Culm' in this regard.

**CABINET**  
**30<sup>TH</sup> MAY 2019**

## **REPORT OF THE HEAD OF PLANNING, ECONOMY AND REGENERATION**

### **HOUSING INFRASTRUCTURE FUND: FUNDING AGREEMENTS WITH HOMES ENGLAND**

**Cabinet Member** \*\*\*\*\*  
**Responsible Officer** Mrs Jenny Clifford, Head of Planning, Economy and Regeneration

**Reason for Report:** To update Members on the progress of discussions with Homes England over the Council's two applications for funding under the Housing Infrastructure Fund (HIF) totalling £18.2 million, to seek authority to enter into grant funding agreements with Homes England over these funds and to seek authority for the Council to forward fund the two infrastructure projects in question.

#### **RECOMMENDATION: That Cabinet agree to:**

- 1. Enter into grant funding agreements with Homes England to secure £18.2 million Housing Infrastructure Fund monies and grant delegated authority to the Section 151 Officer in consultation with the Group Manager for Legal Services to finalise and sign the agreements;**
- 2. Forward fund the Cullompton town centre relief road and Tiverton Eastern Urban Extension phase 2 junction projects as set out in paragraphs 5.1 and 5.4 including taking out any associated borrowing.**

**Relationship to Corporate Plan:** These infrastructure projects are considered vital to enable development identified in the local plan to come forward and make a valuable contribution to delivering the priorities of the Corporate Plan 2016 to 2020; Economy, Homes, Community and Environment.

**Financial Implications:** The Housing Infrastructure Fund will play a pivotal role in bringing forward the corporate aspirations to facilitate growth within the district which in turn will help boost the economy. As grant to be recycled locally, this decision report will secure £18.2m for investment in infrastructure in Mid Devon.

At the outset of the bid process it was envisaged that no additional contributions from the District Council were required over and above those already reflected in existing budgets. However as the discussions with Homes England have progressed and the formal offer letters for the schemes have been received, it is clear that an element of forward funding (cash flow) from this Council will be needed to provide funding for the projects. This is for two reasons:

1. The grant funding agreements with Homes England for each project specifies that the HIF funds will be drawn down in accordance with a programme of payments that has been agreed with Homes England. Whilst these payment claims are programmed by quarter and can be in advance of spend, it is still possible that the Council will be required to bear project costs in the short term until the quarterly HIF draw down payment is claimed and made.

2. Funds are being made available through the HIF programme on the basis of a recoverable grant. Through the terms of the grant funding agreements to be entered into between the Council and Homes England, the Council will be required to use all reasonable but commercially prudent endeavours to secure the recovery of the HIF funding from housing developers. It is envisaged that this will be via S106 agreements to be entered into as part of the planning process. This is to ensure that public funds are not subsidising developer profit. There will therefore be a time lag between when monies needed to be expended in order to deliver the infrastructure and the recovery of funding from developers via S106 agreement. For the Cullompton relief road project in particular the overall project is expected to cost £15m, with £10m forward funding being provided through HIF. The £5m balance required to deliver the project will need to be forward funded by the Council until such time as S106 monies are collected from the housing development that is unlocked by the provision of the road.

The forward funding of monies for delivery of these projects by the Council is expected to be achieved through utilisation of the Council's existing financial resources and/or taking a loan via the Public Works Loan Board and will be reflected in the capital programme.

Any interest charges accrued in the forward-financing of infrastructure will be clawed-back through s106 arrangements. The financial risk to the council is one of phasing to deliver the infrastructure up front for residents' benefit, the anticipated net cost to the council is zero.

**Legal Implications:** This report considers the grant funding agreements for the HIF funding that will be required for each project, to be entered into between the Council and Homes England. The Council will be the accountable body for the projects. The contents of these grant funding agreements have been considered by the Group Manager for Legal Services and at the time of writing this report the project specific contents of the agreements are still under discussion with Homes England.

As required by Homes England, the Council has gained specialist state aid legal advice for each project. This advice has not raised any concerns.

It is proposed that Devon County Council will act as this Council's delivery partner. Given that the two HIF projects involve highway infrastructure, it is appropriate that the County Council as Highway Authority takes on the responsibility for their project managing, procuring, contracting and delivery. A formal agreement will be required between the two councils to this effect and to ensure compliance with the requirements of the HIF funding agreements.

A further area of legal implication is pursuance of S106 legal agreements as part of the planning process in order to secure developer contributions towards the cost of the delivery of the infrastructure in question. It is through this means that the Council proposes to recover the HIF funds as required by the grant funding agreements. Entering into S106 agreements in this way is a standard requirement and would have been sought irrespective of whether this HIF funding was forthcoming or not.

Legal implications will also arise as a result of the need to assemble and acquire land to deliver the Cullompton relief road scheme and also in respect of the legal

interests of existing sports providers likely to be affected and the loss of public open space. There are a range of land ownerships and interests that will need to be addressed and be the subject of negotiation as the project progresses. It is understood that the Cullompton Community Association Fields are subject to a charitable trust for recreational purposes. For the Tiverton A361 junction project, legal provisions for licenses and title transfer between the landowner and Devon County Council are already set out within a signed S106 agreement.

The adoption and implementation of an Air Quality Action Plan (where an authority has designated one or more Air Quality Management Areas) is a statutory requirement under Part IV of the Environment Act 1995 for Local Air Quality Management (known as the LAQM regime). Under the regime, Local Authorities have a duty to pursue measures which are designed to improve air quality. The Council's Air Quality Action Plan includes the delivery of a Cullompton town centre relief road as an air quality mitigation measure, specifically due to the opportunity it provides to take traffic away from the High St which, as well as improving air quality in the vicinity, will also allow a future opportunity for the considered regeneration of the historic town settlement.

**Risk Assessment:** The consequences to the authority of not securing an adequate funding package for the infrastructure in question is serious as it could compromise the ability to deliver much needed housing and affect housing land supply. The Council is also currently at examination over the Local Plan Review. The Inspector will wish to be assured that the Plan is sound and provides deliverable housing sites in the early years of the Plan together with a supply of developable sites later in the Plan with a reasonable prospect of being developed at the point envisaged. It is therefore important that these key pieces of infrastructure come forward and HIF funding is a way by which they may be forwarded funded.

To qualify for funding, the proposed infrastructure will need to meet the HIF scheme criteria and deliverables. There has been significant contact with Homes England as part of the due diligence assessment process. This resulted in the issue of HIF offer letters. In order to meet fund timescales, work streams and expenditure have needed to commence. Until agreements are signed, all work to date is taking place at risk. The aspiration for the delivery of a relief road for Cullompton is long standing and as such, all work currently being undertaken to progress the project is not abortive as it forms part of more extensive infrastructure necessary to deliver the growth planned within the Cullompton area in the longer term including the garden village. The current HIF funding opportunity represents the best chance for it to be achieved in the short term and will require adherence to tight and challenging timescales. S106 funds collected to improve air quality in Cullompton and for the relief road scheme itself have been utilised to date, supporting the County Council's ongoing work to draw up and submit a planning application.

The need to meet agreed project milestones and the fund availability cut off dates remain a significant risk. The offer letters from Homes England were received approximately a year after the Ministerial announcement of the success of both projects under the fund. This delay and associated uncertainty has increased the risk of being able to deliver both projects within timescales that are acceptable to Homes England. At the time of writing this report the key milestones and target dates to be included within the agreements are matters under discussion with Homes England. Close liaison has taken place with the County Council with the aim of ensuring that

the programme and hence milestones for both schemes whilst ambitious (to reflect the urgency of Homes England) is nevertheless achievable. The grant agreement contains fund clawback provisions. Officers from both Councils will continue to work to de-risk the projects, liaise with Homes England and seek their delivery in accordance with the grant agreements. It should be noted that this does not prejudice or predetermine the assessment and decision making process on the future planning application for the Cullompton relief road project.

The risks associated with the Tiverton A361 junction project is considered less than with Cullompton as planning permission has already been granted and a signed S106 is in place between the landowner and County Council over licenses and land transfer.

There are particular risks with the Cullompton relief road project. These reflect the ongoing technical work, especially in relation to flood risk, the need to gain planning permission, assemble land and construct the relief road within a very tight timescale. Furthermore, should the relief road not be pursued through the HIF, this will impact upon the ability to deliver the relief road and its timing with resultant delay in realising highway capacity and environmental improvements in the town centre.

The recovery of forward funding by the Council via developer S106 agreement payments is dependent upon housing schemes coming forward within the timescale anticipated. The Council's adopted Local Plan and the Local Plan Review set out the policy framework for this. The Local Plan Review is currently at examination, the final outcome of which is awaited following examination hearings. The Council is utilising capacity funding to support activities such as masterplanning that will aid the delivery of the key housing sites in question. Officers will continue to work proactively to deliver these planned for sites, but this is ultimately not under the Council's control. Planning applications for some of these schemes have been received and are under consideration. Again, this does not prejudice or predetermine the assessment and decision making process on these applications.

**Equalities Assessment:** No equalities implications are anticipated as a result of this report.

## **1.0 Background: Housing Infrastructure Fund.**

1.1 In July 2017 the Government launched its £2.3 billion Housing Infrastructure Fund to finance infrastructure to unlock housing delivery. This funding to be awarded on a highly competitive basis. The Government has made this fund available to:

- Deliver new physical infrastructure to support new and existing communities;
- Make more land available for housing in high demand areas, resulting in new additional homes that otherwise would not have been built;
- Support ambitious local authorities who want to step up their plans for growth and make a meaningful difference to overall housing supply; and
- Enable local authorities to recycle the funding for other infrastructure schemes, achieving more and delivering new homes in the future.

1.2 This Council made two bids for HIF funding under the marginal viability part of the fund which was available to lower tier authorities. Proposals under this fund were capped at £10m each. The two schemes below both relate to highway Infrastructure schemes which will unlock development sites identified within both our adopted Local Plan and the Local Plan Review. The Council's HIF bids were considered and agreed at the meetings of Cabinet on 31<sup>st</sup> August 2017 and 23<sup>rd</sup> May 2018 with authority granted to make the bids and prioritise that relating to Cullompton.

1.3 It is now clear that the funding is offered on the basis of a locally recoverable grant. There is a requirement to recover the HIF funds from development. This Council will retain those funds locally (rather than return them to Homes England) and will need to recycle them into projects or schemes that achieve further accelerated housing delivery.

## **2.0 Background: Tiverton HIF project: Northern element of A361 junction east of Tiverton**

2.1 Construction of the first of two phases of the new junction off the A361 to serve the Tiverton Eastern Urban Extension has been completed on site. This first phase provides southern-side slip roads. The second phase of the junction is required to deliver Area B of the urban extension comprising up to 1,000 homes. (Further masterplanning of Area B is due to commence shortly pending award of the contract). The phase two junction works are for the bridge across the A361, the north side slips and associated landscaping. Planning permission has been granted for the full junction. HIF funding of £8.2m will deliver the northern phase of the junction.

2.2 Planning permission is also in place for up to 1,020 homes as part of the first phase of the urban extension (Area A), employment floorspace, a new community centre and primary school. The Tiverton Eastern Urban Extension is a strategic scale development allocation within the adopted Local Plan and Local Plan Review, the build out of which is significant to the delivery of these Plans. In the absence of the second phase of the junction, the homes in Area B will not come forward. The HIF bid has the support of Devon County Council, Tiverton Town Council, the Local Enterprise Partnership and Neil Parish MP.

## **3.0 Background: Cullompton HIF project: Cullompton Town Centre Relief Road**

3.1 At Cabinet on 23<sup>rd</sup> May 2018 it was agreed to proceed with the £10 million Cullompton HIF bid on the basis of delivering a town centre relief road to the east of Cullompton, which will improve capacity at the motorway junction together with achieving a reduction of traffic flows through the town centre resulting in air quality and town centre amenity benefits. The overall project cost is expected to be £15 million. The HIF bid for Cullompton infrastructure has the support of Cullompton Town Council, Cullompton Neighbourhood Plan Group, Devon County Council, the Local Enterprise Partnership and Neil Parish MP.

- 3.2 Devon County Council and Highways England have raised concerns regarding the capacity of Junction 28 for the M5 and its ability to accommodate additional traffic movements arising from planned developments. Whilst a longer term solution is planned comprising a strategic motorway junction improvement, the delivery of a town centre relief road for Cullompton will more quickly increase capacity at the motorway junction as a first phase of wider improvements. The relief road will facilitate more immediate development proposals to come forward comprising 2,000 homes planned for within the adopted Local Plan and Local Plan Review including of a first release of approximately 500 dwellings east of Cullompton which will form part of the Garden Village.
- 3.3 The delivery of the town centre relief road has also been a long held aspiration to reduce traffic flows through the town centre. Cullompton town centre is a designated Air Quality Management Area. The adoption and implementation of an Air Quality Action Plan (where an authority has designated one or more Air Quality Management Areas) is a statutory requirement under Part IV of the Environment Act 1995 for Local Air Quality Management (known as the LAQM regime). Under the regime, Local Authorities have a duty to pursue measures which are designed to improve air quality. The Council's Air Quality Action Plan includes the delivery of a Cullompton town centre relief road as an air quality mitigation measure.
- 3.4 The relief road will reduce traffic through Cullompton town centre, resulting in environmental improvement. The town's Conservation Area is included in the Historic England 'Heritage At Risk' Register where its condition is assessed as being very bad and deteriorating. In 2015 and 2017 applications were made to the Heritage Lottery Fund for a townscape heritage scheme. Despite the quality of the bids being recognised, neither were successful due to the fund being significantly oversubscribed. Subsequent contact with Historic England indicates other funding opportunities for the town's heritage, but that these would be unlikely to be available until such time as the traffic had been addressed through the delivery of the relief road. As such it can be seen that the delivery of a relief road is a pre-requisite to securing future investment in the heritage of Cullompton.
- 3.5 Where more than one HIF project has been submitted by a single Council, there is a requirement for the Council to rank them according to priority. At the Cabinet meeting of 31<sup>st</sup> August 2017 a decision was made to give the Cullompton bid highest priority out of Mid Devon's two HIF schemes.
- 3.6 The project is continuing to progress, with public consultation to establish a preferred route for the relief road route taking place between 13<sup>th</sup> September and 25<sup>th</sup> October 2018. Outcomes from this consultation indicated that 77% of the 617 respondents agreed with the need for a relief road, 61% considered it should be located to the west of the motorway rather than to the east and a clear preference was shown for one of the routes (Option B) when asked which option was preferred. At the meeting of Cabinet on 31<sup>st</sup> January 2019 it was resolved that Option B be recommended to Devon County Council as the preferred route, (subject to further technical verification work, including whether some aspects of the third alternative route be incorporated), that Devon County Council undertakes the further work with the preparation of a

planning application considers holding a second stage of consultation prior to submitting a planning application. S106 funds were also agreed to finance the further work in these recommendations.

- 3.7 At a meeting of Devon County Council's Cabinet on 13<sup>th</sup> March 2019 it was resolved:
- a) that the preferred route for the relief road be approved;
  - (b) that the development and submission of a planning application for the relief road be agreed;
  - (c) that delegated authority be given to the Head of Planning, Transportation and Environment, in consultation with the Cabinet Member for Infrastructure, Development and Waste, to make minor amendments to this scheme;
  - (d) that an increase to the Planning, Transportation and Environment 2019/20 capital programme of £250,000, funded by external contributions be approved; and
  - (e) that a further consultation, as requested by Mid Devon District Council, be approved, which could include a review of connections to the existing road network.

Since March 2019, the County Council has been working on the technical evidence, design of the road and liaison with affected land owners/ land interests. It is understood that a planning application is expected to be submitted to this Council in the Autumn of 2019 before which the County Council will hold a further public consultation exercise.

#### **4.0 Grant funding agreements with Homes England**

- 4.1 Offer letters for grant funding for both schemes totalling £18.2 million have been received from Homes England. In order to draw down this money, a funding agreement for each project must be entered into between the Council and Homes England. Separate agreements will also be needed with Devon County Council to deliver the infrastructure in question.
- 4.2 The grant funding agreements are set out in a standard form, but allow for project specific circumstances and milestones to be included. Officers, including the Group Manager for Legal Services have reviewed and negotiated with Homes England over the wording of the draft agreements. As drafted the agreements are structured as follows:

##### **Section 1**

This includes details of the project and funding programme (HIF) and the parties entering into the agreement together with recitals within which Homes England agrees to make the grant funding available. The Local Authority may either directly procure for the delivery of the infrastructure project or provide funding to developer parties or third parties. In this instance the County Council is the proposed delivery partner.

Key principles for the funding of the project are set out including the total amount (£8.2m Tiverton and £10m Cullompton) including definitions of the HIF funded infrastructure and the wider project. The latter being the homes that will be unlocked as a result of the infrastructure. The funding is available

until 31<sup>st</sup> March 2021(Cullompton) and 31<sup>st</sup> March 2022 (Tiverton). Start and completion dates are to be included following discussion with Homes England.

Conditions precedent to each claim for funding relate to how and when the claims are presented and Homes England agrees to pay the funding in accordance with the terms of the agreement. Claims require sign off by the Council's S151 Officer. The Local Authority agrees to meet monitoring and progress report requirements and repay any overpayments. This section also addresses communication details between the Council and Homes England, procedures for amendments and termination of the agreements.

## **Schedule 2**

This section sets out standard terms and conditions of the funding and definitions used. Homes England agrees to make the funding available subject to pre-conditions being fulfilled. Pre-condition submissions have been made to Homes England for both schemes and relate to project information such as project programme, cashflow, land assembly approach (Cullompton), recovery mechanism for the HIF funding and obtaining independent state aid advice.

The Local Authority agrees to a series of warranties and representations and will be the accountable body for these projects. Of note is the requirement for the Local Authority to recover the HIF funding from developers or site owners. It is proposed that the Council use all reasonable or commercially prudent endeavours to do so. Recovered HIF money may be retained by the Local Authority and recycled so it is used for further housing delivery. The mechanism proposed by the Council for recovery of HIF funding is via S106 agreements in connection with the associated housing developments.

Given that the County Council will deliver and hence procure and run the contracts for the construction of the road and junction in question, the separate agreement to be drawn up between this Council and the County Council will seek to ensure compliance with the relevant funding agreement warranties.

The arrangements and requirements for the payment of the funding are set out in this schedule, for example the arrangements and format for the submission of claims. This Council will seek agreement with the County Council that it will prepare and evidence the claims for checking and submission by this Council. Claims will require Section 151 Officer sign off.

Unless agreement is gained to vary, the Local Authority is to ensure the project commences by the start date and is carried out in accordance with the milestone dates and cashflow to be agreed with Homes England. Clawback on default provisions are included to safeguard the position of Homes England, as is the ability to require repayment or recover funds if required under state aid provisions. This Council has already gained independent state aid legal advice for each project which has not raised any concerns.

This section also includes requirements over reporting of progress, inspection, audit, conduct, insurance, confidentiality, freedom of information, data protection, insurance, indemnity, VAT, project changes, access to information

and publicity. Many of the obligations within this schedule are expected as part of a standard funding agreement in order to set out the obligations on each party and safeguard the position of each.

### **Schedule 3**

This schedule sets out milestones (agreed key events and stages for the projects) in relation to both the HIF infrastructure and the associated wider housing developments. At the time of writing this report these milestones are still under discussion with Homes England but relate to establishing a series of agreed dates, such as project start and completion, planning permission, procurement and first claim for funding. The County Council has programmed the delivery of both projects and this information has informed those discussions. The measure for outputs will be the number of homes delivered.

### **Schedule 4**

This schedule will set out a series of pre-conditions to be satisfied before the drawdown of funds. Standard pre-conditions include non-breach of the agreement, state aid advice, land title provisions, the appointment of suitable contractors and approval of the project cashflow.

Project specific pre-conditions are also included relating to agreement of the recovery mechanism (S106 proposed), title/land assembly, planning permission and contractor procurement. These are the subject of discussion with Homes England.

### **Schedule 5**

Project specific clauses have been drafted by the Group Manager for Legal Services to safeguard the interests of the Council and to reflect the existence of a delivery partner (the County Council) in relation to responsibilities/obligations set out in other parts of the agreement.

- 4.3 It is clear that the majority of the contents and hence requirements of the funding agreements received from Homes England are standard. Project specific content has been carefully reviewed by officers in order to be factually correct and at the time of writing this report the contents of schedule 5, key milestones and pre-conditions remain the subject of discussion with Homes England. In order to proceed with this £18.2 million funding opportunity the agreements will need to be entered into. Homes England wish this to occur before the end of May 2019. It is understood that a resolution to do so before this date is sufficient, allowing for the agreements to be finalised and signed shortly thereafter. Agreement is sought to do so, as is delegated authority for the Section 151 Officer in consultation with the Group Manager for Legal Services to finalise and sign the agreements.

## **5.0 Project funding and cash flow**

- 5.1 For the Cullompton scheme, total project cost is expected to be £15 million, £10 million of which will be forward funded by Homes England via the HIF programme. The Council will seek to fund both the £5 million shortfall and locally recover HIF funding through S106 agreements as part of development planning applications. However, the timescale within which S106 payments would be expected lags behind the need to deliver the road scheme quickly to

meet Homes England requirements. Accordingly there is a need for the Council to forward fund (cash flow) the £5 million shortfall until S106 funds are received. This would be included in the Council's Capital Programme. It is expected that S106 funds will be received during the next 12 year period.

- 5.2 Evidence before the recent Local Plan Review examination hearings on the housing trajectory indicates an anticipated timescale for housing coming forward on the North West Cullompton (CU1) and East Cullompton (CU7) allocations. A planning application for development of the 100 house contingency site of Colebrook (CU21) has also been received (19/00118/MOUT). If granted, its potential housing trajectory is also included below and applications from these sites would be expected to make financial contributions towards the relief road. Note that only the first 500 homes at East Cullompton have been included as these will be unlocked by the relief road. The remainder of homes at East Cullompton will require a further, more substantial motorway junction upgrade.

Site	Policy	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	TOTAL
NW Cullompton	CU1	49	100	100	150	150	176	100	100	100	100	100	100	25	1350
East Cullompton	CU7			50	100	100	125	125							500
Colebrook	CU21	12	25	25	38										100

- 5.3 Similarly, build out of the Tiverton EUE housing would also be expected to take place up to 2033, also indicating an approximately 12 year period within which S106 monies would be expected to recover HIF funds, however in this case Council forward funding of this type is not anticipated.
- 5.4 There is a further area where more short term Council forward funding may be required and applies to both projects. The grant funding agreements with Homes England for each project specifies that the HIF funds will be drawn down in accordance with a programme of payments that has been agreed with Homes England. Whilst these payment claims are programmed by quarter and can be in advance of spend, it is still possible that the Council will be required to bear project costs in the short term until the quarterly HIF draw down payment is claimed and made.
- 5.5 At the time of writing this report the draft drawdown for each project as expected is set out. Note that amendment to the distribution of funds between instalments may be possible prior to agreement signature.

### Tiverton £8.2 million

Period	1 <sup>st</sup> instalment	2 <sup>nd</sup> instalment	3 <sup>rd</sup> instalment	4 <sup>th</sup> instalment
19/20	£5,000	£10,000	£20,000	£15,000
20/21	£140,000	£5,000	£5,000	£100,000
21/22	£20,000	£700,000	£2,500,000	£4,680,000

## Cullompton £10 million

Period	1 <sup>st</sup> instalment	2 <sup>nd</sup> instalment	3 <sup>rd</sup> instalment	4 <sup>th</sup> instalment
19/20	£170,000	£212,857	£219,286	£241,429
20/21	£2,192,857	£1,150,649	£1,537,240	£4,275,682

### 6.0 Conclusions

- 6.1 This represents a significant opportunity to gain £18.2 million to fund key highway infrastructure that will enhance the town centre environment of Cullompton and for both, deliver highway capacity improvements that will unlock housing development planned for in the Council's adopted Local Plan and the Local Plan Review for which examination hearings have been held. It is considered that both projects are important to the Local Plan Review and have policy support.
- 6.2 This Council has already resolved to pursue these HIF bids and the delivery of these infrastructure projects. Officers have been working hard to progress not only the projects themselves, but also through submissions and discussions with Homes England to secure the funding in question. In order to draw down funds the Council is required to enter into grant funding agreements which have been drafted for each scheme.
- 6.3 Authority to cashflow the funds necessary until claims for drawdown are made and funds received is sought in order to provide resilience over project cashflow and flexibility if required. Wherever possible claims will be made in advance for drawdown. Authority is also sought to cashflow project delivery where HIF funds are insufficient to cover the total cost of delivering the infrastructure in question. For Cullompton, £10 million of HIF funds will make a substantial contribution towards the expected £15 million project cost. Whilst project cost recovery from development via S106 will be sought, funds secured through this mechanism will lag behind project spend.

<p><b>Contact for any more information</b></p>	<p>Andrew Jarrett Deputy Chief Executive (Section 151) <a href="mailto:ajarrett@middevon.gov.uk">ajarrett@middevon.gov.uk</a> 01884 255255</p> <p>Jenny Clifford Head of Planning, Economy and Regeneration <a href="mailto:jclifford@middevon.gov.uk">jclifford@middevon.gov.uk</a> 01884 234346</p> <p>Kathryn Tebbey Group Manager for Legal Services <a href="mailto:ktebbey@middevon.gov.uk">ktebbey@middevon.gov.uk</a> 01884 234210</p>
<p><b>Background Papers</b></p>	<p>Cabinet November and December 2014; Council January 2015; Council 27<sup>th</sup> April 2016; Cabinet 15<sup>th</sup> September 2016;</p>

	<p>Council 22<sup>nd</sup> September 2016;  Cabinet 21<sup>st</sup> November 2016  Council 1<sup>st</sup> December 2016  Cabinet 31<sup>st</sup> August 2017  Cabinet 23<sup>rd</sup> May 2018  Cabinet 30<sup>th</sup> August 2018  Cabinet 31<sup>st</sup> January 2019</p> <p>MHCLG  <a href="https://www.gov.uk/government/publications/housing-infrastructure-fund">https://www.gov.uk/government/publications/housing-infrastructure-fund</a></p>
<b>File Reference</b>	
<b>Circulation of the Report</b>	

**CABINET**  
**30 MAY 2019**

## **TIVERTON EASTERN URBAN EXTENSION AREA B MASTERPLAN CONTRACT AWARD.**

**Cabinet Member:** \*\*\*\*\*  
**Responsible Officer:** Mrs Jenny Clifford, Head of Planning, Economy and Regeneration.

**Reason for Report:** To advise Members on the results for the procurement of a masterplan for the development of Area B, Tiverton Eastern Urban Extension.

**RECOMMENDATION:** That the contract is awarded to Supplier 3 with an agreed cost of £121,580.

**Relationship to Corporate Plan:** The Tiverton Eastern Urban Extension project contributes to the corporate priorities of facilitating housing and economic growth. The promotion of housing led growth on the eastern side of Tiverton forms part of Aim 2 of the priority referring to homes.

**Financial Implications:** The award of this contract is being funded from capacity money awarded to the project by the Government. Sufficient funding is available to cover the expected cost of delivering the masterplan for this part of the development. A budget for the work of up to £143,000 was set and included such studies and reports as needed to update the evidence base as well as the masterplan itself.

**Legal Implications:** The Council has an access agreement with Homes England to make use of the framework agreement for the purposes of this tender process. The Council must comply with the requirements of the framework agreement and let the contract in accordance with the procedures provided in it.

The suppliers referred to below are not identified – such information is confidential and not necessary to reach a decision. Any discussion which may identify a supplier should be treated as exempt information and must therefore be pre-empted by passing a resolution in accordance with Section 100A(4) of and Schedule 12A to the Local Government Act 1972, namely that such discussion would result in the disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A of the said Act, being information relating to the financial or business affairs of any particular person (including the authority holding that information).

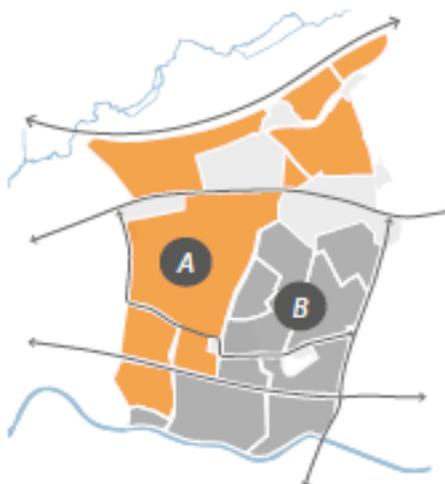
**Risk Assessment:** The tender process has been assessed against a series of quality criteria as well as price in order to ensure that the successful supplier not only represents value for money, but is also sufficiently experienced and suited to undertake the role. The evaluation outcome at para 2.4 of this report is weighted to the quality and price criteria.

### **1.0 INTRODUCTION.**

1.1 The adopted Local Plan allocates land at Tiverton Eastern Urban Extension for mixed use development. An area of 153 ha to the east of Tiverton is

allocated for mixed use development in the Allocations and Infrastructure Development Plan Document for 1550-2000 dwellings and 95,000-130,000 square metres of employment floorspace. A range of adopted policies within this document set out requirements for the planning of the urban extension in terms of development requirements, transport provision, environmental protection, green infrastructure, community facilities, carbon reduction and air quality, phasing and masterplanning. The latter, (policy AL/TIV/7) requires that the Council carry out a major public consultation exercise into the masterplanning of the site before planning applications are made.

- 1.2 The Tiverton EUE Masterplan was adopted as a Supplementary Planning Document (SPD) in April 2014. Whilst covering the whole of the development allocation site, it was not able to address all of the site to the same degree of detail. This was due to the absence of some site-wide survey work in Area B. As a consequence the Adopted Masterplan SPD does not fully resolve the land use issues across the whole allocation. It makes reference to the fully surveyed land area as Area A and the area of unresolved land use planning, to the south east of the allocation, as Area B.



- 1.3 The Tiverton EUE masterplan was commissioned by the landowners of Area A, but was produced collaboratively with Mid Devon District Council. A further masterplan for Area B is required, the commissioning of which will be by the District Council. Once adopted it will, complete the masterplanning process. It will form an addendum to the existing Masterplan SPD, sitting next to it, delivering the strategic objectives.
- 1.4 Cabinet at its meeting on the 2 February 2017 gave consideration to the requirements of the Area B masterplan. It is not intended to fully replace the existing masterplan. The relationship between them is likely to be as follows

Content	Adopted masterplan SPD		Proposed Area B masterplan
	Area A	Area B	
Introduction	YES	YES	UPDATE
Purpose and role of the document	YES	YES	
Meeting planning policy objectives	YES	YES	UPDATE
Consultation	YES	YES	UPDATE
Design process	YES	YES	NO
The site and location	YES	YES	NO
Landownership	YES	YES	NO
Site context	YES	YES	NO
Constraints and opportunities	YES	YES	UPDATE
Development concept	YES	YES	UPDATE
Guiding principles	YES	YES	NO
Masterplan	YES	Less detail	YES
Amount and land use	YES	Less detail	YES
Character areas	YES	YES	NO
Housing delivery rate	YES	YES	UPDATE
Phasing	YES	YES	UPDATE
Delivery, monitoring & review	YES	YES	UPDATE
Requirements for future apps	YES	YES	UPDATE

1.5 The Council has been successful in attracting capacity funding from the Government to deliver development at Tiverton Eastern Urban Extension. The funding bid submission indicated an intention for the Council to procure the additional work needed to complete the masterplanning of Area B. This tender process seeks to secure consultancy support to do this important next step in bringing this part of the development forward. Due to capacity constraints and the need to ensure the right experience, knowledge and skill set for this significant project, it is proposed to secure the masterplan management externally via consultancy support. The tender relates to the delivery of the masterplan as a single piece of work.

1.6 Due to the value of the contract, four suppliers were asked to tender. This was via the Homes England multidisciplinary framework agreement. All suppliers on the framework need to meet requirements set by Homes England in terms of experience, skills and approach to the commission.

## 2.0 THE PROCUREMENT PROCESS.

2.1 Expressions of interest were invited from 4 suppliers via the Homes England multidisciplinary framework on 4 February 2019.

2.2 Evaluation criteria set out in the tender document were as follows:

<b>Quality</b>	<b>60%</b>
Experience	15%
Qualifications and skills	15%
Approach to the commission	30%

## Price

40%

Responses were required by midday on 1<sup>st</sup> March 2019.

There were a total of 3 tender submissions received within the required timescale.

2.3 Evaluations were carried out between 1<sup>st</sup> and 7<sup>th</sup> March 2019 by representatives from the Planning, Economy and Regeneration service. The process included inviting those who submitted tenders to present their submission.

2.4 The outcome of the evaluation is shown below:

SUPPLIER	PRICE <sup>1</sup>	SCORE (WEIGHTED)		TOTAL
		PRICE	QUALITY	
Supplier 1	£107,459.73	3.2	3.35	6.55
Supplier 2	£139,497.28	2.4	3.76	6.16
Supplier 3	£121,580	2.8	3.80	6.60

### 3.0 CONCLUSION.

3.1 The outcome of the tender process shows **Supplier 3** as the winning bidder.

3.2 Approval is required from Cabinet for this contract to be formally awarded.

3.3 Following the decision, it is proposed to apply a voluntary standstill period of 10 days after which the contract will be awarded – it is voluntary because there is no statutory requirement for a standstill period when letting contracts under Framework Agreements. The Framework Agreement itself does not require a standstill period, but the Council has represented to bidders that standstill would be applied.

3.4 It is envisaged that the contract will start mid June 2019.

<b>Contact for more Information:</b>	Jenny Clifford, Head of Planning, Economy and Regeneration. 01884 0234346 <a href="mailto:jclifford@middevon.gov.uk">jclifford@middevon.gov.uk</a>
<b>Background papers:</b>	Cabinet report 2 Feb 2017 The adopted policies relating to the Tiverton Eastern Urban Extension <a href="http://www.middevon.gov.uk/aidpd">www.middevon.gov.uk/aidpd</a> . Cabinet 3 <sup>rd</sup> October 2013, 28 November 2013, 17 <sup>th</sup> April 2014
<b>File reference</b>	None
<b>Circulation of the Report:</b>	



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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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**MID DEVON DISTRICT COUNCIL – NOTIFICATION OF KEY DECISIONS**

**June 2019**

**The Forward Plan containing Key Decisions is published 28 days prior to each Cabinet meeting**

<b>Title of report and summary of decision</b>	<b>Decision Taker</b>	<b>Date of Decision</b>	<b>Officer contact</b>	<b>Cabinet Member</b>	<b>Intention to consider report in private session and the reason(s)</b>
<b>Cullompton Town Centre Masterplan</b> To consider the contract award	Scrutiny Committee  Cabinet	10 Jun 2019  27 Jun 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel: 01884 234346	Cabinet Member for Planning and Economic Regeneration	Open
<b>Environment Educational Enforcement Policy</b> To receive a report from the Group Manager of Street Scene and Open Spaces on the updates to the Environment Education and Enforcement Policy	Environment Policy Development Group  Cabinet	11 Jun 2019  27 Jun 2019	Stuart Noyce, Group Manager for Street Scene and Open Spaces Tel: 01884 244635	Cabinet Member for the Environment	Open
<b>National Assistance Burial Procedure</b> 3 yearly review	Environment Policy Development Group  Cabinet	11 Jun 2019  27 Jun 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Leader of the Council	Open

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Agenda Item 10.

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
<b>Market Schedule of Tolls</b> To receive a report recommending a schedule of market tolls for 2019/20.	Cabinet Member for Planning and Economic Regeneration	June 2019	Adrian Welsh, Group Manager for Growth, Economy and Delivery Tel: 01884 234398	Cabinet Member for Planning and Economic Regeneration	Open
<b>Regulation of Investigatory Powers</b> To receive the annual review of Regulation of Investigatory Powers from the Director of Corporate Affairs and Business Transformation.	Community Policy Development Group  Cabinet	25 Jun 2019  25 Jul 2019	Jill May, Director of Corporate Affairs and Business Transformation Tel: 01884 234381	Cabinet for the Working Environment and Support Services	Open
<b>Design Supplementary Planning Document</b> To consider a report seeking approval to consult on the draft Supplementary Planning Document.	Cabinet	27 Jun 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel: 01884 234346	Cabinet Member for Planning and Economic Regeneration	Open
<b>Crediton GP/NHS Hub - Loan Decision</b> To consider a report regarding the NHS Hub loan.	Cabinet	27 Jun 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet Member for Finance	Part exempt
<b>S106 Governance</b> To agree governance arrangements for S106 agreements	Cabinet	27 Jun 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel:	Cabinet Member for Planning and Economic Regeneration	Open

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
			01884 234346		
<b>Beech Road, Tiverton - Design and Build Tender</b> To consider the award of the tender	Cabinet	27 Jun 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet Member for Housing	Part exempt
<b>3 Rivers Developments Limited - Annual Accounts and Programme Update</b> To consider the annual accounts and programme update	Cabinet	27 Jun 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet Member for Housing	Part exempt
<b>Data Protection Policy</b> To consider the policy as part of an annual review	Cabinet	27 Jun 2019	Catherine Yandle, Group Manager for Performance, Governance and Data Security Tel: 01884 234975	Leader of the Council	Open
<b>Disposal of land at Park Nursery, Park Road- Tiverton</b> To consider the disposal of an asset.	Cabinet	27 Jun 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet Member for Housing	Open
<b>Revenue and Capital Outturn</b> To consider a report	Cabinet	27 Jun 2019	Andrew Jarrett, Deputy Chief Executive (S151)	Cabinet Member for Finance	Open

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
presenting the revenue and capital outturn figures for the financial year 2018/19			Tel: 01884 234242		
<b>Annual Treasury Management Report</b> To consider a report providing members with a review of activities and the actual prudential treasury indicators	Cabinet Council	27 Jun 2019 24 Jul 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet Member for Finance	Open
<b>Freedom of Information Policy</b> To consider the policy as part of an annual review	Cabinet	27 Jun 2019	Catherine Yandle, Group Manager for Performance, Governance and Data Security Tel: 01884 234975	Leader of the Council	Open
<b>Greater Exeter Strategic Plan for Consultation</b> To consider a report of the Head of Planning, Economy and Regeneration regarding a draft strategic plan.	Scrutiny Committee Cabinet	8 Jul 2019 25 Jul 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel: 01884 234346	Cabinet Member for Planning and Economic Regeneration	Open
<b>Multi Storey Car Park, Tiverton - Tender Outcome</b> To consider the outcome of	Cabinet	25 Jul 2019	Andrew Jarrett, Deputy Chief Executive (S151)	Cabinet Member for Housing	Part exempt

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
the tender process.			Tel: 01884 234242		
<b>Statement of Community Involvement Review 2018</b> Report to seek authority to consult on the draft revised text.....	Scrutiny Committee  Cabinet  Council	5 Aug 2019  22 Aug 2019  11 Sep 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel: 01884 234346	Cabinet Member for Planning and Economic Regeneration	Open
<b>Play Area Safety Inspection Policy</b> To receive a 3 year review from the Director of Operations of the Play Area Safety Inspection Policy	Environment Policy Development Group  Cabinet	6 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Leader of the Council	Open
<b>Cost Recovery &amp; Commercialisation in Growth, Economy &amp; Delivery</b> To receive a report presenting Members with steps to introduce cost recovery into the Growth, Economy and Delivery Service and to look at issues relating to further commercialisation within the service.	Economy Policy Development Group  Cabinet	8 Aug 2019  22 Aug 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel: 01884 234346	Cabinet Member for Planning and Economic Regeneration	Open

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
<b>Harassment Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Pets and Animals Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Boarding Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Income Management Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Allocations Policy and Procedures</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
<b>Homelessness Strategy</b>	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Corporate Asbestos Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	13 Aug 2019  22 Aug 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Single Equalities Policy and Equality Objective</b> To receive the annual review of the Single Equalities Policy and Equality Objective from the Director of Corporate Affairs and Business Transformation	Community Policy Development Group  Cabinet	20 Aug 2019  19 Sep 2019	Jill May, Director of Corporate Affairs and Business Transformation Tel: 01884 234381	Cabinet for the Working Environment and Support Services	Open
<b>Tiverton Regeneration Scheme - works to Fore Street and the market access - Award of Contract</b> To approve the outcome of the procurement exercise.	Cabinet	22 Aug 2019	Andrew Busby, Group Manager for Corporate Property and Commercial Assets Tel: 01884 234948	Cabinet Member for Housing	Part exempt

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
<b>Market Rights Policy</b> To receive a report presenting the Market Rights Policy	Economy Policy Development Group  Cabinet  Council	26 Sep 2019  17 Oct 2019  6 Nov 2019	Stephen Walford, Chief Executive Tel: 01884 234201	Cabinet Member for Planning and Economic Regeneration	Open
<b>Housing Revenue Account Asset Management Strategy</b> To consider a revised strategy.	Homes Policy Development Group  Cabinet	1 Oct 2019  17 Oct 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Compensation Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	1 Oct 2019  23 Oct 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Community Safety Partnership</b> To consider a report from the group Manager for Public Health and Regulatory Services outlining the Council's Community Safety Action Plan, and to seek Members recommendation to	Community Policy Development Group  Cabinet	8 Oct 2019  17 Oct 2019	Simon Newcombe, Group Manager for Public Health and Regulatory Services Tel: 01884 244615	Cabinet Member for Community Well Being	Open

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
acknowledge and accept the priorities action plan					
<b>Design Supplementary Planning Document - post consultation</b> To consider the Supplementary Planning Document post consultation	Cabinet	17 Oct 2019	Jenny Clifford, Head of Planning, Economy and Regeneration Tel: 01884 234346	Cabinet Member for Planning and Economic Regeneration	Open
<b>Cleaning Contractors</b> To approve the outcome of the procurement exercise.	Cabinet	17 Oct 2019	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet for the Working Environment and Support Services	Open
<b>Treasury Management Strategy and Mid Year Review</b> To consider a report with information regarding the treasury performance in the first 6 months of the municipal year.	Cabinet Council	21 Nov 2019 8 Jan 2020	Andrew Jarrett, Deputy Chief Executive (S151) Tel: 01884 234242	Cabinet Member for Finance	Open
<b>Domestic Abuse Policy</b> To consider a revised policy.	Homes Policy Development Group Cabinet	3 Dec 2019 19 Dec 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open

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Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
<b>Improvements to Council Property Policy</b> To consider a revised policy.	Homes Policy Development Group  Cabinet	3 Dec 2019  19 Dec 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>ASB Policy and Procedures</b>	Homes Policy Development Group  Cabinet	3 Dec 2019  19 Dec 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Household Management Policy</b>	Homes Policy Development Group  Cabinet	3 Dec 2019  19 Dec 2019	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open
<b>Corporate Health &amp; Safety Policy</b> To receive the annual review of the Corporate Health & Safety Policy from the Director of Corporate Affairs and Business Transformation.	Community Policy Development Group  Cabinet	10 Dec 2019  16 Jan 2020	Jill May, Director of Corporate Affairs and Business Transformation Tel: 01884 234381	Cabinet for the Working Environment and Support Services	Open
<b>Tenancy Policy</b> To consider a revised policy.	Homes Policy Development Group	17 Mar 2020	Andrew Pritchard, Director of Operations Tel:	Cabinet Member for Housing	Open

Title of report and summary of decision	Decision Taker	Date of Decision	Officer contact	Cabinet Member	Intention to consider report in private session and the reason(s)
	Cabinet	26 Mar 2020	01884 234950		
<b>Tenancy Strategy</b> To consider a revised strategy.	Homes Policy Development Group  Cabinet	17 Mar 2020  26 Mar 2020	Andrew Pritchard, Director of Operations Tel: 01884 234950	Cabinet Member for Housing	Open

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