

Cabinet

Tuesday, 15 October 2024 at 5.15 pm
Phoenix Chamber, Phoenix House, Tiverton

Next ordinary meeting
Tuesday, 12 November 2024 at 5.15 pm

Please Note: This meeting will take place at Phoenix House and members of the public and press are able to attend via Teams. If you are intending to attend in person please contact the committee clerk in advance, in order that numbers of people can be appropriately managed in physical meeting rooms.

The meeting will be hybrid and an audio recording made and published on the website after the meeting.

[To join the meeting online, click here](#)

Meeting ID: 324 801 527 283

Passcode: UMViuX

Membership

Cllr L Taylor	Leader of the Council
Cllr S J Clist	Cabinet Member for Housing, Assets and Property and Deputy Leader
Cllr J Lock	Cabinet Member for People, Development and Deputy Leader
Cllr N Bradshaw	Cabinet Member for Environment and Climate Change
Cllr J Buczkowski	Cabinet Member for Governance, Finance and Risk
Cllr G Duchesne	Cabinet Member for Parish and Community Engagement
Cllr S Keable	Cabinet Member for Planning and Economic Regeneration
Cllr J Wright	Cabinet Member for Service Delivery and Continuous Improvement
Cllr D Wulff	Cabinet Member for Quality of Living, Equalities and Public Health

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. **Apologies**
To receive any apologies for absence.
2. **Public Question Time**
To receive any questions relating to items on the Agenda from members of the public.
3. **Declarations of Interest under the Code of Conduct**
To record any interests on agenda matters.
4. **Minutes of the Previous Meeting** *(Pages 7 - 12)*
To consider whether to approve the minutes as a correct record of the meeting held on 17th September 2024.
5. **Medium Term Financial Plan - General Fund (GF)** *(Pages 13 - 30)*
To receive a report from the Deputy Chief Executive (S151 Officer) on the 2025/2026-2028/2029 Medium Term Financial Plan (MTFP) General Funds.
6. **Blackdown Hills National Landscape Management Plan** *(Pages 31 - 120)*
To receive a report from the Director of Place and Economy on the Blackdown Hills National Landscape Management Plan.
7. **Mid Devon Housing- Review of the Asbestos Management Plan** *(Pages 121 - 162)*
To receive a report from the Head of Housing & Health on the review of the Mid Devon Housing Asbestos Management Plan.
8. **Mid Devon Housing- Review of the Hoarding Policy** *(Pages 163 - 186)*
To receive a report from the Head of Housing & Health on the review of the Mid Devon Housing Hoarding Policy.
9. **Mid Devon Housing- Repairs and Maintenance Policy** *(Pages 187 - 212)*
To receive a report from the Head of Housing & Health on Mid Devon Housing Repairs and Maintenance Policy.
10. **Access to Information - Exclusion of the Press & Public**
Discussion with regard to item the next item, will require Cabinet to pass the following resolution to exclude the press and public having reflected

on Article 12 12.02(d) (a presumption in favour of openness) of the Constitution. This decision will be required because consideration of this matter in public may disclose information falling within one of the descriptions of exempt information in Schedule 12A to the Local Government Act 1972. The Cabinet need to decide whether, in all the circumstances of the case, the public interest in maintaining the exemption, outweighs the public interest in disclosing the information.

Recommended 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).

11. **Leisure Pricing Strategy 2025** *(Pages 213 - 220)*
To receive a report from the Head of Revenues, Benefits & Leisure presenting proposals to change the Leisure fees and charges from January 2025.
12. **Streetscene Depot - Additional Lease** *(Pages 221 - 238)*
To receive a report from the Deputy Chief Executive (S151 Officer), Head of Finance, Property and Climate Change and Head of People, Performance and Waste on the Additional Lease.
13. **Notification of Key Decisions** *(Pages 239 - 254)*
To note the contents of the Forward Plan.

Guidance notes for meetings of Mid Devon District Council

From 7 May 2021, the law requires all councils to hold formal meetings in person. The Council will enable all people to continue to participate in meetings via Teams.

If the Council experience technology difficulties at a committee meeting the Chairman may make the decision to continue the meeting 'in-person' only to conclude the business on the agenda.

1. Inspection of Papers

Any person wishing to inspect minutes, reports, or the background papers for any item on the agenda should contact Democratic Services at Committee@middevon.gov.uk

They can also be accessed via the council's website [Click Here](#)

Printed agendas can also be viewed in reception at the Council offices at Phoenix House, Phoenix Lane, Tiverton, EX16 6PP.

2. Members' Code of Conduct requirements

When considering the declaration of interests and their actions as a councillor, Members are reminded of the requirements of the Members' Code of Conduct and the underpinning Principles of Public Life: Honesty; Integrity; Selflessness; Objectivity; Accountability; Openness; Leadership.

The Code of Conduct can be [viewed here](#):

3. Minutes of the Meeting

Details of the issues discussed, and recommendations made at the meeting will be set out in the minutes, which the Committee will be asked to approve as a correct record at its next meeting. Minutes of meetings are not verbatim.

4. Public Question Time

Residents, electors or business rate payers of the District wishing to raise a question and/or statement under public question time are asked to provide their written questions to the Democratic Services team by 5pm three clear working days before the meeting to ensure that a response can be provided at the meeting. You will be invited to ask your question and or statement at the meeting and will receive the answer prior to, or as part of, the debate on that item. Alternatively, if you are content to receive an answer after the item has been debated, you can register to speak by emailing your full name to Committee@middevon.gov.uk by no later than 4pm on the day before the meeting. You will be invited to speak at the meeting and will receive a written response within 10 clear working days following the meeting.

Notification in this way will ensure the meeting runs as smoothly as possible

5. Meeting Etiquette for participants

- Only speak when invited to do so by the Chair.
- If you're referring to a specific page, mention the page number.

For those joining the meeting virtually:

- Mute your microphone when you are not talking.
- Switch off your camera if you are not speaking.
- Speak clearly (if you are not using camera then please state your name)
- Switch off your camera and microphone after you have spoken.
- There is a facility in Microsoft Teams under the ellipsis button called "turn on live captions" which provides subtitles on the screen.

6. Exclusion of Press & Public

When considering an item on the agenda, the Committee may consider it appropriate to pass a resolution under Section 100A (4) Schedule 12A of the Local Government Act 1972 that the press and public be excluded from the meeting on the basis that if they were present during the business to be transacted there would be a likelihood of disclosure of exempt information, as defined under the terms of the Act. If there are members of the public and press listening to the open part of the meeting, then the Democratic Services Officer will, at the appropriate time, ask participants to leave the meeting when any exempt or confidential information is about to be discussed. They will be invited to return as soon as the meeting returns to open session.

7. Recording of meetings

All media, including radio and TV journalists, and members of the public may attend Council, Cabinet, PDG and Committee meetings (apart from items Media and Social Media Policy - 2023 page 22 where the public is excluded) you can view our Media and Social Media Policy [here](#). They may record, film or use social media before, during or after the meeting, so long as this does not distract from or interfere unduly with the smooth running of the meeting. Anyone proposing to film during the meeting is requested to make this known to the Chairman in advance. The Council also makes audio recordings of meetings which are published on our website [Browse Meetings, 2024 - MIDDEVON.GOV.UK](#).

8. Fire Drill Procedure

If you hear the fire alarm you should leave the building by the marked fire exits, follow the direction signs and assemble at the master point outside the entrance. Do not use the lifts or the main staircase. You must wait there until directed otherwise by a senior officer. If anybody present is likely to need assistance in exiting the building in the event of an emergency, please ensure you have let a member of Democratic Services know before the meeting begins and arrangements will be made should an emergency occur.

9. WIFI

An open, publicly available Wi-Fi network is normally available for meetings held in the Phoenix Chambers at Phoenix House.

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MINUTES of a **MEETING** of the **CABINET** held on 17 September 2024 at 5.15 pm

**Present
Councillors**

L Taylor, N Bradshaw, J Buczkowski,
S J Clist, S Keable, J Lock, J Wright and
D Wulff

**Apology
Councillor**

G Duchesne

**Also Present
Councillors**

C Harrower and L Knight

**Also Present
Officers:**

Stephen Walford (Chief Executive), Richard Marsh
(Director of Place & Economy), Paul Deal (Head of
Finance, Property & Climate Resilience), Tristan Peat
(Forward Planning Team Leader) and Laura Woon
(Democratic Services Manager)

**Councillors
Online**

E Buczkowski, G Czapiewski, A Glover, M Fletcher
R Roberts and S Robinson

58. **APOLOGIES**

Apologies were received from Cllr G DuChesne.

59. **PUBLIC QUESTION TIME**

Steve Rowe

Question 1:

Question 54 on the agenda item 6, could you please inform me what the Councillors are doing to assist SME builders?

Response:

The draft responses that that have been prepared and are before Members make two references to SME builders in relation to the delivery of new homes.

The response to question 54 refers to community land trusts as a way of helping local communities in getting housing to meet their specific local needs. These are

established interventions which the Council would wish to see continue through grant to replenish the community housing fund.

In question 58, a reference is included to SMEs in relation to a choice of sites coming through the planning process. The National Planning Policy Framework requires a minimum of 10% of housing requirement to be met on small sites. This would create an opportunity through the development process to have smaller sites coming through where SMEs had more opportunities to access land for development. On larger sites, SME's may typically be excluded as those are typically developed or land banked by volume house builders. The response suggests that this could be addressed, and opportunities for SME's facilitated, by requiring larger sites to include an element of deliver by SME's.

Question 2:

Is it your Cabinet that hold the executive team to account for their actions or is it the responsibility of another body or Committee? And to whom must I address.

Response from the Leader of the Council:

The usual procedure rules would be that the Council would ask for the questions in advance in order to prepare a response at the meeting and to ensure the correct information would be given. The executive would be the Cabinet and each Cabinet Member would have different responsibilities.

Supplementary Question:

If you have an executive team that then say they are going to do something and they do not do it, who holds them to account?

What Committee or is it Steering Committee? Or is it Cabinet?

Response from the Leader of the Council:

If you have a concern about a Cabinet Member portfolio you could directly go to the relevant Cabinet Member. If it was an operational issue you may also go through the complaints procedure of the Council.

60. DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT

Members were reminded of the need to make a declaration of interest where appropriate.

Cllr S Clist declared his involvement in the Planning Policy Advisory Group with regard to the National Planning Policy Framework.

61. MINUTES OF THE PREVIOUS MEETING

The minutes of the previous meeting held on 27 August 2024 were **APPROVED** as a correct record and **SIGNED** by the Leader.

(Proposed by Cllr S Clist and seconded by Cllr N Bradshaw)

62. MEDIUM TERM FINANCIAL PLAN (MTFP)

The Cabinet had before it a report * from the Deputy Chief Executive (S151) Officer presenting the Medium Term Financial Plan (MTFP).

The Cabinet Member for Governance, Finance and Risk outlined the contents of the report with particular reference to the following:

- The Medium Term Financial Plan (MTFP) for the General Fund covering the years 2025/26 to 2028/29.
- The MTFP would normally cover a 5 year horizon, the change in Government and the importance of the Autumn Budget for the future of public services, adding a new year 5 had been delayed until the Council was better informed.
- The report only covered the General Fund, whereas normally the report would also include the Housing Revenue Account and the Capital Programme. These would be developed and would come through the governance process in due course.
- The latest forecast position was based upon the most up to date information. It was important to agree the underlying principles set out in Section 2.6 of the report.
- The underlying assumptions were included within Appendix 1, along with some sensitivity analysis that gave some scale to the variability of the MTFP and would be refined as the Council progressed through the budget process.
- The headline position for the General Fund was that there was a projected shortfall in 2025/26 of £1.2 million, increasing to £4 million by 2028/29.
- Senior officers have identified a range of budget options to address the budget shortfall using the red, amber and green assessment, which would be presented to the relevant Policy Development Groups for discussion, with the recommendation to support the green and amber options.
- Newly identified budget pressures in Appendix 3 and savings options in Appendix 4A which were relevant to Cabinet only, or Appendix 4B for all saving options.

Discussion took place regarding:

- The figures and comparator data on staff turnover and sickness.
- The annual shortfall decreases in 2027 from £1.6 million to £655k was there a reason for the large decrease?
- The uncertainty of the future Local Government Funding.
- The positive approach to the Homes for Ukraine Scheme.
- The percentage increase in gas and electricity, would there be a decrease when the alternative green energy sources are used?
- The emerging budget pressure in relation to planning enforcement and criticism the Council had received and why it was considered a high risk.
- The engagement figures of the residents that had been involved with Let's Talk Devon or the reduction in the engagement.

RESOLVED that:

1. The updated MTFP's for the General Fund covering the years 2025/26 to 2028/29 be noted.
2. Cabinet agreed the principles and endorsed the approach to balancing the General Fund Revenue Budget outlined in paragraph 6.2.

3. Cabinet seek recommendations from the Policy Development Groups on the Round 1 Budget Proposals and their views on where savings could be sought and to what level.

(Proposed by Cllr J Buczkowski and seconded by Cllr S Clist)

Note: * Report previously circulated.

63. **NATIONAL PLANNING POLICY FRAMEWORK**

The Cabinet had before it and **NOTED** a report * from the Director of Place and Economy on the National Planning Policy Framework.

The Cabinet Member for Planning and Economic Regeneration outlined the contents of the report with particular reference to the following:

- The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how those would be applied.
- It provides a framework within which locally-prepared plans would provide sufficient housing and other development in a sustainable manner.
- The NPPF was first introduced in 2012, it had replaced previous National Planning Policy guidance and statements and had been subject to updates made in July 2018, February 2019, July 2021 and in December 2023.
- The current version of the NPPF included revisions made in response to the Levelling-up and Regeneration Bill: reforms to National Planning Policy consultation at that same time.
- In particular, the December 2023 NPPF update removed the requirement for Local Authorities with an adopted Local Plan less than 5 years old to continually demonstrate a 5 year housing land supply.
- The Government published its consultation "proposed reforms to the National Planning Policy Framework and other changes to the planning system", and had made clear that reform was necessary to reverse the December 2023 changes to the NPPF that it considered "were damaging to housing supply, disrupted plan-making and undermined investor confidence."
- The consultation document included 106 questions and comments were invited by Local Authorities and other interested parties by 24th September 2024. There was now an opportunity for the Council to consider the implications of the proposed reforms in relation to plan making and also the determination of planning applications in Mid Devon and submit its own response to consultation. The draft consultation responses, informed through discussions with PPAG, were presented for review and discussion.

Discussion took place regarding:

- The housing issues and the concerns for implications to our environment.
- The gain of land for housing would be a loss to other uses, biodiversity and agriculture.
- Net Zero Advisory Group (NZAG) recommended that the Council sought clarification from the Government on whether the Council's targets could be met through repurposing.
- A decision about housing targets and the ability to balance the new land release with biodiversity and carbon storage opportunities.

- To strategically work on nature recovery with local nature recovery partnerships. When allocating new developments to go beyond the minimum ten percent biodiversity net gain. Including on site and per development application to ensure a more strategic balance was found between development and biodiversity.
- To consider including the following: reference to the renewal of railway infrastructure and renewal of sustainable transport opportunities such as cycle ways on old railway lines. Public transport to reduce additional traffic impacts from meeting new housing targets. River based management plans. The erosion of the open countryside with scattered housing development.
- To seek further clarification on whether Neighbourhood Plans could incorporate renewable energy preferences and plans.
- The references to Areas of Outstanding Natural Beauty should be national landscapes.
- In the response could the diversity needs of the community be more widely reflected? (I.e. neuro-diversity/dementia friendly etc.)
- Scope for the response to include reference to how Local Authorities could take on more initiatives to deliver the additional housing needed – i.e. through expanded HRA developments where sufficient funding was made available and legislative regimes proactively supported and encouraged such development and retention of stock

(Proposed by Cllr S Keable and seconded by Cllr N Bradshaw)

Note: *Report previously circulated.

64. **NOTIFICATION OF KEY DECISIONS**

The Cabinet had before it, and **NOTED**, the Notification of Key Decisions *.

The Clerk identified the changes that had been made to the list since it was published with the agenda. This included the following:

- The S106 Governance Framework report had moved from 15th October to 12th November.
- The Tiverton Eastern Urban Extension, Area B Masterplan had been added to 15th October
- Draft Policies and site options for the new Local Plan had moved from 15th October to 4th March 2025.
- The Local Development had been added to April 2025.

Note: * Key Decision report previously circulated.

(The meeting ended at Time 18.32pm)

LEADER

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Report for: Cabinet

Date of Meeting:	15 October 2024
Subject:	Medium Term Financial Plan – General Fund (GF)
Cabinet Member:	James Buczkowski – Cabinet Member for Governance, Finance and Risk
Responsible Officer:	Andrew Jarrett – Deputy Chief Executive (S151)
Exempt:	N/a
Wards Affected:	All
Enclosures:	Appendix 1 – Emerging Budget Pressures Appendix 2 – Savings Options

Section 1 – Summary and Recommendation(s)

To present to Member's the updated Medium Term Financial Plan (MTFP) which covers the period 2025/26 to 2028/29 and potential pressures and savings options for consideration / approval.

Recommendation(s):

That Cabinet Members:

1. Consider and agree the Green and Amber pressures within Appendix 1
2. Consider and agree the Green and Amber savings options within Appendix 2 taking into account the recommendations from the Policy Development Groups.
3. Consider the pressures / savings options with a red risk/deliverability rating and agree if any should be included within the 2025/26 Budget.
4. Consider any additional suggestions to balance the remaining shortfall and request that the Policy Development Groups identify further savings option and recommend back to Cabinet for approval.

Section 2 – Report

1.0 Introduction and purpose of the Medium Term Financial Plan

- 1.1 The main purpose of the MTFP is to show how the Council will strategically manage its finances in order to support the delivery of the priorities detailed in the Corporate Plan 2024 – 2028 and future years beyond that plan.
- 1.2 On 17 September, the first draft MTFP covering the period 2025/26 to 2028/29 for the General Fund was presented to Cabinet. This estimated a funding shortfall of £1.2m in 2025/26 rising to £4.0m by 2028/29. This number is derived without any remedial action and is a cumulative figure – i.e. if the £1.2m is found to balance the 2025/26 position, the overall budget gap will reduce to £2.8m. This is largely driven by inflation and assumptions around further cuts in grant funding based upon a number of assumptions and the most up to date information available at this time. Clearly, any major variations in these assumptions would require a fundamental review of the Council's MTFP and would be reported back to Cabinet and the wider Membership as soon as practical, coupled with proposed courses of action that could be implemented.
- 1.3 The Council has a legal requirement to set a balance budget and needs to ensure its overall costs are affordable i.e. they can be funded through income and planned short-term use of reserves. Members therefore need to take the necessary decisions and actions to manage net spending within affordable limits.

2.0 2025/26 Budget Options

- 2.1 During the summer, Leadership Team and services have been reviewing a range of budget options that could be considered in order to help mitigate that remaining budget shortfall across this MTFP, with a particular focus on 2025/26. Indicative areas where possible budget pressures (**Appendix 1**) are being felt and budget savings (**Appendix 2**) could be found have formed the basis of the discussions with the Policy Development Groups (PDG's). In addition the PDG's were asked to identify further options to resolve the immediate budget gap for 2025/26 and future years.
- 2.2 In putting forward the options, officers have applied a risk level to them based upon Red, Amber, Green as follows:

Red – indicates the saving could be taken, but there are higher risks/ implications associated with it and therefore officers would not recommend it;
Amber – indicates the saving could be taken, but there are risks and implications associated that members need to be aware of / accept;
Green – indicates a saving that is recommended by officers.

2.3 The overall value of the savings proposed is as follows:

	Low Risk / High Deliverability	Medium Risk / Medium Deliverability	High Risk / Low Deliverability	TOTAL
Pressures	£120k	£605k	£200k	£925k
Savings	(£369k)	(£1,162k)	(£305k)	(£1,836k)
Net Saving	(£249k)	(£557k)	(£105k)	(£911k)

2.4 Based on only accepting the Green and Amber budget options, the overall 2025/26 position is forecast to move as set out below:

Initial forecast Shortfall		£1,196k
Emerging Budget Pressures	Appendix 1	+ £725k
Budget Options Identified:		
Cabinet	Appendix 2	(£757k)
Economy & Assets PDG		(£172k)
Community, People and Equalities PDG		0
Homes		(£129k)
Planning, Environment & Sustainability PDG		(£39k)
Service Delivery & Continuous Improvement PDG		(£434k)
Revised forecast Shortfall		

2.5 During the PDG discussions, only the following was recommended not to be considered by Cabinet at this time, as the committee requested greater clarity on the implications of the saving.

Appendix 2 – row 8 – Let’s Talk MidDevon – (£111k)

Therefore it is recommended that this is not included within any savings approval. This would increase the remaining shortfall to £411k.

2.6 In addition, Cabinet should consider both the pressures and savings assessed as red. Within the budget pressure there are two proposals directly associated with the Council’s priorities, namely Climate Change and Planning Enforcement. Within the savings, there are two lines associated with income which officers now feel should be accepted – lines 35 and 37. Two further lines have possibly lowered in terms of deliverability – lines 25 and 31. Both relate to securing contribution from the Town or Parish Councils. To date, no proposals have been received but discussions are ongoing.

Should these specific lines be included / removed from the recommendations, the shortfall position alters as follows:

Revised forecast Shortfall		£390k
Let's Talk MidDevon Saving – delayed	Appendix 2 row 8	+ £11k
Proposed increase to Climate Change Budget	Appendix 1 row 7	+ £100k
Proposed increase to Planning Enforcement Budget:	Appendix 1 row 11	+ £100k
Additional Pre-App Planning Income	Appendix 2 row 35	(£40k)
Additional income generated from Planning Engagement in EUE proposals.	Appendix 2 row 37	(£10k)
Assumed financial contribution from Town / Parish Council - Property	Appendix 2 row 25	+ £60k
Assumed financial contribution from Town / Parish Council – Economic Development	Appendix 2 row 31	+ £50k
Potential Revised forecast Shortfall		£661k

2.7 Clearly there remains a significant budget shortfall in 2025/26. Therefore, all possible options to increase income or reduce costs must be considered. Options will be brought forward for consideration over the next few months in the run in to setting the 2025/26 budget in February 2025. The above plans will require all service areas to play an active role in securing future savings and the Council will also continue to consult with all of its major stakeholders, especially the tax payers, to ensure all future budgetary decisions accord with their priorities.

2.8 Members will appreciate that all budget options will require political support and therefore if some suggestions are deemed to be unacceptable then other savings will need to be proposed. Members should indicate where these alternatives should be sought.

3.0 Capital Programme 2025/26 – 2029/30

3.1 In order for the new Capital Programme projection to be meaningful, it requires the latest forecast slippage position to be incorporated. This will be available following Quarter 2 budget monitoring. Therefore, the indicated 2025/26 – 2029/30 Capital Programme will be brought to the November Cabinet.

3.2 The Capital Strategy needs to be relevant in the current financial and economic climate and therefore needs a cautious and measured, yet flexible, approach that reflects the fact that:

- The impact on the Revenue Budget arising from the Capital Investment Programme must be affordable and sustainable, and be used to aid the bottom line;

- Capital resources available to the Council are limited, with little direct funding provided from Government and currently limited scope to raise income from Capital Receipts;
- Local Government's range of responsibility is constantly changing along with the role that it plays within the community, leading to an expectation that Society will assist in the delivery of services.

3.3 Therefore the bids brought forward will focus on projects that deliver:

- Asset Replacement and/or Enhancement;
- Income Generation;
- Economic Regeneration;
- Invest to save opportunities; or
- Improve Health and Wellbeing

3.4 All capital expenditure must be financed, whether from external sources (Government grants and other contributions), the Council's own resources (Revenue, Reserves and Capital Receipts) or Debt (Borrowing, Leasing and Private Finance Initiative).

4.0 Housing Revenue Account – MTFP 2025/26 – 2029/30

4.1 The HRA is a ring-fenced account within Mid Devon's financial accounting system. This means that a balanced budget must be set each year including all income and expenditure pertinent to the Council's landlord function and excluding all other income and expenditure (since this would be captured as part of the General Fund budget).

4.2 The Council continues to undertake valuable benchmarking work in conjunction with Housemark. These findings are then used to inform the budget setting process. In doing so, MDCC are able to better identify their position in relation to other authorities in the sector and identify areas for improved efficiency.

4.3 The overall HRA budget has been constructed on a detailed line-by-line examination of expenditure and income, having regard to last year's outturn, this year's forecast position and the on-going improvement of the housing service.

4.4 Some items of expenditure can be defined quite accurately whilst others require managers to exercise business judgement based upon their experience, particularly in the case of new commitments. Where such judgement has been applied, the proposals before Members are based upon realistic assumptions.

4.5 The main changes for the 2025/26 budget can be summarised as follows:

Expenditure:

- An assumed pay award for 2024/25 equivalent to 3%;
- Pension Contribution rate remaining at 19.0%;
- An assumed inflationary increase in contractor and materials spend against the current year budget;
- Additional provision for essential repairs and maintenance and other legislative requirements.

Income

- An inflationary increase of 3% (based on CPI +1%) is proposed on existing rents, this will be subject to direction from Government in the coming weeks;
- An assumed reduction in Garage rents and Garage plot ground rent income as the development programme develops the land. At present the budget assumes no change to the weekly charge;
- Decreased interest yields on balances held.

- 4.6 The overall rental income was materially affected by the Governments previous policy to reduce Rents by 1% each year for four consecutive years and in 2023/24 by the government cap of 7% when inflation was over 11%. The Ministry of Housing, Communities and Local Government (MHCLG) have confirmed councils and housing associations will be able to increase their social housing rents by September's Consumer Price Index figure plus 1% in 2025/26. However, the sector continues to call for a 10-year rent settlement to give greater financial certainty for tenants and landlords.
- 4.7 Currently there is no financial provision for recent announcements during the last few weeks and comments emanating from the labour party conference regarding the future of Right-to-Buy, changes to rent setting and new energy efficiency requirements. When more information is available we will remodel and hope to quantify in time for the November Policy Development Group meeting.
- 4.8 Current legislation on Right to Buy means that we're likely to sell several properties in future years. We estimate, based on historic data that 16 will be sold next year.
- 4.9 Similarly, we forecast that we will have a number of void properties during the year. We have a prudent forecast of 84 voids across the year this is based on an assessment of current void numbers in line with previous years.
- 4.10 It has been deemed as prudent to maintain the HRA reserve balance at £2,000k and it is expected to remain so throughout 2024/25. At the start of 2024/25, other HRA revenue reserves totalled £21,330k. This included £13,943k in the Housing Maintenance Fund (HMF); £746k in the Renewable Energy Fund

(REF) and £189k for future decarbonisation works. It is intended that any expenditure funded from the REF monies be used on renewable energy schemes.

- 4.11 The budget summary for the 2025/26 HRA is shown in **Appendix 3**. It will continue to provide for an enhanced housing service which will allow for more capital investment and additions to our existing stock.
- 4.12 The ambition to build a significant number of new properties continues across the 5-year Medium Term Financial Plan. The prospect of building new social housing raises the issue of significant future capital financing requirements. Budget at assumed interest rates of circa 5% is included within the future years of the MTFP to finance the build of a number of new highly efficient (zero carbon) modular buildings, subject to securing sufficient funding. Members are reminded that the constraint on increasing stock is still an issue of affordability, not the access to borrowing.

5.0 Conclusion

- 5.1 The significant General Fund budget shortfall remaining is a challenge and the identification of further budget reductions is critical to balancing the budget for 2025/26 and indeed future years.
- 5.2 The MTFP will continue to be updated to ensure it is a live document. It is subject to amendment and review by Leadership Team and Members and will provide a clear guide prior to commencing the annual budget setting process in future years.
- 5.3 In order to conclude the statutory budget setting process, updates to the draft budget position will go through the PDG's and cabinet meetings before being agreed at Full Council on the 19 February 2025. During this period Officers will continue to identify and examine further savings possibilities that can reduce the longer term budget gap.

Financial Implications

By undertaking regular reviews of the MTFP the Council can ensure that its Corporate Plan priorities are affordable. The implications of the budget gap are set out within the paper. Many areas require greater clarity, particularly around national funding and possible changes to Government Policy. Therefore a number of key assumptions underpin the reported position, which will be refined as greater clarity is received through the budget setting process.

Legal Implications

None directly arising from this report, although there is a legal obligation to balance the budget. There are legal implications arising from any future consequential decisions to change service provision, but these would be assessed at the time.

Risk Assessment

The MTFP makes a number of financial assumptions based on a sensible/prudent approach, taking account of the most up to date professional advice that is available. These continue to be kept under review and updated where necessary.

Impact on Climate Change

The allocation of resources will impact upon the Council's ability to implement/fund new activities linked to climate change, as the MTFP sets the broad budgetary framework for the Council over the coming years. However, some provision has already been included in the base budget and further evaluation/consideration will be made as the draft budget passes through the PDGs over the next few months. Significant investment is currently forecast within the Capital Programme, however this will be dependent upon full options appraisals and levels of Grant funding available.

Equalities Impact Assessment

No implications arising from this report.

Relationship to Corporate Plan

The Medium Term Financial Plan (MTFP) sets out the financial resources available to deliver the Council's ongoing Corporate Plan priorities.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett

Agreed by or on behalf of the Section 151

Date: 1 October 2024 via Leadership Team meeting

Statutory Officer: Maria De Leiburne

Agreed on behalf of the Monitoring Officer

Date: 1 October 2024 via Leadership Team meeting

Chief Officer: Stephen Walford

Agreed by or on behalf of the Chief Executive/Corporate Director

Date: 1 October 2024 via Leadership Team meeting

Performance and risk: Dr Stephen Carr

Agreed on behalf of the Corporate Performance & Improvement Manager

Date: 1 October 2024

Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Andrew Jarrett – Deputy Chief Executive (S151)

Email: ajarrett@middevon.gov.uk

Telephone: 01884 234242

Background papers:

- 2024/25 Budget
- 2024/25 Qtr. 1 Budget Monitor

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Emerging Budget Pressures

(xk) = Saving, +£k = Pressure

Ref	Cabinet / PDG	Service	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	Low Risk	Medium Risk	High Risk
						(£k)	(£k)	(£k)
1	Cabinet	ICT	Lisa Lewis	IT700	Increased resources to tackle Cyber Security	£50		
2	Cabinet	ICT	Lisa Lewis	IT700	Possible increase resources to fully implement CRM / Transformation and gain maximum benefit (one off)		£125	
3	Cabinet	ICT	Lisa Lewis	IT900	Increased costs of payment card security solution		£30	
4	Cabinet	All Services	All CMT	All	Develop a plan to increase the cohort of Apprentices, considering static placements, rotating around service areas, and a graduate trainee programme		£150	
5	Cabinet	Property	Paul Deal	PS codes	Increase provision to sinking funds		£100	
6	Cabinet	Finance Leasing costs	Paul Deal	All	Likely increase in financing lease charges due to increase in numbers of vehicles leased	£50		
7	Economy & Assets	Property	Paul Deal	PS950	Increase budget within Climate Change - planned for consultancy, funding bid completion, grant schemes or increased officer time			£100
8	Homes	Housing	Simon Newcombe	PH373	Additional 1.2 FTE to support homelessness		£50	
9	Homes	Housing	Simon Newcombe	PH320	Creation of a new Sinking Fund to maintain the 11 new temporary accommodation houses	£20		
10	Planning, Environment & Sustainability	Planning (Development)	Angharad Williams	PR200	Reduction in Planning Income		£150	
11	Planning, Environment & Sustainability	Planning Enforcement	Angharad Williams	PR110	Increase the resource for Planning Enforcement			£100
Emergin Budget Pressures - Sub Total						£120	£605	£200
								£925

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Round 1 - Initial Savings Options

(xk) = Saving, +£k = Pressure

Ref	Cabinet / PDG	Service	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2025/26		
						Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
1	Cabinet	Finance	Paul Deal	FP100	Saving delivered through revised staffing structure	(£20)		
2	Cabinet	Finance	Paul Deal	FP200	Reduction in internal audit	(£15)		
3	Cabinet	People Services	James Hamblin / Matthew Page	HR100	Capturing benefits from CRM system to achieve efficiency saving.		(£27)	
4	Cabinet	People Services	James Hamblin / Matthew Page	HR100	We obtain legal insights from seminars and other online means	(£3)		
5	Cabinet	People Services	James Hamblin / Matthew Page	HR100	Centralise Training budgets and capture underspend		(£5)	
6	Cabinet	Corporate Performance	Dr Stephen Carr	CM205	Remove the support and maintenance for the SPAR software	(£3)		
7	Cabinet	Revenues & Benefits	Dean Emery / Fiona Keyes	RB100	Review staffing structure as more more benefits claimants more to Universal Credit.			(£30)
8	Cabinet	Communications	Lisa Lewis	IT200	Let's Talk MidDevon - reduction in engagement activity opportunities digitally		(£11)	
9	Cabinet	ICT	Lisa Lewis	IT500	Remove MBPM - old CRM	(£7)		
10	Cabinet	Elections	Jackie Murphy	LD100 LD200 LD201	Maximise the recharges included within the recovery of external election costs from Government	(£5)		
11	Cabinet	Elections	Jackie Murphy	LD100 LD200 LD201	Increase the use of temporary staff and reduce the permanent staffing	(£5)		
12	Cabinet	Elections	Jackie Murphy	LD100 LD200 LD201	Reduce postage costs through increased electronic communications		(£1)	
13	Cabinet	Finance	Paul Deal	IE290	Possible increase in investment returns while rates are higher (based on ave 3.5% return on £20m ave investment, less 40% to HRA) - one off		(£100)	
14	Cabinet	All Services	Darren Beer / Matthew Page	Account code 3404	10% saving estimation on both fuel spend/savings	(£50)		
15	Cabinet	All Services	Paul Deal	Account codes 2301 / 2304	Saving estimation on Utilities spend, following reduction in prices and price cap		(£150)	
16	Cabinet	All Services	Workforce Review Group and CMT	All	Vacancy Saving from Workforce Review Group delivered through delayed recruitment and robust challenge	(£50)		
17	Cabinet	All Services	Workforce Review Group and CMT	All	Reduced Sickness levels across the council increase productivity and reduced agency requirement		(£20)	
18	Cabinet	Capital Financing	Paul Deal	All	Likely reduction in capital financing charge due to level of slippage in 2023/24 Capital Programme	(£50)		
19	Cabinet	All Services	Paul Deal	All	Potential to free up Earmarked Reserves through reprioritisation of funds		(£100)	
20	Cabinet	All Services	Paul Deal	All	Potential further increase in Council Tax income above current assumptions (e.g. a combination of further increase Band D charge, additional growth in Taxbase and improvement in collection rate)		(£50)	

Ref	Cabinet / PDG	Service	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2025/26		
						Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
21	Cabinet	All Services	Paul Deal	All	Potential further increase in Business Rates income above current assumptions (e.g. a combination of additional growth in Taxbase and improvement in collection rate)		(£50)	
22	Cabinet	All Services	Paul Deal	All	Potential increase in Grant Funding income above current cash frozen assumptions (2% increase = £35k)		(£35)	
23	Economy & Assets	Property	Paul Deal	PS810	Lease more space commercially within Phoenix House (including recharges). Clarity required on requirements for PH, flexibility in changing accommodation, hybrid working etc			(£50)
24	Economy & Assets	Property	Paul Deal	PS980	Capturing benefits from CRM system to achieve efficiency saving. (previously offered in 2024/25 but this will be delivered through vacancy management).			(£30)
25	Economy & Assets	Property	Paul Deal	PS200	An assumption that either a financial contribution or transfer of assets is secured with some or all of the major Town and Parish Councils.		(£60)	
26	Economy & Assets	Property	Paul Deal	PS992	Refresh out of date leases - dependent upon market conditions at the time			(£10)
27	Economy & Assets	Property	Paul Deal	PS810	Use PH or leisure centres for pick-up points for Amazon, etc.			(£5)
28	Economy & Assets	Car Parking	Darren Beer / Matthew Page	CP520 / CP540	Pay & Display - recommended fee increase plus inclusion of growth	(£30)		
29	Economy & Assets	Car Parking	Darren Beer / Matthew Page	CP520 / CP540	Permits - recommended fee increase plus inclusion of growth	(£10)		
30	Economy & Assets	Car Parking	Darren Beer / Matthew Page	CP530	Introduce notional charge to most utilised Amenity Car Parks	(£10)		
31	Economy & Assets	Economic Development	Zoe Lentell / Adrian Welsh	PR400	Restructure staffing resources OR seek cost contribution from Towns / Parishes		(£62)	(£50)
32	Homes	Housing	Simon Newcombe	PH320	Reduced B&B costs following the purchase of 11 houses for temporary accommodation Potential further reduction in B&B costs through investment in additional temporary accommodation. (match funding to LAHF3).		(£75)	
33	Homes	Housing	Simon Newcombe	PH320	Proposal to include assumed grant allocation for Domestic Abuse - as received in recent years		(£34)	
34	Homes	Housing	Simon Newcombe	PH320	Increased income from recent houses purchased for temporary accommodation	(£20)		
35	Planning, Environment & Sustainability	Planning (Development)	Angharad Williams	PR200	Additional Pre-App Planning Income			(£40)
36	Planning, Environment & Sustainability	Planning (Development)	Angharad Williams	PR200	Cease advertising within local newspapers, online only	(£10)		
37	Planning, Environment & Sustainability	Planning (Development)	Angharad Williams	PR200	Additional income generated from Planning Engagement in EUE proposals.			(£10)
38	Planning, Environment & Sustainability	Planning (Forward Planning)	Tristan Peat	PR600	Review service costs/delivery		(£29)	
39	Service Delivery & Continuous Improvement	Customer Services	Lisa Lewis	CS932	Close reception to walk-ins - would still need a solution to building access			(£25)
40	Service Delivery & Continuous Improvement	Customer Services	Lisa Lewis	CS932	Restructure staffing resources			(£25)

Ref	Cabinet / PDG	Service	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2025/26		
						Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
41	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS700	Projection on Garden Waste Income from residents - recommended fee increase plus inclusion of growth in subscriptions	(£50)		
42	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS710	Projection re Trade Waste - recommended fee increase plus inclusion of growth in subscriptions	(£38)		
43	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS725	Projection of recycle income - volatile area in terms of selling prices		(£100)	
44	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS700	Recover set up costs from new housing developments			(£20)
45	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS710	Price increase in waste disposal charges	£100		
46	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS725	Price increase in recycling credits	(£100)		
47	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS725	Review Management Structure		(£25)	
48	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS700	Shared Savings - Assumes current agreement ceases on 2025/26 to be replaced by EPR - see below.		(£120)	
49	Service Delivery & Continuous Improvement	Waste Services	Darren Beer / Matthew Page	WS770	Increased rental charges from increased footprint at Carlu Close to future proof service for next 15-20 years. Potential release on one area once new operational layout implemented.	£53		
50	Service Delivery & Continuous Improvement	Leisure Services	Dean Emery	RS140 / RS150 / RS160	Review staffing Structure		(£83)	
51	Service Delivery & Continuous Improvement	Leisure Services	Dean Emery	RS140 / RS150 / RS160	Reduce overtime by minimum target		(£25)	
52	Service Delivery & Continuous Improvement	Leisure Services	Dean Emery	RS140 / RS150 / RS160	Recognise growth in income - over and above assumed inflationary increase	(£34)		
53	Service Delivery & Continuous Improvement	Leisure Services	Dean Emery	RS140 / RS150	Change from Chlorine to Salt solution	(£12)		
54	Service Delivery & Continuous Improvement	Leisure Services	Dean Emery	RS140 / RS150 / RS160	Potential income from advertising on Apps			(£10)

Initial Savings Options - Sub Total

(£369)	(£1,162)	(£305)
(£1,836)		

Ideas that need more consideration to identify possible financial benefit

Ref	Cabinet / PDG	Service	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2025/26		
						Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
55	Cabinet	Property	Paul Deal	PS160	Potential reduction in project maintenance spend - high risk as dependent upon condition survey results and requirements			??
56	Cabinet	Customer Services	Lisa Lewis	CS932	Reduce Contact Centre hours to match open hours e.g. 09:00 - 14:00			??

Ref	Cabinet / PDG	Service	Budget Holder	Cost Centre	BRIEF Saving Description (including risks of delivery)	2025/26		
						Low Risk (£k)	Medium Risk (£k)	High Risk (£k)
57	Cabinet	Revenues & Benefits	Dean Emery	IT500	Investment in GovTech/CRM and migration from NEC portal for self-serve and automation into back office		??	
58	Cabinet	Waste Services	Darren Beer / Matthew Page	WS700	EPR is due to go live for 2025-26. Value assumed equal and opposite to loss of Waste Shared Saving	??		
59	Cabinet	Economic Development	Adrian Welsh	PR992	Maximise the use of S106 within economic development projects		??	
60	Cabinet	All Services	Paul Deal	All	Potentially sell services, or provide training to other organisations			??
61	Cabinet	Democratic Services	Laura Woon	LD300	Cease printing committee papers and fully utilise Mod.Gov		??	
62	Cabinet	All Services	Paul Deal	All	Improved procurement could save money across all service areas		??	
63	Cabinet	All Services	Paul Deal	All	Possible reduction in pension contributions in 2026/27 based on current fund valuation		??	
64	Cabinet	All Services	Paul Deal	All	Policy on printing [default email for services - statutory excluded if necessary) - costings/savings TBC		??	
Ideas that need further work - Sub Total						£0	£0	£0

MID DEVON DISTRICT COUNCIL
HRA MEDIUM TERM FINANCIAL PLAN 2025-26 TO 2029-30

	2024-25	Infl	2025-26	Infl	2026-27	Infl	2027-28	Infl	2028-29	Infl	2029-30
	£	%	£	%	£	%	£	%	£	%	£
Employee costs											
Base salary budget	4,217,650		4,344,180		4,474,505		4,608,740		4,747,002		4,889,412
Other Employee costs	-		-		-		-		-		-
<i>Inflation base</i>	4,217,650	3.0%	4,344,180	3.0%	4,474,505	3.0%	4,608,740	3.0%	4,747,002	3.0%	4,889,412
Total in year cost	4,217,650		4,344,180		4,474,505		4,608,740		4,747,002		4,889,412
Premises costs											
Base budget	292,550		497,590		522,820		548,800		575,560		603,130
Utilities	115,550		10,000		10,000		10,000		10,000		10,000
Other cost pressures	75,000		-		-		-		-		-
Savings	-		-		-		-		-		-
<i>Inflation base</i>	483,100	3.0%	507,590	3.0%	532,820	3.0%	558,800	3.0%	585,560	3.0%	613,130
Total in year cost	483,100		507,590		532,820		558,800		585,560		613,130
Transport related costs											
Base budget	282,930		297,080		311,930		327,530		343,910		361,110
Cost Pressures	-		-		-		-		-		-
<i>Inflation base</i>	282,930	5.0%	297,080	5.0%	311,930	5.0%	327,530	5.0%	343,910	5.0%	361,110
Total in year cost	282,930		297,080		311,930		327,530		343,910		361,110
Supplies and services											
Base budget	2,960,840		2,951,380		3,413,950		3,584,650		3,763,880		3,952,070
Cost Pressures	(150,000)		300,000		-		-		-		-
<i>Inflation base</i>	2,810,840	5.0%	3,251,380	5.0%	3,413,950	5.0%	3,584,650	5.0%	3,763,880	5.0%	3,952,070
One off costs	-		-		-		-		-		-
Total in year cost	2,810,840		3,251,380		3,413,950		3,584,650		3,763,880		3,952,070
Support services	1,956,920	3.0%	2,015,628	3.0%	2,076,096	3.0%	2,138,379	3.0%	2,202,531	3.0%	2,268,607
Total gross expenditure	9,751,440		10,415,857		10,809,301		11,218,099		11,642,883		12,084,329
Rents , fees, charges and Other Income											
Housing Rents	(14,710,680)		(15,152,000)		(15,986,010)		(16,740,290)		(17,398,750)		(17,965,930)
Income increases - Growth in units	-		(433,100)		(312,400)		(198,900)		(92,400)		(50,000)
Income Reductions-Units lost through Right-to-Buy	-		85,600		88,100		90,800		93,500		96,300
Garage and Garage Ground Rent income	(407,960)		(368,686)		(333,339)		(301,527)		(272,897)		(247,129)
Other Income	(871,460)		(906,460)		(897,579)		(820,984)		(755,192)		(698,615)
<i>Inflation base</i>	(15,990,100)	3.0%	(16,774,646)	3.0%	(17,441,229)	3.0%	(17,970,902)	3.0%	(18,425,738)	3.0%	(18,865,374)
One off initiatives	-		-		-		-		-		-
Total in year cost	(15,990,100)		(16,774,646)		(17,441,229)		(17,970,902)		(18,425,738)		(18,865,374)
NET COST OF SERVICES	(6,238,660)		(6,358,789)		(6,631,927)		(6,752,803)		(6,782,855)		(6,781,045)
Capital Financing	1,262,700		1,075,482		1,247,002		1,362,178		1,361,623		1,361,600
Interest Payable (PWLB)	1,164,690		1,190,080		1,417,260		1,771,445		1,910,116		1,840,571
Interest Payable HRA to GF	37,300		34,869		32,377		29,816		27,185		24,481
Interest Payable (finance leases)	20,320		20,500		20,500		21,900		61,000		64,400
Contribution to Capital - MRA	2,635,000		2,892,700		2,892,700		2,892,700		2,892,700		2,892,700
Renewable energy surplus	152,340		144,400		137,180		130,320		123,800		117,610
Affordable Rent surplus	-		158,215		162,962		162,962		149,333		149,333
Principal adjustment	916,310		960,635		1,016,223		1,073,458		1,132,386		1,193,061
Transfers to sinking funds	50,000		50,000		50,000		50,000		50,000		50,000
Indirect costs/reserve transfers	6,238,660		6,526,881		6,976,204		7,494,779		7,708,143		7,693,756
Annual (Surplus) / Savings to be found	0		168,092		344,277		741,977		925,288		912,711
Cumulative (Surplus) / Savings to be found	0		168,092		512,369		1,254,346		2,179,634		3,092,345

Assumptions:

- 1 Salary inflation in line with General Fund assumptions
- 2 Utilities costs assumed a general uplift
- 3 Transport costs assumed inflationary increase only
- 4 Supplies & Services budget increase in 2025/26 provides additional provision for essential repairs and maintenance and other legislative requirements.
- 5 General Fund recharges assumed in line with GF forecast
- 6 Rents assumed an assumed inflation uplift of CPI +1%
- 7 Capital Financing will need to be revised based upon the updated Capital Programme and funding assumptions.
- 8 Other 'Below the Line' items will be updated in subsequent iterations of the MTFP

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Report for: Cabinet

Date of Meeting:	15 th October 2024
Subject:	Blackdown Hills National Landscape Management Plan
Cabinet Member:	Councillor Steven Keable, Cabinet Member for Planning and Economic Regeneration
Responsible Officer:	Richard Marsh, Director of Place and Economy
Exempt:	None
Wards Affected:	Upper Culm, Cullompton Outer (part)
Enclosures:	Appendix 1 – Blackdown Hills National Landscape Management Plan Review: Briefing Paper August 2024 Appendix 2 – Draft Blackdown Hills National Landscape Management Plan Review

Section 1 – Summary and Recommendation(s)

Under Part IV of the Countryside and Rights of Way (CROW) Act 2000, Mid Devon District Council, together with other local authorities is required to produce a Management Plan for the Blackdown Hills AONB (now known as National Landscape) and review it at intervals of not more than five years. The Blackdown Hills National Landscape Partnership has performed this duty on behalf of Mid Devon and other relevant local authorities. There is a need for a draft management plan to be published and consulted on before it is finalised and approved by each of the partnership Councils.

Recommendation(s):

To Cabinet to agree that:

The Blackdown Hills National Landscape Partnership undertakes a public consultation on the reviewed Blackdown Hills National Landscape Management Plan for 2025 – 2030 (Appendix 2 to this report)

Section 2 – Report

1.0 Introduction

- 1.1 Part of Mid Devon district is situated within the area covered by the Blackdown Hills National Landscape (formerly known as an Area of Outstanding Natural Beauty).
- 1.2 Under Part IV of the Countryside and Rights of Way (CROW) Act 2000, Mid Devon District Council, together with other relevant local authorities, is required to produce a management plan for the Blackdown Hills AONB (now known as National Landscape) and review it at intervals of not more than five years (exceptionally, Defra authorised a 12-month extension to the review of the current management plan). The Blackdown Hills National Landscape Partnership has performed this duty on behalf of Mid Devon District Council and other relevant local authorities; this work is co-ordinated by the National Landscape team.
- 1.3 The CROW Act (and as amended by the Levelling Up and Regeneration Act 2023) and guidance from Natural England provides advice on the scale, nature and content of management plans. A management plan should serve to highlight a shared long-term vision for the National Landscape and contain ambitions, targets and actions that seek to further the statutory purpose, i.e. to conserve and enhance the designated National Landscape. The delivery of the Plan will be subject to availability of funding from Defra, the local authorities, and other parties.
- 1.3 The Blackdown Hills National Landscape Partnership has taken the opportunity to undertake a more thorough review than in the previous cycle to ensure that the management plan remains fit for purpose and up to date. The management plan is expected to contribute to Government’s Environmental Improvement Plan (including targets) and it is important to make sure that it addresses the significant issues of the climate emergency and nature recovery, taking account of Local Nature Recovery Strategies and Plans and local authority climate action plans.
- 1.4 To help identify important matters and considerations for inclusion, discussions and workshops have been held with key partners, Partnership Management Group, and representatives of partnership organisations, in advance of a wider public consultation on a draft management plan.
- 1.5 The Blackdown Hills National Landscape Partnership has prepared a draft management plan, which is included in **Appendix 2** to this report). A briefing paper is included in **Appendix 1** to this report which explains more about the review process and a proposed structure and content for the management plan. Public consultation on the draft management plan for 2025-30 is proposed to

take place in the late summer / autumn 2024 for a six-week period. Details of specific promotion and engagement opportunities during that period are still to be determined, but an option could be to hold a session with Councillors for example if there were interest. Following the public consultation period, the draft management plan will be revised and a final draft version will undergo formal consultation with the statutory consultee, Natural England. Following this, the management plan will be finalised and recommended by the National Landscape Partnership to the Council (and the other relevant local authorities) for adoption as the statutory management plan for the Blackdown Hills National Landscape.

2.0 Groups consulted

2.1 The Planning Policy Advisory Group (PPAG) considered a briefing paper on the Blackdown Hills National Landscape Management Plan at its meeting on 22nd July 2024 and has given its approval for a public consultation on the draft management plan to take place.

3.0 Next Steps

3.1 The draft Blackdown Hills National Landscape Management Plan will be published on the Blackdown Hills National Landscape website together with details about the consultation. It is expected the consultation will commence in early November and run for 8 weeks. The Blackdown Hills National Landscape website will include details for how and when public comments can be made and where they should be sent to.

3.2 The draft management plan will be updated as necessary by the Blackdown Hills National Landscape Partnership following the public consultation and brought to a further meeting of the Cabinet for its adoption, anticipated in March 2025.

Financial Implications

There are no direct financial implications from the public consultation and the adoption of the Blackdown Hills National Landscape Management Plan. The Council makes a grant funding contribution each year to the host authority, Devon County Council, to support the Blackdown Hills National Landscape Partnership.

Legal Implications

The production of a management plan for the Blackdown Hills National Landscape, and keeping it under review is required under Part IV of the Countryside and Rights of Way (CROW) Act 2000.

Risk Assessment

No operational or strategic risks associated with the matters covered in this report have been identified.

Impact on Climate Change

The review of the management plan is underpinned by a strong commitment to act in response to the climate emergency, with one of the four key themes being Climate, and one of the fundamental aims of the plan being to help facilitate and deliver meaningful actions for climate change mitigation and adaptation. The Government's climate National Adaptation Programme (NAP3) requires all protected landscapes (National Parks and National Landscapes) to have Climate Change Adaptation Management Plans produced, embedded in or linked with their Management Plans by 2028, and in all future plans. The management plan is also expected to address national targets to reduce net greenhouse gas emissions to net zero and restore approximately 130,000 hectares of peat (carbon storage) in Protected Landscapes.

Equalities Impact Assessment

The Landscapes (Glover) Review published in 2019 included proposals to increase the inclusivity and diversity of all the work of AONBs (and National Parks), from governance through to engagement and delivery. The review of the management plan embraces this proposal and is based on some guiding principles including that the valued Blackdown Hills landscape and environment provides an asset to benefit people's wellbeing and therefore everyone should feel welcome and be able to access and enjoy the National Landscape. Further guiding principles recognise that local communities play an integral role in the evolution of the Blackdown Hills landscape, and the need to respond to the needs of people living and working within the area and in nearby towns. An equalities impact assessment will be conducted once the management plan is further advanced.

Relationship to Corporate Plan

The Blackdown Hills National Landscape Management Plan can help the following aims of the Council's Corporate Plan 2024 - 2028:

- **Planning, Environment & Sustainability:** The management plan includes a vision that sets a strategic direction for nature recovery, species, habitat and wildlife management, and also to reduce greenhouse gases, for carbon storage and a pathway to net zero and adaptation. The management plan includes a Protected Landscapes Targets and Outcomes Framework (TOF) to achieve a number of targets, including: Goal 1 Thriving plants and wildlife; Goal 7 Mitigating and adapting to climate change and Goal 10 Enhancing beauty, heritage and engagement with the natural environment.
- **Economy & Assets:** The management plan's vision sets a strategic direction for economy and transport.

- Community, people and equalities: The management plan's vision sets a strategic direction for community, access, and inclusion.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett

Agreed by or on behalf of the Section 151

Date: 1 October 2024

Statutory Officer: Maria de Leiburne

Agreed on behalf of the Monitoring Officer

Date: 1 October 2024

Chief Officer: Stephen Walford

Agreed by or on behalf of the Chief Executive/Corporate Director

Date: 1 October 2024

Performance and risk: Steve Carr

Agreed on behalf of the Corporate Performance & Improvement Manager

Date: 26 September 2024

Cabinet member notified: (yes/no)

Report: Exclusion of the press and public from this item of business on the published agenda on the grounds that it involves the likely disclosure of exempt information. (Yes/No)

Appendix: Exclusion of the press and public from this item of business on the published agenda on the grounds that it involves the likely disclosure of exempt information. (Yes/No)

Section 4 - Contact Details and Background Papers

Contact:

Tristan Peat, Forward Planning Team Leader

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Blackdown Hills National Landscape Management Plan Review: Briefing Paper August 2024

1. Introduction

Management Plans are a vital tool to help protect and enhance our National Landscapes¹.

A Management Plan provides a shared long term vision for the National Landscape and contains ambitions, targets and actions that seek to further the statutory purpose, i.e. to conserve and enhance the designated Area of Outstanding Natural Beauty (AONB).

Under the *Countryside and Rights of Way Act (CRoW)*, it is a statutory requirement for local authorities to produce Management Plans for their National Landscapes and to review these at five yearly intervals. The Review aims to reflect significant changes to legislation, policy and the environmental context to ensure that the Plan remain valid and up to date.

The latest review process is well underway for the Blackdown Hills, and the National Landscape team has been tasked with leading this work on behalf of Devon County Council, Somerset Council, East Devon and Mid Devon District Councils.

2. Drivers for change

The Plan must address the significant issues of the *climate emergency* and *nature recovery*, taking account of, and contributing to, *Local Nature Recovery Strategies* and the hierarchy of *climate strategies* and action plans.

Work and priorities for the National Landscape set out in the Management Plan are required to contribute to Defra's *Environmental Improvement Plan (EIP23)*. This sets the goals for enhancing England's natural environment, including the targets to;

- protect 30% of our land and sea for nature through the Nature Recovery Network by 2030 ('30 by 30')
- restore or create more than 500,000 hectares of wildlife-rich habitats outside protected sites by 2042; and, halt the decline in species abundance by the end of 2030, increasing it above 2022 levels by 2042.

Specifically, a *Protected Landscapes Targets and Outcomes Framework (TOF)* sets the ambition for how Protected Landscapes are expected to achieve 3 outcomes from EIP23 through a number of targets:

- Goal 1: Thriving plants and wildlife
- Goal 7: Mitigating and adapting to climate change
- Goal 10: Enhancing beauty, heritage and engagement with the natural environment

The *Levelling Up and Regeneration Act (LURA) (2023)* amended and strengthened the CRoW Act in respect of Protected Landscapes, to;

- Require relevant authorities in England to 'seek to further the purpose of conserving and enhancing the natural beauty' of the National Landscape. This replaces a 'duty of regard' to the purpose in previous legislation.
- Allow the Secretary of State to make provision to require relevant authorities in England 'to contribute to the preparation, implementation or review' of a National Landscape's Management Plan and for the Plan to contribute to meeting specific targets set under the Environment Act 2021.

3. Our response

We have;

- ▶ Reworked the plan into 4 main themes – Place, People, Nature, Climate.
- ▶ Collectively revised the Vision to 2050 and agreed some shared guiding principles (high level statements of intent and ambition; what's needed to realise the vision and meet or exceed national targets and deliver what's needed for the place).

¹ Since 2023, AONBs are known as National Landscapes. The designation remains an Area of Outstanding Natural Beauty (AONB) and is referred to as such in legislation and policy. References here to National Landscape are synonymous with AONB.

4. Structure and content

	<i>Proposed Sections</i>	<i>Remarks</i>
a.	Purpose and role of plan	<i>Its audiences and uses</i>
b.	Policy landscape	<i>Legislative background – CRoW, LURA, EIP, relevant authorities etc. (see sections 1 and 2 above)</i>
c.	Navigation	<i>i.e. the evidence sits behind, action and priorities are front-loaded; how to quickly find the section you need, explain terminology</i>
d.	Special Qualities (summary)	<i>i.e. why is the place special/ reasons for designation and what do we need to conserve and enhance?</i>
e.	Vision 2050	<i>Sets strategic direction</i>
f.	The Themes: Place People Nature Climate	<i>Strategic priorities framework; topics including - Landscape, heritage, land use & land management, ecosystem services Community, access, inclusion, economy, transport Nature recovery, species, habitat and wildlife site management Greenhouse gases, carbon storage, pathway to net zero, adaptation</i>
	- Objectives - Guiding principles - TOF targets*	<i>What we want to achieve See explanation in section 3 above 2030/2040 TOF milestones and what this Management Plan aims to achieve by 2030 towards these (apportionment) *see section 2 above</i>
	- Current status	<i>Where are we currently in relation to the targets and indicators, data in 'State Of' Report</i>
	- Priority Actions - Policies	<i>Concise list of bullet pointed actions What needs to be done to achieve the objective, along with high level actions</i>
	- Evidence	<i>Key issues, opportunities and challenges under Forces for Change. Describes the significance to the Blackdown Hills and the local context</i>
g.	5-year Delivery Plan	<i>High level actions</i>
h.	Annexes	<i>Further detailed information, such as Special Qualities, TOF data, Climate action plans</i>

5. Review process so far

- Identification of forces for change
- Evaluation of current plan, fitness for purpose and its usage
- Appraisal of other plans and strategies (own and others)
- 'State of the National Landscape' report covering range of topics in current Management Plan
- Public survey (online and at some events)
- Stakeholder workshop (audience included Partnership Management Group, representatives of partnership organisations, local councillors, farming representatives, parish councils)
- Workshop with 'community resilience' activists and presentation at Parish Network meeting
- Information exchanges with the other Devon and Somerset National Landscapes

6. Next Steps

The consultation draft will be finalised and then a 6-week period of public consultation on the Draft Plan for 2025-30 is proposed during October to November. Details of specific promotion and engagement opportunities during that period are still to be determined, but an option could be to hold a workshop session with Councillors for example.

The Draft Plan will be revised as necessary, and a final draft version will undergo formal consultation with the statutory consultee, Natural England.

The Management Plan will then be finalised and recommended by the National Landscape Partnership to partner local authorities for adoption by end of March 2025 as the statutory Management Plan for the Blackdown Hills National Landscape.

7. Recommendation

To agree to the Blackdown Hills National Landscape Partnership undertaking public consultation on the reviewed Blackdown Hills National Landscape Management Plan for 2025-2030.



**Blackdown
Hills**
National
Landscape

Blackdown Hills National Landscape Management Plan 2025-2030

Pre-Consultation draft version for local authorities

October 2024

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How to use and navigate this Management Plan

This version of the Blackdown Hills National Landscape Management Plan 2025-2030 is a text only document for the purpose of informing local authority partners prior to public consultation. Ultimately the Management Plan will be published on the Blackdown Hills National Landscape website and available to download in pdf format (or alternative format on request). Maps, images and full design will be included.

The management plan has the following structure:

Introduction [sets the context, explains the purpose and role of the management plan, describes some of the main policy linkages]

Special qualities [describes why the place is special/reasons for designation and what do we need to conserve and enhance?]

Vision to 2050 [where do we need to get to/ direction of travel]

There are then **four themes - Place, People, Nature, Climate**, and the contents of each is organised in the same way under the following headings:

Objective(s) [what we want to achieve for the area]

Guiding Principles [high level statements of intent and ambition, needed to realise the vision and meet/ exceed national targets and deliver what's needed for the place]

Target and Outcomes Framework targets [lists national milestones and identifies what this Management Plan aims to achieve by 2030 towards these milestones (apportionment)]

Current status [headline findings from the 2023 State of the Blackdown Hills report, and where are we currently in relation to the targets and indicators (data provided by Defra) in bullet point/summary format]

Priority actions [concise list of bullet pointed actions, that together collate to form the 5-year Strategic Delivery Plan]

Policies [guides management by setting out what needs to be done and how to achieve the objective(s)]

Evidence [Describes the significance of topics to the Blackdown Hills and the local context, with key issues, opportunities and challenges]

Delivery and monitoring [including a **Strategic Delivery Plan** which will outline the strategic priorities and high-level actions over the 5-year period required to deliver this plan's ambitions, based on the identified priority actions.]

The **Appendices** then set out more detailed information and data relating to;

- **Special Qualities** [a comprehensive description, summary table, overview of associated natural capital and ecosystem services]
- **Planning** [general principles for development proposals and major development]
- **TOF indicators and data**

Additional appendices: climate change, landscape character, habitats and species TBC

Introduction

Purpose and role of the Management Plan

Context

Areas of Outstanding Natural Beauty (AONBs) are nationally important protected landscapes, known as National Landscapes since 2023. The 46 National Landscapes in England, Wales and Northern Ireland cover just under 20% of the UK. Their distinctive character and natural beauty make them some of the most special and cherished places in which to live and to visit.

Together with National Parks, National Landscapes represent our most outstanding landscapes; unique and irreplaceable national assets, each with such distinctive character and natural beauty that they are recognised internationally as a Category V Protected Landscape by the International Union for the Conservation of Nature (IUCN), 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 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.

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

What is the Management Plan for?

The Management Plan blends national and local priorities and seeks to address them in a way that is right for the Blackdown Hills – the landscape, environment, and communities – to make sure the very special character of the area is conserved and enhanced for future generations.

The statutory Management Plan is the single most important policy document for the National Landscape. It sets out the ambition, strategy, and guidance for the conservation and enhancement of the Blackdown Hills National Landscape for the next five years. It is a revised and updated version of the previous Management Plan 2019-2024.

Its purpose is to:

- Highlight the special qualities and significance of the National Landscape

- Present a vision for the future of the National Landscape and set the direction of travel
- Set out objectives and policies to secure the vision
- Define the pace and scale of action required to achieve our vision
- State the condition of the National Landscape and establish measures of success and targets upon which progress can be measured and evaluated

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

- Inform and influence decisions
- Stimulate and prioritise action
- Promote collaboration
- Help co-ordinate and prioritise resources

Who is the Management Plan for?

It has been prepared by the Blackdown Hills National Landscape Partnership on behalf of the relevant local authorities, but it is a plan for the geographic area of the National Landscape (and beyond), not an organisation and provides a framework to help guide all activities affecting the conservation and enhancement of the National Landscape.

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 relevant authority organisations that are required to jointly prepare, adopt and review the Management Plan, and who carry out key functions, such as planning, that affect the National Landscape. The Management Plan, in its entirety, establishes the management policy of the responsible authorities.
- National Landscape Partnership organisations – these organisations will have a key role in delivering and championing the Management Plan
- Relevant authorities – all public bodies and statutory undertakers (including local authorities, government and governmental organisations, parish councils, utilities) have a duty to further the purpose of the National Landscape; this Management Plan will guide them in fulfilling their statutory duties
- Landowners, land managers and developers – those who own and manage land in the National Landscape have a vital role to play; the plan aims to guide, support and attract resources for sensitive management of the National Landscape
- Local communities and businesses and visitors – all who live and work or visit the Blackdown Hills can play an active role in caring for the National Landscape; the plan identifies some of the priorities for action and ways to become involved

- Others such as funding bodies, third-sector and voluntary groups and organisations, who may refer to the plan or use it to gain a greater understanding of the issues affecting the area.

This plan is ultimately about partnership working to make the vision a reality.

Guiding principles for partnership and management

Principle 1: The management plan will be used to direct strategic leadership in the delivery of meaningful benefits to the landscape, communities and economy of the Blackdown Hills National Landscape, while relevant authorities will seek to further the purpose of conserving and enhancing natural beauty in the conduct of their functions and decision making.

Principle 2: Collaboration, co-ordination and partnership is to be encouraged amongst the wide range of national, regional and local agencies and organisations to secure appropriate funding and support for the care and enhancement of the Blackdown Hills.

Principle 3: The National Landscape Partnership is the central vehicle to promote the roles and activities of all those involved in conserving and enhancing the Blackdown Hills National Landscape, and to showcase innovation and best practice.

Principle 4: We will monitor and report on the state of the National Landscape utilising tools such as the Protected Landscapes Targets and Outcomes Framework and local measures so that management interventions can be kept under review.

Policy landscape

Although generally now known as National Landscapes, 'Area of Outstanding Natural Beauty' (AONB) remains the legal term for the designation and so is the terminology used in this section.

Legislation

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:

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* placed 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* placed a statutory duty on local authorities to prepare and review a Management Plan for each AONB in their administrative area.

The **2023 Levelling Up and Regeneration Act (LURA)** places a stronger requirement on partners such as local authorities and public bodies (known as relevant authorities) to conserve and enhance Protected Landscapes. It amends the Countryside and Rights of Way Act 2000, placing a revised duty on relevant authorities:

‘In exercising or performing any functions in relation to, or so as to affect, land in any [Protected Landscape] in England, a relevant authority must *seek to further* the specified purposes’. This replaces the existing duty to “have regard to” the specified purposes.

It also grants powers to the Secretary of State to make regulations to:

- direct a relevant authority in the discharging of the duty,
- require a protected landscape management plan to contribute to meeting any national environmental target set under the Environment Act 2021;
- set out how a management plan must further the purposes of the designation;
- require and set out how a relevant authority must contribute to the preparation, implementation and review of a management plan.

Defra and Natural England policy

Under the umbrella of the UK Government’s 25 Year Environment Plan (2018) the work and priorities of the National Landscape, as set out in the Management Plan, are required to contribute to Defra’s [Environmental Improvement Plan](#) (EIP23). This sets the UK goals for enhancing the natural environment, including the target to protect 30% of our land and sea for nature through the Nature Recovery Network by 2030 (the so-called ‘30 by 30’ commitment which arises from the UK’s commitments at the COP15 Biodiversity summit), and the target to restore or create more than

500,000 hectares of wildlife-rich habitats outside protected sites by 2042. It also seeks to halt the decline in species abundance by the end of 2030 increasing it above 2022 levels by 2042. The ambition is to achieve high quality, accessible, natural spaces with increased biodiversity close to where people live and work, with a focus around the equal distribution of environmental benefits and resources to all.

Specifically, a *Protected Landscapes Targets and Outcomes Framework* [Protected Landscapes Targets and Outcomes Framework](#) (PLTOF) sets the ambition for how Protected Landscapes are expected to achieve 3 outcomes from EIP23 through a number of targets:

- Goal 1: Thriving plants and wildlife
- Goal 7: Mitigating and adapting to climate change
- Goal 10: Enhancing beauty, heritage and engagement with the natural environment

The Protected Landscape targets are non-statutory and create a shared ambition for all 44 of England's Protected Landscapes. The targets are for the Protected Landscapes as places (the geographic area covered by the designation). Action will be coordinated by Protected Landscape bodies through their statutory management plan, and it will be the responsibility of all stakeholders, partners and land managers in the area to support their delivery.

Most of these changes follow recommendations made within the [Landscapes Review 2019](#), an independent review of Designated Landscapes (National Parks and AONBs) in England commissioned by the Government and led by Julian Glover. 'The Review aims not to diminish the character or independence of our designated landscapes, or to impose new burdens on them and the people who live and work in the areas they cover. Instead, its purpose is to ask what might be done better, what changes could assist them, and whether definitions and systems which, in many cases date back to their original creation, are still sufficient.'

The Review was published in 2019 and produced twenty-seven proposals including;

- AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes
- The state of nature and natural capital in our national landscapes should be regularly and robustly assessed, informing the priorities for action, and
- Strengthened Management Plans should set clear priorities and actions for nature recovery including, but not limited to, wilder areas and the response to climate change (notably tree planting and peatland restoration). Their implementation must be backed up by stronger status in law.

Other key policy influences

Local Nature Recovery Strategies

The Management Plan review needs to take account of the [Local Nature Recovery Strategies](#) for [Devon](#) and [Somerset](#) which are currently under development. These are being prepared as part of a statutory duty on responsible authorities (the two county councils in our case), enshrined in the Environment Act 2021 to work with stakeholders across the public, private and voluntary sectors to agree priorities for

nature's recovery, map the most valuable existing areas for nature, and establish shared proposals for action to be taken to recover nature.

Climate action planning

The Management Plan will be influenced by the Somerset Climate Emergency Strategy [Somerset's Climate Emergency Strategy](#) and the equivalent Devon Carbon Plan [Devon Carbon Plan – Devon Climate Emergency](#), plus Climate Adaptation Strategy for Devon, Cornwall and the Isles of Scilly [Adaptation Strategy – Devon Climate Emergency](#).

Local Plans

Planning policy and decisions to conserve and enhance the natural beauty and character of the National Landscape are the responsibility of local authorities. This does not mean that there should be no development but that any development should complement the character of the landscape, be sustainable and be of an appropriate scale and nature.

Any development proposal must be in accordance with the relevant local authority's Development Plan, including core strategies, local plans, neighbourhood plans and any supplementary planning documents adopted by the authority. This includes adopted local plans in the former Somerset districts of [Somerset West and Taunton](#) and [South Somerset](#), [East Devon District Council](#) and [Mid Devon District Council](#).

Agri-environment funding

A major vehicle for the delivery of actions advocated in the Management Plan, with respect to land management, is the suite of payment schemes which are either already available, or under development by Defra to replace the agri-environment schemes which used to be part of the UK's farm support under the CAP. Broadly falling under the heading of [Environmental Land Management](#), the key ones of relevance for the Blackdown Hills are the [Sustainable Farming Incentive](#), [Countryside Stewardship](#), [Farming in Protected Landscapes](#) (operated by the National Landscape locally) and [Landscape Recovery](#).

Special qualities

The Blackdown Hills National Landscape 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 designated 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 National Landscape.

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.

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

It is an area notable for its unspoilt rural character, which remains relatively undisturbed by modern development and so ancient landscape features, special habitats, historical and archaeological remains have survived intact. In the winding lanes, the hidden valleys and traditional villages there is a sense of stepping back in time; of release from the stresses of everyday living; of the links between nature and humanity. The countryside remains largely unchanged and there is an identifiable and characteristic vernacular, pastoral landscape.

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

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. There are long views over field-patterned landscapes. Ancient, species-rich hedgerows delineate the fields and define the character of the landscape, enclosing narrow twisting lanes. The open plateau is dissected by steep valleys, the

slopes supporting a patchwork of ancient woodland. The history of medieval and parliamentary enclosures has resulted in a contrasting landscape of small fields in the valleys and larger fields with straight hedges on the plateau. There are patches of heath and common, bog and mire and there are fine avenues of beech along the ridge. At a more detailed level there is a variety of visual and ecological interest; heathland birdlife, ground flora of woodland and mire, and colourful wildflowers on hedgebanks.

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 such buildings and where the vernacular character is particularly well preserved. Predominant materials are chert and cob with thatch, over time often replaced by corrugated iron, or clay-tiled roofs. The appeal lies in the way in which the buildings fit so naturally into their surroundings.

Further information about the special qualities of the Blackdown Hills is included in the [appendix. \[link to be inserted\]](#)

Vision

Our vision is that in 2050, as a result of collaboration and positive change, the Blackdown Hills will be a rich and vibrant landscape where:

Thriving, diverse communities, with a strong sense of place and wellbeing, are sustained by a connection to the land and a rich local culture. Living and working sustainably in and around the area, they underpin the prospering local economy and can access the services they need.

Sense of place is maintained and strengthened, characterised by small villages and hamlets set within a distinctive panorama of wide plateaux bisected by deep valleys, containing an intimate patchwork of fields, woodlands and extensive hedges, all shaped by the unique geology.

Farming and land uses work successfully within the natural tolerances of the land to create a resilient place, providing food, fuel, timber, clean water and other wider benefits needed by society, nurturing the area's rich resources for future generations.

Wildlife and habitats are in good condition, diverse and abundant, species moving freely through a connected and healthy landscape.

Our collective heritage is conserved and celebrated, keeping alive traditional skills.

Everyone seeking inspiration and enjoyment of its landscape and natural benefits is welcomed and can readily access and experience this special place.

Delivering the vision

Over the next 25 years, the Blackdown Hills National Landscape is facing a number of drivers of change which have the capacity to impact significantly on its core character, and which need to be addressed in this plan period, not least the interconnected threats of the climate emergency and biodiversity crisis. Collectively we can mitigate these and other threats if concerted and urgent action is taken now. The challenge will be to capitalise on the Blackdown Hills' ability to restore nature, grow healthy food and reduce carbon emissions while supporting vibrant and diverse rural communities – and fundamentally, the evolving landscape and special character of the Blackdown Hills is at the heart of all we do and the decisions we make.

Place

It is the diverse landscapes, the distinctive villages, the historic and natural environment, that give the Blackdown Hills its special sense of place. This section of the management plan focuses on sustainable and resilient land use and land management that is central to conserving and enhancing the natural beauty of the area. It covers landscape, natural resources and natural capital, farming, forestry and land management, historic environment and geology, planning, development and infrastructure.

Objectives

To restore, conserve and enhance the natural capital stock of the Blackdown Hills National Landscape and maximise the flow of ecosystem goods and services it provides.

To support sustainable farming, forestry and land management practices that conserve and enhance the special qualities of the Blackdown Hills National Landscape and deliver a range of ecosystem services

To strengthen the Blackdown Hills special sense of place, with a diversity of landscape patterns and pictures, unique geology and buildings of architectural appeal, through sound custodianship

Guiding principles

Principle 1: The distinctive character and special qualities of the Blackdown Hills need to be recognised, understood and valued if natural beauty is to be conserved, enhanced and restored.

Principle 2: Our historic environment and 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 Blackdown Hills.

Principle 3: We need to ensure that any development and infrastructure affecting the National Landscape is of the highest quality; sensitive to landscape setting and historic character, conserving and enhancing wildlife and other special qualities.

Principle 4: All those whose actions affect the landscape work together to allow nature and natural processes to thrive, as a foundation of a productive, healthy rural economy.

Principle 5: Soil health is restored and nurtured; rivers and streams flow clean and other ecosystem services are provided to society as a result of sustainable land management.

Targets

These are the [Protected Landscape Targets and Outcomes Framework](#) targets that we will contribute to:

Target 5

- Ensuring at least 65% to 80% of land managers adopt nature friendly farming on at least 10% to 15% **of their land by 2030**

Target 8 (*to be apportioned*)

- Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).
- If the target was pro rata'd based on this Protected Landscapes' area (i.e. 3% of the Protected Landscape area itself, not the area of existing woodland) without any local factors this would be **1,108.76 ha**. This would be equivalent to **39.60 ha** per year between 2022 and 2050. The total amount of woodland within the BHNL in 2050 would then be 9,302.93 ha.

Target 10

- Decrease the number of nationally designated heritage assets at risk in Protected Landscapes

Current status

Headlines from State of the National Landscape report 2023:	
Natural resources and natural capital	
Air quality	Particulate matter (PM2-5) levels low in the area but with a hotspot around Hemyock. Sulphur dioxide (SO ₂) levels are low in the area but with hotspots at Hemyock, Dunkeswell and near to Axminster.
Change in weather patterns	9-millimetre increase in annual rainfall and a rise of 0.3°C in annual temperature over the last 30 years.
Soil organic carbon stock	5% increase in carbon accumulating in the soils and vegetation between 2017 and 2021.
Surface water flood risk	Low risk
Additional data from Defra: Water Framework Directive (WFD) River waterbodies (rivers, canals and surface water transfers) within Protected Landscapes	<ul style="list-style-type: none"> • Length of waterbodies within each status (km): 122 km moderate status (19 waterbody catchments), 24km poor status (9 waterbody catchments), 0.8km bad status (2 waterbody catchments)

Headlines from State of the National Landscape report 2023:	
	<ul style="list-style-type: none"> • WFD groundwater waterbodies- 4 in high status, 3 in good status
Landscape	
Light pollution	Satellite images suggest that there is very little light pollution in the National Landscape. A noticeable increase of light spillage from Chard and Taunton conurbation. Increasing spillage from some communities within the area, noticeably Dunkeswell, Hemyock and around Yarcombe.
Noise pollution	National noise mapping suggests that the extent of traffic noise from major roads is limited in the National Landscape. Most recent data is for 2017.
Historic environment	
Number and condition of heritage assets	There are 770 Listed Buildings and 26 Scheduled Monuments. Of these, 8 assets are at risk; this is a minor improvement since 2019.
Conservation Areas	There are ten Conservation Areas within the National Landscape. None are deemed as at risk.
Farming and Land Management	
Agricultural land-use	78% of the National Landscape is under agriculture (2021).
Change in farm number and size	During the last ten years the number of holdings has remained at around 625 42% are less than 20 hectares in size and 44% are between 20-100 hectares in size. 48% are recorded as lowland livestock grazing.
Livestock numbers	Poultry (1,006,928 animals), a 7% increase since 2016. Sheep (22,573 breeding ewes), a 6% decline since 2016. Cattle (17,965 animals), with a 5% decline since 2016.
Employment	9.8% of the resident population employed in farming.
Land in agri-environment schemes	The area has decreased from 11,793 ha in 2017 (27% of the National Landscape) to 8,246 ha in 2021 (22.8% of the National Landscape)

Headlines from State of the National Landscape report 2023:	
Total annual values of agri-environment agreements	£2,113,434 (2021); up from £1,017,856 (2017)
Planning and Development	
Number and change in Neighbourhood Plans	8 made Neighbourhood Plans (all in East Devon)
Number of new dwellings	Approval given for one affordable housing scheme since 2017

Priorities for action

- Target 5 will be mainly met through the three components of ELM. The current uptake of agri-environment schemes (AES) is relatively low at 18% of the National Landscape (6,800 hectares)- see stat 12 in annex. Therefore, a priority is to increase the uptake of appropriate AES options, aiming for 75%+ of Sustainable Farming Incentive (SFI), to underpin Countryside Stewardship and Landscape Recovery additional take-up. This will require significant promotion and close working with the land management community, via trusted local advisers.
- There is a round 2 Landscape Recovery scheme in the National Landscape - Luppitt- and the potential for another (Upper Axe- round 1) to be extended in the future. Adding value and supporting these schemes is a priority, along with rolling out successful Landscape Recovery type management to other areas in the Blackdown Hills.
- Target 8- (apportioned)- tree canopy current and woodland cover (combined) is currently 14.7% of the National Landscape i.e. 5379 hectares. Increasing combined cover by 3% of total land area (**1108.76** hectares) by 2050 will require significant new tree planting, restoration of currently undermanaged woodlands (to promote regeneration) and restoring/ re-creating trees outside woods habitats. Five- or ten-year milestone targets (towards the 2050 target) will be agreed via TOF apportionment workshops with the other protected landscapes. Significant ELM investment will need to be made and woodland advisory support provided for willing landowners (including relevant authorities), applying the 'Right Place Right Tree' principles. The Somerset and Devon Tree Strategies will also help guide and support.
- Step up the action required in order to work with land managers and partners to tackle Water Framework Directive (WFD) failures, linked to drinking water/ resource (including drought), surface quality and downstream coastal waters.
- Continue to promote, deliver and advocate for 'mainstreaming' natural based solutions as a mechanism to provide resilience to property and infrastructure,

both within the National Landscape, but also importantly downstream, where there are major critical infrastructure 'receptors' that are at risk from flooding and where building resilience is only possible through upstream interventions. Such nature based solution interventions rely on land managers to collaborate at scale and the Landscape Partnership play a key role here, to help support, incentivise and deliver.

- Continue to support the farming and land management community through agricultural transition, via farm facilitation support programmes and responding to the needs of an ever changing agricultural policy backdrop and the need to/incentive to provide ecosystem services for society, including green finance. The National Landscape Partnership play a key convening, supporting and deliver role here.

Policies

Landscape, natural resources and natural capital

PL1 Approach the conservation and enhancement of the National Landscape according to landscape-led principles, based on landscape character, underpinned by a sound understanding of the area's rich stock of natural and cultural capital assets and its value to society in terms of the flow of goods and services.

PL2 The special qualities, distinctive character and key features of the Blackdown Hills National Landscape will be conserved and enhanced, and opportunities will be sought to strengthen or restore landscape character where landscape features are in poor condition, missing or fragmented.

PL3 Promote a catchment-scale, multiple-benefit, collaborative-based approach to soil conservation and restoration, water quality improvements, reducing flood risk, and improving resilience, based on the Otter, Axe, Culm and Parrett/Tone catchments.

PL4 Approaches to flood risk management and erosion control which work with natural processes, conserve the natural environment and improve biodiversity will be advocated and supported.

Farming, Forestry and Land Management

PL5 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 National Landscape.

PL6 Promote, encourage and support widespread take-up of Environmental Land Management schemes that help conserve and enhance natural beauty and deliver a

range of environmental outcomes through sustainable farming and forestry practices.

PL7 Encourage the production and marketing of local food and other agricultural products where these are compatible with the National Landscape and purpose of designation

PL8 Encourage sensitive management of field boundaries and hedgerow trees, woodlands and orchards, protect ancient woodland and veteran trees, and restore the original broadleaved character of plantations on ancient woodland sites

PL9 Encourage woodland creation and expansion that considers both the ecological value and landscape character of a site and surroundings and opportunities for maximising ecosystem services including natural flood management

PL10 Monitor, manage and mitigate damaging diseases such as ash dieback that have potential to impact negatively on landscape and biodiversity

PL11 Wider community engagement with the farming and land management sector will be encouraged to enable a deeper understanding and appreciation of the important role played by land managers in maintaining the National Landscape's special qualities.

Historic environment and geology

PL12 Conserve and enhance the historic built environment and rural heritage assets, support training in traditional heritage skills, and promote the use of Historic Environment Record (HER), historic landscape characterisation and other tools to inform projects, policymaking and management activities.

PL13 Monitor the extent and condition of historic sites, features and landscapes across the Blackdown Hills and seek to address sites and features in poor and declining condition.

PL14 Promote awareness and understanding of the geology and geomorphology of the Blackdown Hills and secure effective management of important features and sites.

Planning, development and infrastructure

PL15 All relevant strategic, local and neighbourhood plan documents and planning decision-making will;

- seek to further the conservation and enhancement of the National Landscape;
- utilise the Management Plan and consider other Blackdown Hills statements and guidance, and
- ensure that conserving and enhancing landscape and scenic beauty is given great weight.

PL16 All necessary development affecting the Blackdown Hills National Landscape will conserve and enhance natural beauty and special qualities by:

- Respecting landscape character, settlement patterns and local character of the built environment,
- Being sensitively sited and of appropriate scale,
- Reinforcing local distinctiveness, and
- Seeking to protect and enhance natural features and biodiversity

PL17 Promote and protect tranquillity and dark skies by minimising intrusive noise and development and light pollution that may undermine the intrinsic character of the National Landscape.

PL18 The character of skylines and open views into, within and out of the National Landscape will be protected and enhanced.

PL19 The deeply rural character of much of the land adjoining the National Landscape boundary forms an essential setting for the Blackdown Hills and care will be taken to maintain its quality and character.

PL20 Community-led planning tools, such as neighbourhood plans, and initiatives such as Community Land Trusts will be supported as the principal means of identifying need and securing local community assets such as affordable housing. Any development should conserve and enhance natural beauty.

PL21 Road and transport schemes (including design, maintenance, signage, landscaping and safety measures) affecting the National Landscape will be undertaken in a manner that is sensitive and appropriate to landscape character and special qualities, seeking to further the purpose of designation. The landscape, biodiversity and cultural features of the area's road network such as hedge banks, flower-rich verges, and locally distinctive historic highway furniture, will be protected, conserved and enhanced.

Evidence

Natural Capital and ecosystem goods and services

Restoring a good quality and condition of the natural and cultural capital stock (including 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 (further details are included in the [Special Qualities appendix](#) [link]). For example, 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 tackling pollution and improving water quality for drinking water through initiatives such as South West Water and partners' [Upstream Thinking](#). There are a considerable number of properties in the Blackdown Hills that are not connected to mains water, and therefore rely on water from springs, boreholes and wells. These can be particularly

sensitive to rainfall and drought, over abstraction by other users, water quality and contamination risks, which all require consideration.

The Blackdown Hills forms part of the headwaters of the rivers Culm, Yarty (running to the River Axe), Otter and Tone. People well outside the National Landscape are therefore affected by how land is managed for flood risk and water quality. The rivers that originate in the National Landscape flow downstream through larger towns and villages outside of the National Landscape which are more prone to flooding. As such, land management in the upper river valleys can play a key role in helping to reduce flood risk 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 can align, leading to overtopping and flooding of settlements, the M5 motorway and the main railway line. Connecting the Culm is a long term, multi-agency approach to tackling some of the issues in the river corridor and focusing on nature-based solutions to address them. Natural flood management works with natural processes to 'slow the flow' of flood waters. This helps to reduce the maximum water height of a flood (the 'flood peak') and/or delay the arrival of the flood peak downstream, increasing the time available to prepare for floods. Managing the natural resources of the Blackdown Hills (including mires that act as natural sponges and woodland planting in appropriate locations), sustainable drainage systems, and ecological river restoration projects are important components of natural flood management.

It is widely accepted that some development and land management practices in water catchments are increasing nutrient loadings, storm water runoff rates, siltation and pollution incidents that are impacting downstream. The knock-on consequences can have much wider implications, as exemplified by the requirement for new development not to cause increased nutrient pollution to certain protected sites (locally the river Axe SAC and Somerset levels and Moors Ramsar site), which has caused significant delays to development proposals in the last few years. Diffuse pollution and nutrient enrichment are factors affecting water quality in the National Landscape. Indeed, 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 such as the Catchment Sensitive Farming programme operate across all the catchments.

Parts of the eastern and western fringes of the National Landscape 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. Northern parts of the National Landscape are within a Drinking Water Safeguard Zone (Surface Water), where actions may be required to avoid deterioration in quality of drinking water supplies.

Landscape

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.

Our landscapes have evolved over time, and they will continue to evolve – change is a constant, but outcomes vary. The management of change is essential to ensure that we achieve sustainable outcomes – social, environmental and economic. Decision makers need to understand the baseline and the implications of their decisions for that baseline. The process of Landscape Character Assessment has an important role to play in managing and guiding change.

Landscape character describes the qualities and features that make a place distinctive. It can represent an area larger than the National Landscape or focus on a very specific location. The Blackdown Hills National Landscape displays a variety of landscape character within a relatively small, distinct area. These local variations in character within the National Landscape are articulated through the Devon-wide [Landscape Character Assessment](#) (LCA), which describes the variations in character between different areas and types of landscape in the county and covers the entire National Landscape. There are Devon Character Areas, named to an area sharing a unique and distinct identity recognisable on a county scale and Landscape Character Types (LCTs), each sharing similar characteristics. Hidden characteristics and past land uses are identified in county-based Historic Landscape Characterisation (HLC).

These assessments are used in planning and land management to understand and describe the landscape and manage pressures for change and are central to a landscape-led approach in planning and design. Under this approach plans, policies and proposals are strongly informed by understanding the essential character of the site and its landscape context and creates development which is locally distinctive, responds to local character and fits well into its environment; it needs to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and create sustainable and successful places for people.

Further information about the assessments that cover the National Landscape, descriptive information about the character areas and character types relevant to the Blackdown Hills and links to associated documents can be found in the annexe [link to be added].

One of the special qualities of the Blackdown Hills National Landscape 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 National Landscape 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 Hembury Hillfort.

The setting of a National Landscape 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 National Landscape 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, associated with the visual experience and aesthetic appreciation. Views are particularly important to the Blackdown Hills. 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 National Landscape may be lost or degraded.

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 and 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.

Dark, expansive 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 National Landscape in England, with very low levels of night-time brightness; 95% of the area is in the two very darkest categories as evidenced by 2016 research by CPRE.

The Blackdown Hills National Landscape 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 National Landscape's unique historic character. Designated heritage assets include 770 Listed Buildings (13 Grade I, 47 Grade II* and 710 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, and there is also one Listed Building at risk. Understanding and addressing the reasons for these assets being at risk is key to meeting the relevant target in the Targets and Outcomes Framework.

The geology of the Blackdown Hills 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.

Below the surface are 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 Blackdown Hills 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. The National Landscape has two geological SSSIs covering 3.5ha – Furley Chalk Pit and Reed’s Farm Pit, which are both in unfavourable condition.

The Blackdown Hills National Landscape is significant for its geology and geomorphology with some features unique to the area. The geology influences the landscape, soils and biodiversity and has played a significant role in the area’s industry and heritage. It is vital that this geological resource is protected, conserved, enhanced, promoted and better understood. Exploration and research into the geology of the National Landscape should be continued to improve understanding of the landscape, and of the geological resource and its importance to inform the conservation and management of geological sites.

Farming and land use

Farmers and land managers are the main stewards of the landscape, and their actions which help maintain natural beauty and the special qualities of the National Landscape should be supported. The farmed area reflects centuries of land management practices and traditions which remain at the heart of our rural communities, producing high quality food, maintaining and shaping the landscape. Farming has a key role to play in protecting the environment by keeping air and rivers clean, improving soils and providing wildlife habitats.

The agricultural sector is in a period of major change especially funding and market uncertainties while arrangements for post Brexit environmental land management system is still developing. Broadly, existing government direct payments to farmers are being phased out and a new system will recognise and value broader societal benefits with payments being based on the provision of public goods.

Key challenges and changes in agriculture have implications for conserving and enhancing natural beauty. 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 more suburban appearance. On the other hand, new land managers can bring new opportunities, resources 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. New crops for energy generation (such as anaerobic digestion) are also a driver for change, while use for recreation or tourism activities is sought on other land.

Soils are one of the most valuable natural resources we have. Healthy soil supports a range of environmental, economic and societal benefits. These include food production, climate change mitigation and increased biodiversity. Poor soil management or inappropriate land use can cause soil degradation, which reduces the ability of soil to perform these vital functions. Soil health also underpins the unique character and distinct form of the area's landscape and biodiversity.

Regenerative agriculture is a suite of practices that put soil health front and centre, allowing farming to be more in tune with nature. As a result, it is seen as a more climate resilient approach to farming whilst also supporting nature recovery. Regenerative agriculture starts with building healthy soil by focusing on rebuilding organic matter and the natural living biodiversity in the soil. This improves the ground's ability to:

- draw down carbon from the air and store it underground,
- hold and clean water,
- help wildlife above and below the ground,
- produce nutrient-dense food year after year.

Regenerative agriculture also delivers on climate change via minimally disturbing soils, which improves soil carbon storage and sequestration, and aids nature recovery from the ground up.

Trees and woodland

There are many reasons why new tree planting is important, at a local and global level, not least in society's response to climate change, both in terms of increasing offsetting of carbon, and to mitigate the impact of climate change. For example, new planting in strategic locations can reduce the risks of flooding, while planting a diverse range of species can create resilient ecosystems that can cope with changing weather patterns such as prolonged periods of dry weather.

However, careful principles of woodland creation and design objectives are required to maximise the potential benefits and ensure that the woodlands have a strong chance of developing and thriving into the long term. Furthermore, any new planting also has the potential to bring a range of benefits locally and that opportunity should be understood. For example, consideration needs to be given to the suitability of the land to support different woodland types; the surrounding habitats that the new

planting could connect with; and the opportunities to work with the local landscape and cultural heritage to deliver multiple benefits, whether nature recovery or public access. As a principle, all new woodland creation and planting schemes should consider the scheme's impact on landscape, biodiversity and heritage from the outset, utilising landscape character assessment and Devon's [Right Place Right Tree Guidance](#).

Both ancient woodlands and veteran trees represent a historic part of the landscape and past land use given they have been undisturbed by development and human activity. Furthermore, they are known to host a diverse array of plants, fungi, birds and insects due to their undisturbed soil and decaying wood, providing optimum growth conditions. They are also a significant carbon store as they have been sequestering atmospheric carbon for centuries. Their support for conservation and climate change mitigation, as well as their status as iconic monuments of our landscape, means ancient woods and veteran trees are widely valued as an irreplaceable resource. 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.

Tree diseases pose an increasing and significant pressure on the natural beauty of the Blackdown Hills, for example ash dieback especially where ash is a dominant tree in and outside woods and/or hedgerow component.

Effective woodland management is essential for growing timber of high value, but it also supports delivery of ecosystem services. Thinning out trees increases their capacity to sequester carbon and enhances their habitat quality as more light is let through. This form of low-intensity management is particularly supportive of good-quality and young-medium age trees which are most efficient at sequestering carbon. Well-managed woodlands also lead to thriving habitats that support wider ecosystems.

On one hand, more productive forestry, including conifer crops where appropriate to the landscape, has a role to play in sustaining economically viable landholdings that can continue to provide a wide range of ecosystem services. Alternatively, community woodland management 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.

Hedges are an integral landscape feature to the Blackdown Hills, of historical importance, defining the farmed landscape, and supporting wildlife, while also helping to control soil erosion and reduce flooding. The well-established Blackdown Hills Hedge Association continues to promote the traditional hedge-laying management of hedgerows through training courses, competitions and other events.

A spotlight on planning and land use

Villages, hamlets, farmsteads, 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 National Landscape and around it, is of key importance in maintaining the landscape and scenic beauty of the area.

Planning decision-making is the responsibility of the local 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 to further the purpose of conserving and enhancing natural beauty in all their actions affecting a National Landscape.

The NPPF provides specific planning guidance for plan-makers and decision-takers in relation to National Landscapes (albeit that references in it are to Area of Outstanding Natural Beauty/AONB). The latest version was published in December 2023, and confirms that National Landscapes [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 should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Also, 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.

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 are addressed with references to protecting tranquil areas and intrinsically dark landscapes - special qualities of the Blackdown Hills. 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 National Landscape, 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 National Landscape. The availability of a range of affordable housing (as defined in the NPPF), 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 183.

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. However, in the context of the relevant NPPF paragraphs, the potential for harm to the National Landscape 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, the quantum of development, duration, permanence or reversibility of effects. Harm to the Blackdown Hills National Landscape 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. There is further information on the consideration of 'major development' in the appendix[to be linked].

Role of the management plan

The management plan aims to promote consistency and co-operation between local planning authorities, both in setting policy and dealing with planning applications within the National Landscape, to conserve and enhance natural beauty across the area. National Landscape management plans can be a material consideration in planning decisions.

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 Blackdown Hills Design guide for houses and Good lighting guide. It is expected that further design/planning guidance will be prepared during the life of this plan.

Considering natural beauty in planning proposals

It is important that impacts on the Blackdown Hills National Landscape are properly recognised and accounted for in decision making. In an area like the Blackdown Hills where timelessness and escape from the modern world are 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/homeowners 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 National Landscape'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 National Landscape 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 area 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.

The layout, form and density of all new developments need to reflect the historic rural grain of the National Landscape . 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 National Landscape , 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 the sense of place.

Development proposals in or affecting the Blackdown Hills should avoid sensitive locations that will impact on the special qualities of the National Landscape – 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.

A major challenge in more rural areas of the Blackdown Hills, 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, which are increasingly taller and larger, at odds with an inherently small-scale landscape, 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.

Roads and traffic

Inevitably most people in rural areas need a vehicle to access employment, services and other opportunities. Nevertheless, reduction of unnecessary car use will

contribute to reducing carbon emissions, quality of life and conservation of the area's natural beauty. In terms of supporting that shift, the availability of electric vehicle charging points is expanding but is still very limited.

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. The design and management of the rural road network should reinforce the local character and distinctiveness of the national Landscape. The distinctive character of minor roads contributes to the character of the wider landscape and they are an important means for people to experience the area. Insensitive, overengineered changes to these roads can have a detrimental impact. The increasing use of larger heavy goods vehicles is having damaging impacts.

Road improvement schemes within and outside the National Landscape should not increase noise pollution or emissions from traffic. Approaches such as speed management schemes may, for example, be more appropriate than road widening. Potential impacts within the National Landscape of proposed road improvement schemes beyond the boundary should be considered. Road management and improvement schemes should minimise landscape impact and avoid urbanisation of rural roads – for instance through sensitive and appropriate design and use of materials, and avoiding unnecessary signage clutter, road markings and coloured road surfaces. Wildflower-rich verges should be managed appropriately and traditional features such as fingerposts and milestones should be retained.

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 Blackdown Hills. 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 National Landscape and adversely 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 to further National Landscape purposes in carrying out their functions.

Meanwhile, national rail services can be accessed at Honiton and Axminster, as well as Taunton and Tiverton Parkway. There are proposals for a new station at Wellington too.

People

The Blackdown Hills is a living and working landscape, and we want it to stay that way. Shaped by the stewardship and innovation of generations, with collaboration and community spirit at heart, this is what needs to be harnessed to ensure resilience for the future. We also know that the special landscape and environment has much to offer residents and visitors alike. Positive action will help to ensure everyone can enjoy the benefits of living in and visiting the Blackdown Hills National Landscape and contribute to the area's conservation and enhancement.

Objectives

To nurture flourishing communities, where the population is both cohesive and diverse, where there is easy access to a range of services and facilities, and where the commitment of local people helps to conserve and enhance the environment, heritage and landscape of the Blackdown Hills.

To foster a thriving and diverse Blackdown Hills economy that provides jobs for local people, makes wise use of local resources and benefits local communities, while conserving and enhancing the outstanding landscape and distinctive character of the countryside and villages.

To ensure that opportunities to explore and enjoy the Blackdown Hills countryside and its special qualities are available to all and that everyone feels welcome.

To commit to eliminate discrimination, provide equal opportunities, and challenge prejudice and promote foster good relationships between diverse groups in and around the Blackdown Hills.

Guiding principles

Principle 1: Our landscape is a shared resource, providing opportunities for learning and contact with nature, opportunities to experience calmness and tranquillity, a place to inspire and comfort, and to provide the time and space to benefit health and wellbeing.

Principle 2: We must respond to the needs of people living and working within the Blackdown Hills, in nearby towns, and nationally.

Principle 3: Local communities play an integral role in the evolution of the Blackdown Hills – The landscape has been shaped by many generations of people working with the land and nature to develop industries, heritage and culture, and it will continue to change and develop into the future.

Principle 4: Everyone should feel supported and welcome to access, cherish and enjoy the natural environment and the heritage of the Blackdown Hills.

Principle 5: We should support a thriving rural economy that plays a positive role in conserving and enhancing natural beauty and sustains local communities and the farming economy alongside nature recovery.

Principle 6: This is a place where local communities are actively engaged in celebrating the area's cultural heritage, helping to keep skills and traditions alive and sensitively shaping its future.

Targets

These are the [Protected Landscape Targets and Outcomes Framework](#) targets that we will contribute to:

Target 9

Improve and promote accessibility to and engagement with Protected Landscapes for all using metrics based on those in the Defra Access for All programme.

Current status:

Headlines from State of the National Landscape report 2023:	
Access and recreation	
% of area that is publicly accessible	2% of the area
Local economy and communities	
Population	14,130
% of population of working age (20-74 years old)	68% (down from 71% in 2011)
Employment status	56% employed (down 11% from 2011) 2% seeking work (down 1% from 2011) 42% not seeking works (up 12% from 2011)
Employment profile by industry	Transport & Communication the same 2011-2021 Decline in industry since 2011: -7% in land-based employment -1% in distribution, hotel & restaurants Increase in industry since 2011: +6% in manufacturing & construction +3% in professional & public sector
Employment profile by occupation	2011 to 2021: +5% in managerial & professional occupations -5% in skilled trade, administrative and caring occupations All other occupational sectors remain the same
General health of the resident population (%)	83% have good or very good health (no change since 2011) 4% have bad or very bad health (no change since 2011)

Headlines from State of the National Landscape report 2023:	
Disability status of resident population (%)	17% disabled under Equality Act 8% with long-term physical or mental health conditions 75% with no long-term physical or mental health conditions

Priorities for action

1. Target 9 Improve and promote accessibility to and engagement with Protected Landscapes for all will be measured by Defra based on a number of indicators, using metrics from the FiPL programme and Access for All programme. This will only provide part of the picture because some of it relies on data from funded projects rather than a broad picture.

Priorities will be to;

- Capitalise on opportunities to secure physical works to improve accessibility, such as accessible trails, parking and facilities.
- Ensure that projects have opportunities for volunteering and engagement with schools built in.
- For the Blackdown Hills National Landscape Partnership to take positive action to increase diversity within the management group and the voices reflected in decision making.

2. Collecting data so that we have a clear definition and better understanding of equity, diversity and inclusion issues relevant to the Blackdown Hills. Further work needs to be undertaken to deepen our knowledge of the population within the Hills and in the surrounding area and be able to respond accordingly. This includes building relationships among local community organisations and agencies to collaborate on inclusion.

Policies

A landscape for all

Pe1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of opportunities for active engagement with the countryside, wildlife and heritage of the Blackdown Hills that are available and accessible to all, working to ensure that everyone feels welcome to explore and enjoy the area.

Access and recreation

Pe2 Take a coordinated, strategic 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 National Landscape, improves access and connectivity with surrounding areas, avoids impact on sensitive sites and minimises conflict between different interests.

Pe3 Opportunities to use the natural environment resource of the Blackdown Hills to benefit the health and well-being of residents and visitors will be sought and promoted, particularly where this will enhance landscape, biodiversity, heritage and access.

Local economy and communities

Pe4 Local communities will be supported to identify, plan, and provide for their own needs, in undertaking activities to encourage sustainable lifestyles, reinforce and celebrate local cultural traditions, and engagement in cultural and natural heritage initiatives. Support initiatives that help to provide, retain or enhance community facilities and services where they are compatible with conserving and enhancing natural beauty

Pe5 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 Blackdown Hills National Landscape

Pe6 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 conserve or enhance the special qualities of the National Landscape and contribute to employment and prosperity.

Pe7 Tourism and recreation provision will be supported where it contributes to the local economy without harm or detriment to the Blackdown Hills landscape, historic environment, biodiversity or tranquillity, and respecting special qualities.

Pe8 Support efforts to secure and improve fast and reliable broadband and mobile phone coverage without adversely affecting special qualities

Transport

Pe9 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

Pe10 Promote the development of high quality, integrated and sustainable transport services and initiatives in and around the Blackdown Hills where they can be achieved without compromising the conservation of natural beauty and local character

Evidence

A landscape for all

The Landscapes (Glover) Review published in 2019 included proposals to increase the inclusivity and diversity of all the work of AONBs (and National Parks), from governance through to engagement and delivery. It noted that they want our nation's most cherished landscapes to fulfil their original mission for people, providing

unrivalled opportunities for enjoyment, spiritual refreshment and in turn supporting the nation's health and wellbeing. Proposals included a stronger mission to connect all people with our national landscapes; new long term programmes to increase the ethnic diversity of visitors; and landscapes that cater for and improve the nation's health and wellbeing.

We are deeply connected to the natural world, and it is now well understood that exposure to nature and natural environments, especially those of good quality, provides many benefits to physical and mental health to all - at every age, socio-economic status, gender and ethnicity. Meanwhile, a deeper understanding of biodiversity and the natural world affects our connection to it and how we interact with it. Understanding how the rural environment is managed increases environmental awareness and supports appreciation of countryside.

People's opportunity to experience the natural beauty of the Blackdown Hills relies on fair access – for example, to experience the tranquillity of woodlands, to be able to afford to live, farm or work land, or to use the extensive network of public rights of way. However, for a variety of reasons not everyone has equitable access to the natural environment. Barriers are varied and often multi-faceted and may include disabilities which prevent access or limit interpretation and enjoyment, lack of transport, supporting facilities and infrastructure, societal ones such as lack of information, experience or confidence to explore the countryside, and financial barriers.

Being in a position of privilege, because of age, gender, ability, or access, can make it hard to see how it for those who are not, partly because of the structures and systems that privilege gives us access to.

Improving equity, inclusivity and diversity of access for people to enjoy the natural and historic environment of the Blackdown Hills is a key driver for this plan and we need to find innovative local solutions and collaborative partnerships to facilitate and support more people, especially those who would benefit most, to explore and enjoy the area.

One of the key issues identified locally is a limited understanding of who lives in the Blackdown Hills and the surrounding towns. Without this understanding, it isn't possible to understand who the National Landscape is serving and who is under-served. Further work needs to be undertaken to deepen our knowledge of the population within the Hills and in the surrounding area, and be able to respond accordingly.

Below the headline figures for the area from the current Census, research relating to earlier socio-economic data offers a more nuanced population insight that forms a useful baseline and starts to highlight some key issues:

- Generally, there is high proportion of over 65s in the area. The parishes with the highest proportion of people over 65 were Chardstock, Combe St Nicholas, Membury, Dalwood, Kilmington, Combe Raleigh and Shute (35% to 40%). The parishes with the highest proportion of young people were

Monkton, Sheldon, Uffculme, Hemyock, Kentisbeare and Clayhidon (20% to 22%).

- Disability and health. Three Lower layer Super Output Areas (LSOAs) show over 10% of the population having their day-to-day activities limited a lot by disability or ill health. The percentage of people reporting they have bad or very bad health ranges from 2.6% to 6.1% across the Blackdown Hills. Rates of provision of unpaid care range from 9% to 15%
- Ethnicity. The numbers of people within the National Landscape whose ethnicity is other than White British is low (0 to 2.4% in the Devon parishes). There are small populations in the market towns in Devon particularly of people who are Asian/Asian British and of mixed ethnic origin. In Somerset there are areas of Taunton and Wellington with higher-than-average numbers of White Gypsy/Irish Travellers; and Asian people. Areas of Taunton and Chard have higher than average numbers of people of 'white: other' residents.
- Deprivation. Official figures show there is limited deprivation within the Blackdown Hills, with 4 LSOAs in the 5th Decile and the remainder higher (Indices of Multiple Deprivation, measure of relative deprivation, 1 is most deprived, 10 is least deprived). There is, however, high deprivation for access to services and the living environment. Average figures can hide individual households living in poverty. In the surrounding towns, there are areas of deprivation within Chard, Wellington and Taunton, and to a lesser extent in Tiverton and Honiton. Fuel poverty and lack of access to services and poor broadband coverage are all identified as issues across the area.
- Income and Food insecurity. Wages are low in the area, and housing prices high. Mid Devon is in the top 10 nationally (7th) of local authorities with the highest share of children with very low food security (above 20%). The former Somerset West and Taunton also has high food insecurity levels.

Recreation and access

Opportunities and promotion aimed at both visitors and the local community should encourage people to experience the Blackdown Hills more fully in more sustainable and less potentially damaging or disruptive ways. 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 this is a working environment with most of the land in agriculture and in private ownership. However, 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 and outdoor activities. Walking, cycling and horse riding are popular, but people also come to the area for activities as diverse as sky-diving, gliding, motorsports and bushcraft. There is scope to engage with some of these sectors to reach a broader audience and to engender a greater awareness and appreciation of the significance of the area.

The public rights of way (PRoW) network in the National Landscape is extensive (436 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 National Landscape Partnership has a history of producing some circular walks and rides guides, including on-road cycle routes, however there is further scope for collaboration to develop safer routes for walkers, horse riders and cyclists, 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. This would have numerous benefits; it 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 National Landscape for visitors whether or not they are car-owners. One way of delivering this could be green infrastructure provision which 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, and so responsible access is priority as part of comprehensive site management. Other sites with public access include National Trust land such as Dumpdon Hill and at Wellington Monument and several Wildlife Trust reserves.

Devon County Council and Somerset Council are responsible for the PRoW network across the National Landscape, supported by actions by parish councils and volunteers. Rights of Way Improvement Plans (RoWIPs) for their networks set out objectives and priorities that aim to 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 also has committed and active Countryside/Local Access Forums that bring together representatives of many fields of interest including users such as horse riders, landowners, tourism, health, and education which are pertinent to improving access to the countryside.

Traffic and transport

Traffic speed and volume are a real concern for many communities. Routes across the Blackdown Hills are frequently used as short cuts by through traffic, affecting both tranquillity and the environment as well as raising highway safety concerns. Although necessary, lorries and other large vehicles travelling to and from farms and small businesses along narrow lanes cause noise, a risk to other users and damage to the roads, verges and characteristic hedgebanks. Highways 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, the 60mph national speed limits outside villages and public transport.

The availability of public transport is limited in the Blackdown Hills and has seen reductions in services over recent years, which can leave those without access to a car at a serious disadvantage. Where there are bus services they can be very infrequent and do not operate at weekends or evenings, but nevertheless, certain routes that cross the area and connect with surrounding towns do have great potential to offer opportunities for tourism and recreation. Rail services can be accessed at the nearby towns of Taunton, Tiverton, Honiton and Axminster.

Local economy and communities

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

The area is typically characterised by very high numbers of small and micro enterprises and of self-employment, with 95% of registered businesses having 0-9 employees. Many of those who have established small businesses were attracted to the area by the high quality of life provided by the Blackdown Hills environment. There is however still a strong agricultural sector; accounting for around 40% of businesses.

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 the many small businesses within the area.

A key aim is to nurture a diverse and resilient local economy that is not over reliant on one specific 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. It is important that rural areas such as the Blackdown Hills are not overlooked compared to businesses in local towns, and that support is accessible. As part of economic development support on offer from local authorities, Heart of the South West Growth Hub offers free business advice and support services for established businesses and those looking to start-up, linking to business support programmes and organisations.

Tourism in the Blackdown Hills is largely characterised by high-quality accommodation and quiet countryside pursuits. 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 – in other words, focusing on local products and services that do not compromise the landscape and environment. This can bring

benefits by encouraging visitors to explore the local 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. There is also scope to explore the opportunities for a more direct economic relationship between tourism spending and resources to manage the landscape that people come to enjoy.

The landscape has in the past been an inspiration to artists and writers, and the present day Blackdown Hills artists and makers keep this tradition alive, contributing to the local economy and communities, strengthening the cultural associations with the landscape and providing creative opportunities to engage with new and varied audiences.

Rapidly evolving communications technology can attract and enable new economic opportunities and ways of working that have a minimal environmental impact, enable rural businesses to link up for promotion and co-operation, offer new ways of accessing health, services and education, and provide a lifeline for those who are not able to access shops for whatever reason. Over the last 10 years the government has regularly stressed the importance of rolling out superfast and then full-fibre broadband, backing this with a number of dedicated funding schemes. However, throughout the Blackdown Hills plenty of residents and businesses still receive very slow speeds. Ensuring the wide availability of high-speed broadband and mobile connectivity is a central part of the government's National Infrastructure Strategy and levelling up agenda. The government has a target that gigabit broadband and 'standalone' 5G will be available nationwide by 2030. Therefore, it is important to ensure that businesses and communities across the Blackdown Hills can readily access fast and reliable digital connectivity. However, broadband and mobile infrastructure needs to be sensitively sited and located to avoid harm to the area's natural beauty.

Communities within the Blackdown Hills have a strong sense of identity and readily describe themselves as living in the Blackdown Hills rather than acknowledging administrative boundaries. Although sparsely populated with small settlements, most are active communities with a spirit of self-sufficiency and host many social and interest groups and events, centred around parish halls, churches, schools and pubs. Over the years many villages have produced parish plans and village design statements to inform planning and other decisions, and several parishes in the East Devon part of the Blackdown Hills now have adopted neighbourhood plans to influence decisions. Many communities have also produced village guides, walks leaflets and organised heritage and environmental projects.

There is a particularly strong collaborative spirit among like-minded people in the area. The Blackdown Hills Hedge Association, Blackdown Hills Artists and Makers, and Blackdown Hills Transition are well established networks covering a range of interests. Parish councils in the National Landscape form a collective voice through the Blackdown Hills Parish Network, which seeks to identify, address and promote

issues of common concern and seek cohesion among the local authorities and other bodies responsible for the area.

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. Meanwhile, for younger residents, secondary schools are located in surrounding towns, or larger villages in the case of Uffculme, around the periphery, resulting in protracted journeys to and from school, and then a need to travel or leave the area for further/higher education. Loss of young people from communities is a major issue across rural areas and, without employment opportunities and affordable housing, this trend will only continue.

Nature

The biodiversity of the Blackdown Hills National Landscape is intrinsic to the area's character and aesthetic appeal and is diverse, as a result of the area's varied geology and landforms. Its mosaic of priority habitat includes springline mire, heathland, woodland and species-rich grassland, all connected via hedges and banks supports a wide variety of habitats and species.

It supports coherent and resilient ecological networks which exemplify the Lawton [Making Space for Nature](#) principles of 'better, bigger, 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 the delivery of other ecosystem services. Older and more diverse woodlands and hedgerow trees, for example, will benefit biodiversity and improve resilience.

Objectives

To ensure the effective conservation, enhancement, expansion and connectivity of habitats to form coherent and resilient ecological networks across the Blackdown Hills and beyond, facilitating the movement of species of conservation concern across the landscape.

Guiding principles

The guiding principles we adopt locally reflect the principles that National Landscapes across the country are adopting, while also recognising requirements specific to the Blackdown Hills.

- 1) People need nature, wherever they are and whatever their ability or knowledge.
- 2) Soil and water are the foundations of a healthy natural environment.
- 3) We must use our targets as driver to advocate for and seek sufficient resources.
- 4) When meeting our targets, we must not miss the point. (For example, it would be possible to deliver [30 by 30](#) with isolated sites that will not allow species to spread.)
- 5) The natural landscape of the Blackdown Hills should be seen as a functioning whole.
- 6) We will use the Lawton [Making Space for Nature](#) principles ^[3] of 'better, bigger more and joined' to create networks that are fit for purpose for nature to thrive in and adapt to climate change.
 - a) What happens in the Blackdown Hills National Landscape is contributing to something much bigger. The Blackdown Hills is not an island – it links to the surrounding countryside.
 - b) More wildlife habitat in the Blackdown Hills will deliver many wider benefits.

- 7) Beyond Lawton, the mantra of 'right tree, right place' should be extended to 'right habitat/species, right place', allowing nature to flow. This should ensure that scarce and irreplaceable habitats are protected and that the development of one habitat does not damage the network of another.
- 8) Some of the habitats and species in the Blackdown Hills are more threatened than others. We will therefore prioritise habitats and species of conservation concern, guided by the [Blackdown Hills National Landscape Nature Recovery Plan](#).
- 9) We will contribute to delivering the [Devon Local Nature Recovery Strategy](#) and [Somerset Local Nature Recovery Strategy](#).
- 10) We will embrace and promote the latest conservation practice where appropriate.

^[1] <https://stateofnature.org.uk/>

^[2] https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf

^[3]

<https://webarchive.nationalarchives.gov.uk/ukgwa/20130402170324/http://archive.de.fra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

^[4] https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf

^[5] <https://national-landscapes.org.uk/news/crunching-the-numbers-on-30by30>

^[6] <https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework/protected-landscapes-targets-and-outcomes-framework>

^[7] <https://www.legislation.gov.uk/ukpga/2023/55/enacted>

^[8] Target 1 (Restore or create more than 250,000 hectares of a range of wildlife-rich habitats within Protected Landscapes, outside protected sites by 2042 (from a 2022 baseline).

Target 7 (Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050).

Target 8 (Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).

^[9] <https://national-landscapes.org.uk/news/new-targets-and-outcome-framework-for-nature-published>

^[10] <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

Targets

These are the [Protected Landscape Targets and Outcomes Framework](#) targets that we will contribute to:

Target 1:

Restore or create more than 250,000 hectares of a range of wildlife-rich habitats within Protected Landscapes, outside protected sites by 2042 (from a 2022 baseline). Farmers will also be supported to create or restore 30,000 miles of

hedgerows a year by 2037, eventually returning England's hedgerows to 10% above their 1984 peak of 360,000 miles.

- The apportioned target for Blackdown Hills National Landscape is to restore or create more than 2,919.10 hectares of a range of wildlife-rich habitats by 2042, equivalent to 145.96 hectares per year between 2022 and 2042.
- During the lifetime of this Management Plan (2025-30), this equates to 730 hectares.
- 1.7% of the Blackdown Hills National Landscape is designated as a Site of Special Scientific Interest (SSSI). This means that there is significant potential to deliver outside of these nature conservation designated sites, against target 1.
- Note that in the PLTOF datasets, the new categories of 'Grass moorland', 'Fragmented Heath' and 'Good quality semi-improved grassland' (GQSIG) are not actually considered to be priority habitats (by Defra/ Natural England). So, action on grass moorland, fragmented heath and GQSIG that is sufficient to deliver a wildlife-rich habitat outcome (ie to create or restore one of the habitats listed in TIN19, Table 2), and is outside a protected site (SSSI), would count towards Target 1 (not target 4).

Target 2

- Bring 80% of Sites of Scientific Interest (SSSIs) within Protected Landscapes into favourable condition by 2042.

Target 3

- 60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.

Target 4

- Continuing favourable management of all existing priority habitat already in favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042.

The international obligation that the government has signed up to of 30% of land and sea managed for nature by 2030 is a current major policy driver. National Landscapes (15% of England) include 31% of England's SSSIs, 22% of England's broadleaved woodland and 18% of England's deep peat. Blackdown Hills National Landscape should make a **significant contribution** to 30 by 30^{[4],[5]}.

Current status

We know that delivering nature recovery in England with the current resources is failing^[1].

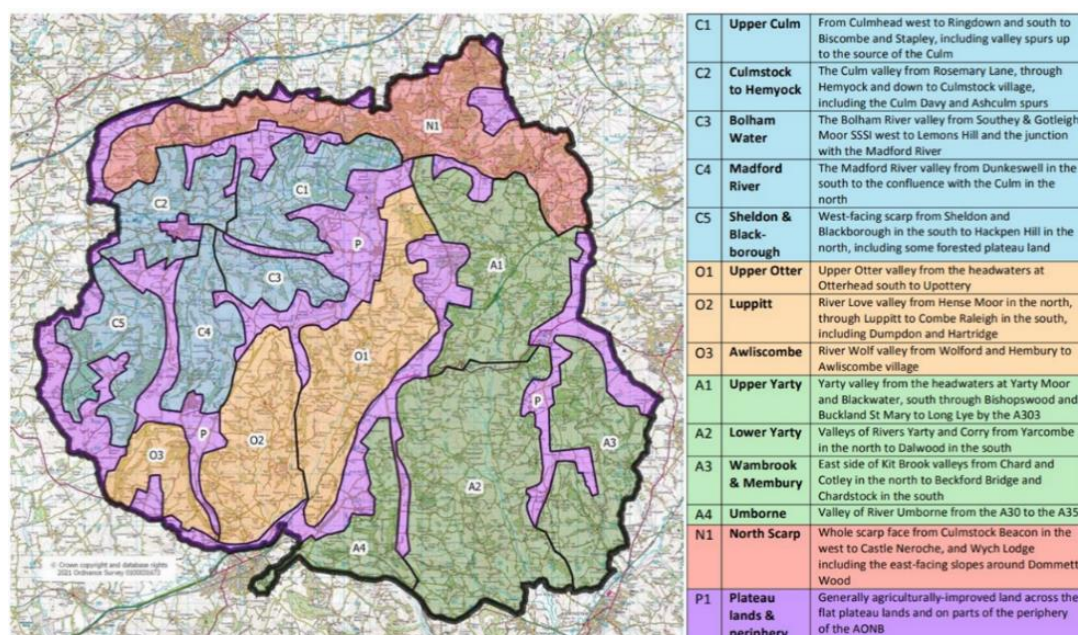
A focus on nature recovery

In 2021, the Blackdown Hills National Landscape Partnership held three workshops with a mix of landowners, conservation organisations, neighbouring National Landscapes, community interest groups and other stakeholders. The aim was to engage partners and inspire and inform positive action to conserve existing wildlife and habitats and reinstate what's been lost.

As a result of these workshops, a collective view was formed about what the priority measures for nature recovery (and delivery of other public goods & services) should be:

- Measures to slow the flow of flood water off the land, through nature-based solutions including tree planting, natural regeneration, leaky dams, additional water storage, hedgerow restoration, and improvement of soil infiltration.
- Measures to conserve soil, enhance soil quality, and prevent the loss of sediment and phosphates to watercourses, by reducing soil compaction, preventing soil erosion, and increasing soil organic carbon.
- Conservation of existing springline mire, wet and dry heath, species-rich grassland, and the prevention of loss of these habitats to scrub invasion, drainage, cultivation, inorganic fertiliser or herbicide application.
- Retention of long-standing permanent pasture, because of its high soil carbon content, undisturbed soil profiles, and botanical, fungal and invertebrate communities.
- Restoration or creation of new wildlife habitats such as ponds and wetlands, mires, species-rich grassland, hedgerows and broadleaved woodland.
- Measures to improve public understanding of farming and the environment in the Blackdown Hills, and community involvement in countryside management.

Following these workshops, a [Nature Recovery Delivery Plan](#) was produced. The 14 'Nature Recovery Areas' (NRAs) identified in this report deliberately cover the entire National Landscape. This all-encompassing approach has been taken to create a holistic agenda for nature recovery, recognising the importance of measures which can be taken across the farmed and forested landscape.



All 14 Nature Recovery Areas include land where priority actions can and should be pursued to enable the recovery of habitats, species and ecosystem functions across the Blackdown Hills National Landscape. 13 are based on river catchment and sub-catchment boundaries, excluding most of the flat plateau lands. These Nature Recovery Areas generally represent ancient countryside on the valley sides and floodplains, with thick hedges and relatively small field sizes.

The 14th Nature Recovery Area covers the remaining high plateau land, together with some of the lower peripheral land around the boundaries of the Blackdown Hills National Landscape. These areas are largely agriculturally improved, with larger, late-enclosure field patterns.

The nature recovery actions identified for these Nature Recovery Areas vary in their emphasis, from a focus on conserving and expanding existing habitat for biodiversity, to a consideration of opportunities for regenerative farming practices for soil conservation and hydrological management.

See also:

[Blackdown Hills State of Nature report](#)

[Blackdown Hills Nature Recovery Plan visualisations](#)

Headlines from the State of the Blackdown Hills National Landscape Report 2023

Number of SSSIs:

There are 16 designated Sites of Special Scientific Interest (SSSI) in the Blackdown Hills National Landscape, occupying 640 ha (1.73%) of its area.

Percentage of SSSIs in a favourable or unfavourable but recovering condition

94% of the Blackdown Hills' SSSIs are in a 'favourable' or 'unfavourable recovering' condition. This is an improvement from 2017. Then, only 90% of its SSSIs met the target. (However, this masks that only 19% are in 'favourable' condition.)

Area of priority habitats

There are 4,724.43 ha of priority habitats covering 12.8% of the Blackdown Hills National Landscape.

Area of woodland

There are 5,380 ha of woodland covering 14.5% of the Blackdown Hills National Landscape

Area of ancient woodland

There are 867 ha of ancient woodland covering 2.3% of the Blackdown Hills National Landscape

Percentage of woodland in active management

45%

Ecological status of rivers and lakes

0% in good or high status

Locally protected sites

Non-statutory designated sites cover around 8.5% of the Blackdown Hills National Landscape.

Otterhead Lakes Local Nature Reserve covers 0.1% of the Blackdown Hills National Landscape.

Priorities for action

- As guided by the Lawton hierarchy, **Target 4** is considered the top priority for action, followed by Target 2 & 3 and then Target 1. This is because it's vital to make the existing priority habitat 'better' before considering creating new habitat, although potentially both could be done concurrently, so long as resources are focussed on restoration and not creation.
 1. Target 1:
 - It is **vital** that this habitat creation is focussed on the highest priority areas, as per the Lawton hierarchy. See opportunity/ targeting map in 'evidence' section below.
 - The additional element of target 1 that relates to hedges- 'create or restore 30,000 miles of hedgerows **each** year by 2037.' The Blackdown Hills will have an important role to play here, having a well-connected and dense lattice of hedgerows across the landscape (one of its special qualities). Stat 11 (see annex) states the Blackdown Hills National Landscape as having a hedge length of 4,400 kilometres.
 2. Target 2 and 3:
 - Significant work needed in order to move sites from unfavourable recovering to favourable. This will require more condition surveying by Natural England and more incentives through ELM and other schemes, backed up by trusted local advisers.
 - The current status of SSSI condition in the Blackdown Hills National Landscape is that only 16.3% is in favourable condition. 94% is in a favourable or unfavourable recovering condition.
 - There is one Special Area of Conservation (SAC) in the Blackdown Hills National Landscape, currently failing to meet its conservation targets (marsh fritillary butterfly).
 3. Work with in a reciprocal way/ incorporate LNRSs (Somerset and Devon). Utilise this Management Plan to ensure appropriate and consistent delivery of the statutory duties arising from the Environment Act (2021) including Local Nature Recovery Strategies (LNRS).
- 30x30- the Blackdown Hills National Landscape is one of six national pilots developed by the Protected Landscape Partnership, in conjunction with the National Landscapes Association¹. The outputs from this work are summarised as:
 - The current 'potential' of the Blackdown Hills National Landscape to achieve 30x30 is 20% of the total area (i.e. restore **all** extant priority habitat)
 - Of this, the current 'actual' (meeting 30x30) is 10% of the total Blackdown Hills National Landscape area (3,700ha), with the majority of this in Somerset
 - Therefore, in order to reach 30x30, 10% more priority habitat needs to be re-created in the Blackdown Hills National Landscape i.e. c3,600ha

¹ Bruce Winney, National Landscapes Association, unpublished

4. Enhancing the data baseline, particularly for areas outside designated sites would be valuable. Refreshing / ground-truthing priority habitat maps in particular would help improve their accuracy and coverage
5. Integrated natural capital benefits from nature recovery include carbon budgets, catchment-scale improvements to fluvial management, well-being benefits from access and recreation, and cultural and heritage enhancements. The conservation of the characteristic complex 'patchwork' landscapes and point-features for the Blackdown Hills National Landscape within Nature Recovery Plans would be of value, particularly for spring-line mires
6. Following a process agreed nationally within the National Landscapes network, a suite of champion species of conservation concern has been identified and discussed with partners and national species champion organisations. We are also working collaboratively with other National Landscapes to take local, regional and national actions for species that are linked to the National Landscape's special qualities (such as springline mires) or that indicate the health of a well-connected landscape:
 - Greater and lesser horseshoe bat; Bechstein's bat
 - Hazel dormouse
 - White clawed crayfish
 - Brown hairstreak butterfly
 - Springline mire mosaic invertebrates including marsh fritillary, small pearl-bordered fritillary, double line moth, narrow bordered bee hawkmoth
 - Beaver
7. Local Nature Recovery Strategies will be identifying priority species where conservation measures are required over and above broad habitat management and restoration. It is anticipated that the champion species (listed above) will concur with the LNRs, but this needs to be an iterative process and so a review maybe needed part way through the Management Plan cycle, to ensure alignment.

Policies

N1 Use the Lawton principles^[3] of 'bigger, better, more and joined' to create networks that are fit for purpose for nature to thrive in and adapt to climate change.

N2 The mantra of 'right tree, right place' should be extended to 'right habitat/species, right place'. This should ensure that scarce and irreplaceable habitats are protected and that the development of one habitat does not damage the network of another.

N3 The long-term high-level Targets and Outcomes Framework^[6] targets will need to be embedded in plans and strategies to ensure that they have the highest statutory weight accorded by the strengthened duty in the Levelling Up and Regeneration Act 2023^[7].

N4 Priority species (including Section 41, Devon Special Species, Protected Species) will be conserved. Targeted action will be taken to support the recovery of champion/priority/indicator priority species.

N5 All public bodies within National Landscapes must have regard to Local Nature Recovery Strategy (LNRS). There should be alignment between the National Landscape and LNRS needs, and LNRS opportunities need to be reflected in partnership delivery on the ground.

N6 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.

N7 Increased recreational pressure will be resisted at locations where unacceptable damage or disturbance to vulnerable habitats or species is likely to arise.

Evidence

Some areas of the highest conservation value are nationally important Sites of Special Scientific Interest (SSSIs), covering 639ha of the Blackdown Hills National Landscape.

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 or 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.

In addition to the 16 SSSIs in the Blackdown Hills National Landscape, there is one Special Area of Conservation (SAC) of European importance for nature conservation.² This is located at Quants in the north of the Blackdown Hills, selected for its population of marsh fritillary butterflies, that occur on springline 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 Blackdown Hills National Landscape boundary to the south east is the River Axe SAC. The River Yarty, a major tributary of the Axe, rises and flows through the Blackdown Hills for most of its length. The Axe is designated as a

² <http://jncc.defra.gov.uk/page-23>

watercourse with a chalk influence with the 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.

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 give 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.

Wildlife habitats and species are part of a whole ecosystem, which includes our soils, water cycle, landform, rivers, and our human settlements. To pursue the health of any part of the nature of the Blackdown Hills, we need to understand how the whole ecosystem works, and where its functioning is being compromised. Outside of habitats like woodland, wetland and flower-rich grassland, good agricultural practices and a regenerative approach to soils, pasture and crops have huge implications for wildlife and healthy ecosystem function.

Smaller, more isolated patches of wildlife habitat are more vulnerable than larger, more connected networks. Populations of species like butterflies in isolated habitat patches cannot migrate to new patches. We will not retain our wildlife unless habitat becomes more extensive and connected. Connections could include more hedges, more rough vegetation around and between habitats, extended woodlands, and species-rich grassland or wetland to join up blocks of existing habitat.

Some of the habitats and species in the Blackdown Hills only occur in certain parts of the landscape – for example springline mire, around the springs between greensand and clay layers in the ground; and raft spiders, which only live on mires. Other habitats have a wider tolerance. To look after the diversity and specialness of Blackdown Hills' wild places, we need to ensure our most characteristic and unique features are retained. Also, some of our wildlife, like the dormouse, is relatively common on the Blackdown Hills but rare nationally, so we have a particular responsibility to sustain what we have.

While some aspects of modern farming and forestry, and the economic pressures which drive them, have had a negative impact on wildlife in the last fifty years, the very character of our habitats is a consequence of farming, forestry and nature working in harmony. Without farming, we would not have flower-rich pastures, meadows or heaths. We need to enable the positive effects of sustainable farming to continue to produce a wildlife-rich landscape, while diminishing the negative effects. Existing wildlife habitats, like wetlands, mires, hedges, copses and ponds, help us in many ways; they slow the flow and hold water back during floods, they retain moisture during droughts, they provide shelter for livestock, and they catch sediment before it reaches rivers. New wildlife habitat, if sited thoughtfully, can help us address the wider environmental pressures we face.

Sometimes, creating a new habitat can destroy a rarer existing habitat, for example by planting woodland on flower-rich pasture on a slope. Furthermore, new habitat will be most valuable for wildlife if it is sited close to existing good quality habitat of a similar kind. And unless the soil type and hydrology is right for a given habitat, it won't thrive. Where we can, we should let nature take the lead in determining what habitat develops where, rather than trying to be too directive. Often the ecologically richest places are in the 'edge zone' between habitats – we help nature to flourish where we allow it to relax and flow.

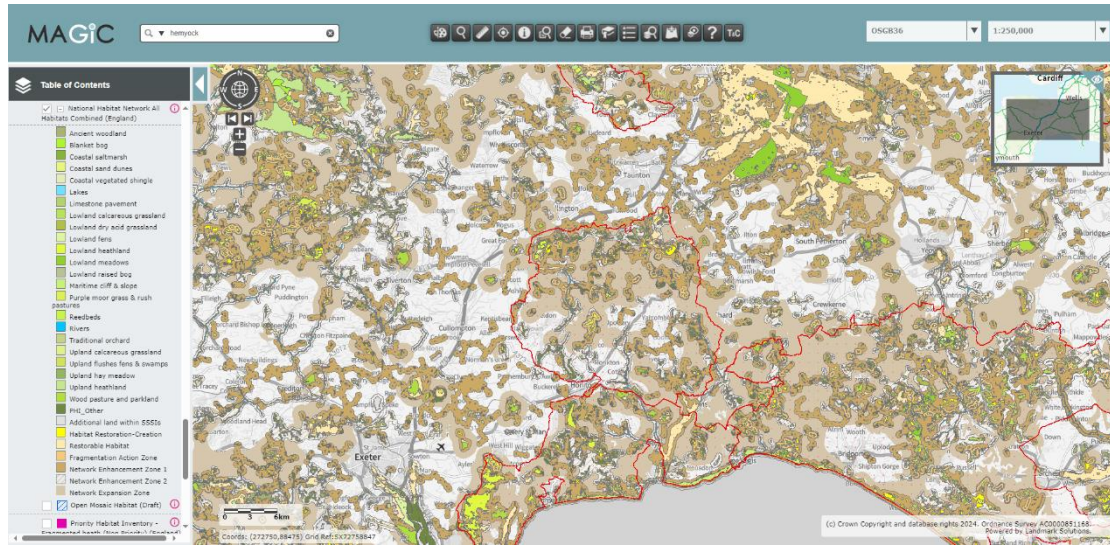
Wildlife in the Blackdown Hills, just like human society, is at risk from the effects of climate breakdown – flood, drought, high winds and high temperatures. Some habitats and species are more vulnerable than others, because of their location, exposure, or relationship to landscape features which are particularly impacted by severe weather events. We need to consider these differences in trying to build greater resilience into the landscape to enable nature to tolerate and adapt to a changing, unstable, extreme climate.

It is essential that we understand and nurture our soils, to allow wildlife to thrive and farming to continue to take a sustainable harvest from our land. And the interaction of water with soil is critical to future climate resilience, so we must manage the journey of water through our landscape more effectively – from infiltration of rain into soils, slowing flow down slopes, holding water in mires and wetlands, maintaining moisture in times of drought, and allowing rivers to function naturally in their floodplains.

Wherever they occur, wildlife habitats and species can and should benefit people. Nature is good for our mental and physical health and wellbeing, helps us work better together, provides enjoyment and tranquillity, provides settings and resources for business, and underpins everything that provides quality to our lives.

Wildlife habitats and the issues they face extend beyond the National Landscape boundary. The wildlife we protect and restore in the Blackdown Hills will contribute towards a national effort to restore a thriving, functioning natural environment across the UK. The UK has an international commitment to protect 30% of land for nature by 2030, and with organisations and land managers working together we can deliver a significant slice of that target.

Map showing National Habitat Network combined- note 'Network Enhancement Zone 1 and 2' that indicate the optimal locations for making the habitat network 'better, bigger', more and joined'.



Climate

- Our planet's climate is changing and warming at an accelerating rate. 2019 saw the UK's hottest ever recorded temperature and the warmest winter temperature. The increased levels of greenhouse gases (GHG) from human activities mean we are trapping more heat and causing our planet to warm at an unprecedented rate. The science is clear; we are in a climate emergency and need to act now to reduce carbon emissions to limit global temperature rise to below 1.5°C.
- 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 downpours 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.

Objectives

To safeguard the carbon stores in the Blackdown Hills National Landscape, reduce emissions from land and increase carbon sequestration, in ways which are compatible with nature.

Promote and deliver nature-based solutions to climate change.

To play an active role in addressing the climate emergency by delivering meaningful actions for climate change mitigation and adaptation, ensuring the actions are aligned with existing national, regional and local plans.

Guiding principles

Principle 1: The climate and nature crises are intrinsically linked.

Principle 2: We need to work urgently to mitigate climate change, including storing a much more carbon in our landscape, especially in soils and trees.

Principle 3: We need to ensure that climate change mitigation and the pathway to net zero is appropriate to the character of the Blackdown Hills, is consistent with the purposes of the National Landscape designation and protects the landscape's special qualities.

Principle 4: Fossil fuels must be phased out as an energy source, and energy consumption must be minimised wherever possible.

Principle 5: We need to take measures to help our communities adapt to climate change.

Principle 6: The climate change transition process must be democratic, fair and involve all communities, ensuring that no communities are unduly impacted.

Principle 7: We need to move beyond growth being the only measure of economic progress.

Targets

These are the [Protected Landscape Targets and Outcomes Framework](#) targets that we will contribute to:

Target 6:

Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050, relative to 1990 levels.

Target 7 (*to be apportioned*):

Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050. (There is no deep peat in the Blackdown Hills National Landscape (as defined by Defra) we will therefore not contribute to the national target. However it is important to note that 'soils with peaty pockets (scattered pockets)' covers an area of 10,017 hectares (27%) of the Blackdown Hills National Landscape (as shown in Defra's statistics – Stat 6)³.

Current status

Headlines from State of the National Landscape report 2023:	
Greenhouse gases	A 10% reduction in total greenhouse gas emissions across the local authority areas between 2017 and 2021.
Renewable energy	3 operating renewable energy generation sites.
Soil organic carbon stock	5% increase in carbon accumulating in the soils and vegetation between 2017 and 2021.

³ This is a non-spatial dataset that provides statistics on the area, depth and percentage cover of peatland within National Parks and National Landscapes.

Priorities for action

The top priorities for action are:

1. Nature-based solutions (carbon sequestration, sustainable agriculture, biodiversity).
2. A resilient local economy (local food, circular economy, renewable energy)
3. Education and communication.
4. Buildings retrofit & energy efficiency.
5. Sustainable transport.

Renewable energy is cross-cutting.

Further detail about research and preparation that is already underway to inform these actions is included in the Evidence section below.

Policies

Cross cutting

C1 To reach net-zero, support communities and individuals to collectively make changes to their behaviour, such as energy use, eating habits, travel choices, waste disposal and more, in addition to using technological solutions

C2 Ensure that relevant knowledge and skills are shared so everyone can switch to a net-zero lifestyle

C3 Plan settlements so that services can be accessed using active, shared and public transport, ensuring that the evolution of landscapes due to climate change is carefully managed in order to protect and enhance them

Energy supply

C4 Use less energy to reduce the amount of new energy infrastructure required to meet net zero

C5 Transition to renewables- energy used from renewable energy generated within the area need to rise to near 100% by 2050

C6 Develop carbon capture and storage and increase flexibility of supply

Food, Land and Sea: Nature based solutions

C7 Maximise carbon storage in the environment

C8 Reduce Greenhouse Gas (GHG) emissions through encouraging sustainable farming practices

C9 Support initiatives which protect the streams that meander down the valleys to feed the Yarty, Otter and Culm rivers (plus tributaries of the river Tone and Parrett)

C10 Develop demand for nutritious and sustainably produced food

Develop a resilient local economy & use of resources

C11 Avoid waste and create a circular economy through redesigning products to reduce their environmental impacts and improve their reusability and recyclability, buying second hand and recycling

C12 Reduce emissions from unavoidable biodegradable waste and wastewater treatment

C13 Use the purchasing power of Devon/ Somerset organisations to benefit the environment and local communities

C14 Support communities and businesses to transition to net-zero

Education and communication

C15 Engage in outreach & awareness raising activities which encourage & enable behavioural change in our communities

Built environment: Buildings retrofit and energy efficiency

C16 Improve energy efficiency for all buildings using low carbon technology in all refurbishment, regeneration and improvement schemes.

C17 Promote reduction of electricity consumption within the National Landscape

C18 Develop and encourage measures which reduce energy usage in existing buildings

C19 New Buildings need to be net zero as soon as possible

Sustainable transport

C20 Reduce the need to travel and support the development of sustainable transport and active travel options, while working to avoid leaving any community isolated

C21 Provide targeted advice, incentives and enforcement in respect of low carbon travel

C22 Encourage the development of a transport infrastructure that supports more low carbon travel options for people living in the National Landscape

Evidence

Climate change is in part driven by human land use, and in turn, a changing climate is exacerbating loss of biodiversity across the Blackdown Hills as elsewhere. However, actions that help reverse biodiversity loss will also contribute to increasing carbon sequestration and help make the landscape more resilient to climate instability. Nature-based solutions have an important role to play in tackling climate change, e.g. by reducing flood risk in the river catchments of the Blackdown Hills, while also improving conditions and habitats for wildlife. Meanwhile regenerative approaches to farmland management improve the resilience of soils and crops to climate extremes. Some habitats in the Blackdown Hills like mires, heaths and woodlands, already have high carbon stocks. Therefore carbon content should be borne in mind when prioritising habitat creation or restoration, and trade-off's between habitats need to take account of carbon implications. Restoring habitats like springline mire and wetland, and creating new woodlands in the right locations across the Blackdown Hills, will increase carbon sequestration as well as helping wildlife. And across the whole Blackdown farmed landscape, modest changes in land management practices could have a large cumulative effect on carbon storage.

There is a role for all those working in the Blackdown Hills to promote and implement lower carbon lifestyles, through organisations' own activities to minimise their carbon footprint, and by promoting local food, choosing venues accessible by public transport, online meetings etc. Moving away from the fossil fuel-based economy is essential for the whole of society, though it is harder in some respects to make that transition in a rural landscape like the Blackdown Hills. We need to do whatever we can to make it easier for businesses and residents here to reduce their dependency on fossil fuels, through renewables, reduced energy use, and more opportunities to share transport, for example. Our collective response to the climate crisis is unlikely to succeed if we expect to simply switch to renewable sources while maintaining current demand. We need to encourage a less profligate approach to energy use, seeking greater efficiency and reducing waste.

There is a massive societal shift required to respond to the climate crisis. That transition must be fair and equitable with the burden shared appropriately by all of us, according to our abilities and means. We must not allow the climate crisis to create new kinds of inequality. Given the need for all parts of our communities to be part of the change, and given that climate change – and the transition to avoid it – affects all of us, the decision-making to enable change must include everyone. We need to recognise as local communities and as a wider society, that our climate emergency is deepened by our continuing focus on economic growth as a measure of societal progress. A shift towards more progressive measures of a sustainable and circular economy, based less on resource depletion and more on regenerative principles, would make the fight against climate change more winnable.

Climate change adaptation

Warmer wetter winters; increased severity of storms; and hotter, drier summers are symptoms of a changing climate. These impacts are already being felt and will increasingly affect the special qualities and ecosystem services of our landscapes.

National Landscapes can play a vital role in adapting to climate change and building resilient landscapes for future generations. Climate adaptation reporting provides an opportunity to identify relevant climate risks, incorporate them into management processes, and encourage early engagement with stakeholders to address climate challenges.

Climate Change *Adaptation* Management Plans:

The government's 2023 Climate Adaptation Strategy under the Third National Adaptation Programme (NAP3) requires all National Parks Authorities (NPAs) and Areas of Outstanding Natural Beauty (AONBs) Partnership and Conservation Boards will have Climate Change Adaptation Management plans produced, embedded in or linked with their management plans by 2028, and in all future plans. See annex xxx for more information[to be added].

National Landscapes Climate *Adaptation* Risk Assessment:

A risk assessment document template has been created by National Landscapes, to provide a common approach for National Landscapes to conduct climate risk assessments. While this approach doesn't directly produce a climate adaptation plan, **it will identify the climate risks in each landscape and provide the information needed to create such a plan by 2028.**

This risk assessment processes seeks to provide a general format to identify risks to key assets and features of National Landscapes, identify policy responses and relevant local stakeholders, and finally set out planned actions for the short, medium and long term. Whilst also providing the flexibility for each individual landscape to carry out the process according to their own need.

To produce a climate adaptation plan, National Landscapes can utilise the risk assessment process following these principles:

- Identifies the key assets and features of the landscape;
- Assesses the vulnerability of these assets and features to the impacts of Climate Change;
- Consider sectoral impacts for principal land uses such as farming and forestry, as well as the natural, built and historic environment;
- Assess the impacts based upon current climate change projections;
- Score these risks and opportunities based on their likelihood, impact and risk over the short, medium and long term;

Headlines/ priority actions (against the three topic headings below) include:

Risks and Mitigation for Natural Environment

- Risks: Reduced and changed biodiversity – loss of trees, loss of pollinators, loss of water, flooding, loss of soil

- Mitigation:
- Resilient habitats help to mitigate extremes (as a result of climate change) and well-connected habitat allow species to move to new climate spaces (e.g. different aspects, slopes, feeding and breeding opportunities, shade/ sun) and avoid local extinctions.
- Impacts of browsing regenerating woodlands and trees may need to involve control of browsing animals such as deer
- Mainstream soil health & regenerative farming & forestry techniques, in order to build resilience of soils, that will in turn help with infiltration of water and storage of carbon

Risks and Mitigation for Farming and forestry:

- Risks: Necessary changes to farming practices. Reduced and changed biodiversity – loss of trees, loss of pollinators, loss of water, flooding, loss of soil, new pests and diseases, reduction in crop yield.
- Mitigation:
- Halo thinning and management of browsing around veteran trees will help make them more resilient.

Risks and Mitigation for Built Environment, Community & Economy

- Risks: Increased flooding and pressure on infrastructure, especially medical. Pressure on sewerage and loss of drinking water
- Mitigation:
- Nature based solutions that build resilience for communities and critical infrastructure, as well as provide a range of co-benefits including for biodiversity, carbon and water quality- e.g. by reducing flooding in the built environment, providing 'natural sponge' type functions to store and slowly release water in times of drought and 'natural filter' to help improve water quality
- Tree and shrub canopies provide shade and significant cooling benefits for communities and much more tree planting to field boundaries as well as single trees in fields gives protection to livestock and wildlife alike.
- Identify possible high-level mitigation actions
- Identify existing policy responses and identify any gaps;
- Identify relevant local stakeholders that can support or lead the action;
- Assess the acceptability of these options, their interdependencies, and potential barriers to delivery;
- Set out planned actions for the short, medium and long term.

See appendix xxx for the risk assessment outputs[to be added].

This links to the Devon, Cornwall & Isles of Scilly Adaptation Plan [Adaptation Strategy – Devon Climate Emergency](#). The risks identified in the BHNLC climate change adaptation plan 'nest' within the Devon, Cornwall & Isles of Scilly Adaptation Plan. In other words, the regional information has been tailored and refined down for

the BHNL, to highlight where actions (to build resilience and allow communities to adapt) can be most effective.

Climate change mitigation

- Climate change mitigation involves actions to reduce or prevent greenhouse gas emissions from human activities.
- Mitigation efforts include transitioning to renewable energy sources, enhancing energy efficiency, adopting regenerative agricultural practices and protecting and restoring forests and critical ecosystems that act as carbon sinks.

What is climate change mitigation?

Since the industrial era began, human activities have led to the release of dangerous levels of greenhouse gases, causing global warming and climate change. However, despite unequivocal research about the impact of our activities on the planet's climate and growing awareness of the severe danger climate change poses to our societies, greenhouse gas emissions keep rising. If we can slow down the rise in greenhouse gases, we can slow down the pace of climate change and avoid its worst consequences.

Reducing greenhouse gases can be achieved by:

- Shifting away from fossil fuels: Fossil fuels are the biggest source of greenhouse gases, so transitioning to modern renewable energy sources like solar, wind and geothermal power, and advancing sustainable modes of transportation, is crucial.
- Improving energy efficiency: Using less energy overall – in buildings, industries, public and private spaces, energy generation and transmission, and transportation – helps reduce emissions. This can be achieved by using thermal comfort standards, better insulation and energy efficient appliances, and by improving building design, energy transmission systems and vehicles.
- Changing agricultural practices: Certain farming methods release high amounts of methane and nitrous oxide, which are potent greenhouse gases. Regenerative agricultural practices – including enhancing soil health, reducing livestock-related emissions, direct seeding techniques and using cover crops – support mitigation, improve resilience and decrease the cost burden on farmers.
- The sustainable management and conservation of forests: [Forests act as carbon sinks](#), absorbing carbon dioxide and reducing the overall concentration of greenhouse gases in the atmosphere. Measures to reduce deforestation and forest degradation are key for climate mitigation and generate multiple additional benefits such as biodiversity conservation and improved water cycles.
- Restoring and conserving critical ecosystems: In addition to forests, ecosystems such as wetlands, peatlands, and grasslands, as well as coastal

biomes such as mangrove forests, also contribute significantly to carbon sequestration, while supporting biodiversity and enhancing climate resilience.

- Creating a supportive environment: Investments, policies and regulations that encourage emission reductions, such as incentives, carbon pricing and limits on emissions from key sectors are crucial to driving climate change mitigation.

Carrying out a carbon assessment of emissions from an individual landscape will create a carbon footprint for the landscape. This alone will not produce a pathway to Net Zero, but it will allow landscapes to understand the key areas of emissions in their landscapes and begin targeting areas for emissions reduction, whilst quantifying the amount of carbon sequestration required to meet Net Zero.

To produce a comprehensive pathway to net zero, National Landscapes relevant authorities, partnerships and communities/ organisations should follow these steps:

- Using the greenhouse gas emission data from government (and other data sources) to identify key areas of emissions, such as industry, commercial, public sector, domestic, transport, waste management, agriculture, and LULUCF (Land Use, Land-Use Change, and Forestry).
- Assess which areas National Landscapes can impact directly.
- Prioritise areas for immediate impact and plan how to engage stakeholders to reduce emissions or promote land use changes for carbon sequestration.
- Coordinate with existing plans and integrate climate action plans with nature recovery strategies to create a cohesive approach to climate action.
- Address emissions that are outside the jurisdiction of National Landscapes by engaging with local authorities, businesses, or other relevant stakeholders.
- Evaluate the feasibility and interdependencies of different actions and identify potential barriers to implementation.
- Develop planned actions for the short, medium, and long term to meet Net Zero targets.

This work will be drafted and then consulted on later in 2025 and completed in 2026. Outputs will be fed back into the Devon, Cornwall and Isles of Scilly Adaptation Plan.

Greenhouse Gas Emissions data

See annex for detailed data [to be added]

Headlines

Greenhouse gas emissions estimate totals have **dropped** for the following sectors between 2005 and 2022 (kt CO₂e):

- Industry: 5.2 to 3.0
- Commercial: 7.3 to 2.7
- Public sector: 0.9 to 0.3
- Domestic: 41 to 19.7
- Agriculture: 199.8 to 166.6
- Waste: 11.2 to 3.9
- Grand total: 276.4 down to 204.80

Greenhouse gas emissions estimate totals have **increased** for the following sectors between 2005 and 2022 (kt CO₂e):

- Transport: 57.3 to 58.3
- LULUCF: -46.3 to -49.5

Population (k people): 12.7 to 14.20

Per Capita Emissions (tCO₂e)- dropped from 21.70 to 14.40

Emissions per km² (kt CO₂e) dropped from 0.7 to 0.6

Carbon stores and stocks

In 2022, the National Association of AONBs (now the National Landscapes Association) commissioned Cranfield University to undertake a Carbon Audit and Metric (land management) assessment.

Zawadzka, J.E., Keay, C., Hannam, J., Burgess, P.J, Corstanje, R. (2022). National Landscapes Carbon Audit & Metric (land management), Bedfordshire: Cranfield University.

The overarching goal of the project was to provide a baseline assessment of organic carbon storage capacity of and fluxes from habitats present within all 34 National Landscapes in England, with emphasis on priority habitats.

The carbon audit focussed on carbon stocks and stores in soils and biomass of priority and non-priority habitats within the National Landscapes was based on two main data sources – the NATMAP Carbon dataset representing soil carbon stocks at the 1:250,000 mapping scale as well as available literature, summarised within the NERR094 report [Carbon Storage and Sequestration by Habitat 2021 - NERR094 \(naturalengland.org.uk\)](#) as well as a few additional sources.

It found that soil carbon *stocks*, expressed as tonnes of carbon per hectare, were generally *higher* in priority habitats than non-priority habitats, however, the absolute amounts of carbon *stored* within habitats, expressed as tonnes per habitat area, was higher in non-priority habitats, which can be explained by their large extent.

This assessment highlighted that both priority and non-priority habitats within the National Landscapes are valuable carbon stores with a good potential for carbon sequestration. Therefore, the main recommendation is to **preserve current high levels of carbon storage where they exist as well as increase the level of soil and biomass carbon on non-peaty soils, with a caveat that any land cover conversions should be preceded with thorough impact assessments on biodiversity and other ecosystem services, livelihoods, and net greenhouse gases emissions**

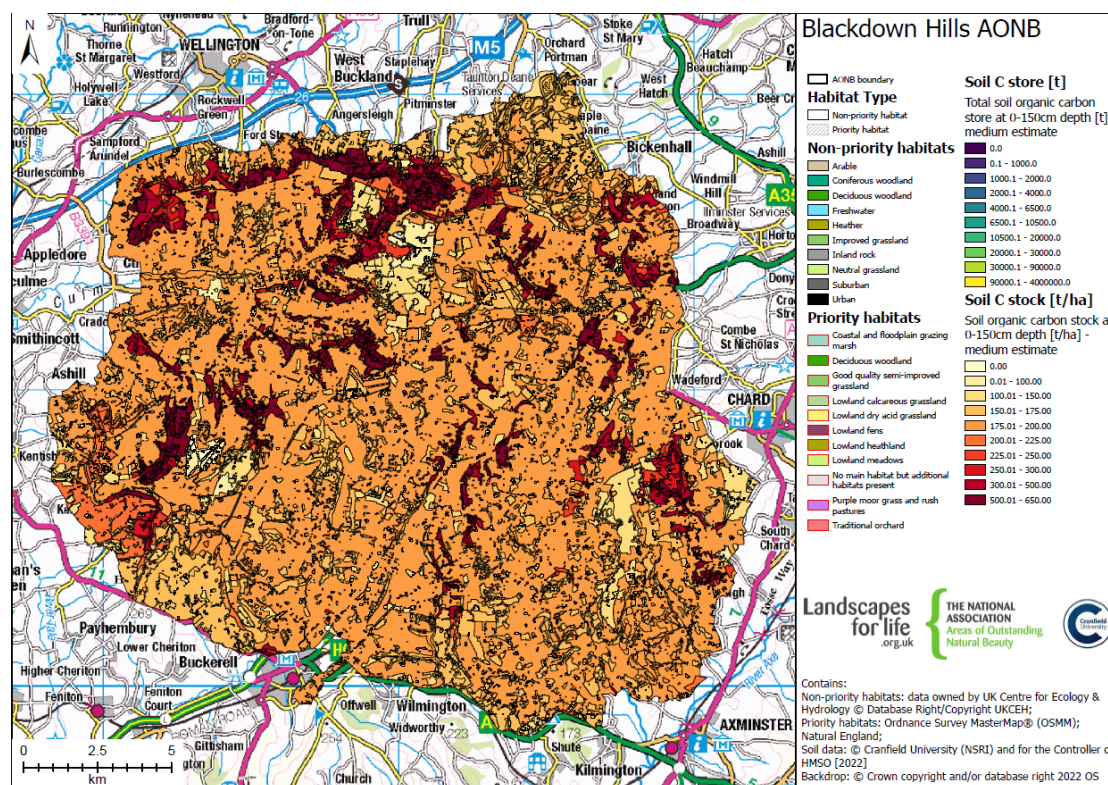
In this study there was had an opportunity to compare soil organic carbon contents represented by the NATMAP Carbon dataset to point observations sampled within three different National Landscapes: Blackdown Hills, Shropshire Hills and High Weald. The samples measured the organic carbon contents within portions of the

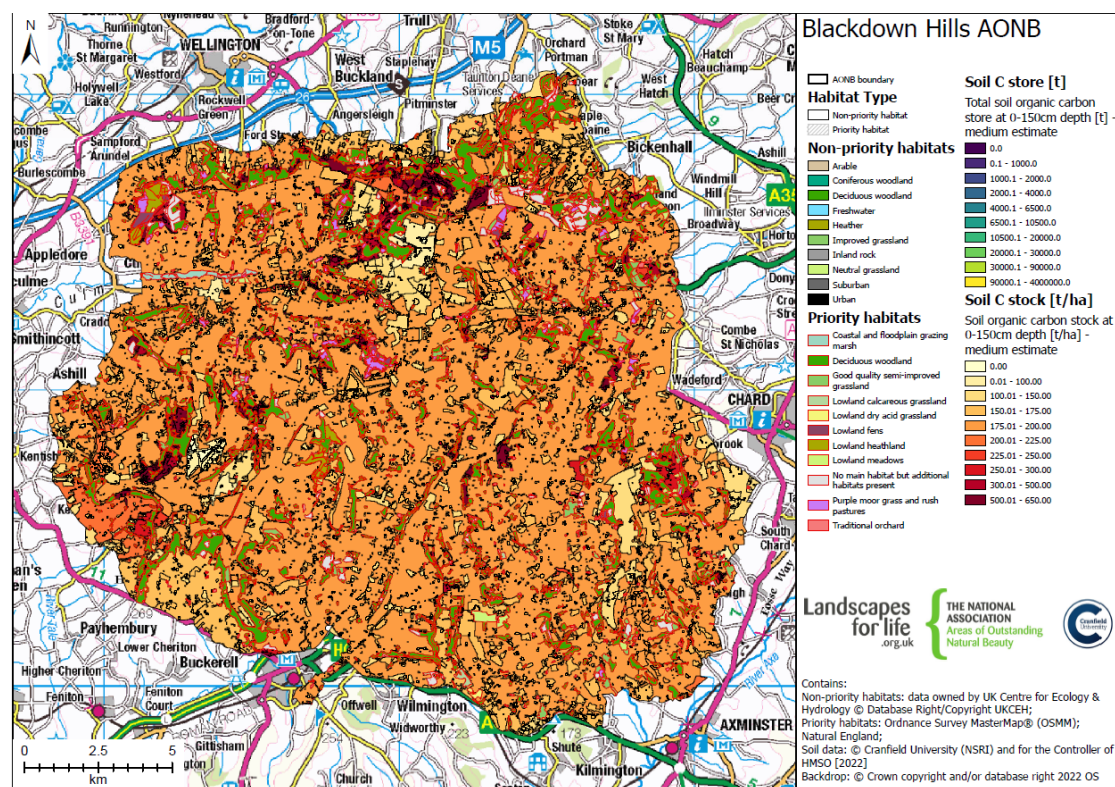
National Landscapes, and therefore it was possible to compare these values to organic carbon contents assigned to each NATMAP Carbon polygons rather than carbon stocks, which require information on soil bulk density and stoniness.

Outputs (for the Blackdown Hills):

1. Total soil carbon stored (0-150cm depth of soil, medium value) :
 - 7,740,695 tons/ carbon- based on NATMAP data
 - Of this, the amount stored in *non-priority* habitats is 6,257,900 tons/ carbon and the amount stored in *priority* habitats is 1,482,795 tons/ carbon
2. Based on literature, biomass carbon (stored above ground in vegetation) = 851,731 tons/ carbon (medium estimate for t/ C)
3. Based on literature, carbon flux = 571.10 **loss** of CO₂e [CO₂e gains (-)/losses (+) per habitat area]
4. Based on literature, an alternative carbon flux metric= 164.90 **loss** of carbon [C gains (-)/losses (+) per habitat area]

The maps below illustrate potential ‘win-win’ land management scenarios, where there are high densities of carbon stocks (dark brown colour on map 1) and also priority habitats (green/ pink colours on top of the dark brown colours).





Soil Organic Carbon in the Blackdown Hills AONB: Towards a Framework for Guiding Land Management Decision Making Report of a study undertaken in winter 2022-2023 in the Blackdown Hills Area of Outstanding Natural Beauty⁴

This was a follow-on piece of work, building on the Cranfield carbon audit & metric study.

Headlines:

- Different soil types vary greatly in their carbon stores, and their potential to hold more carbon.
- Soil carbon storage can be increased both through productive, in-field practices, and habitat creation or management.
- Managing productive soils to store more carbon also improves soil health.
- Managing wildlife habitats and creating new habitat also increases soil carbon storage.
- Each soil type can be managed to maximise its ability to store carbon, and the opportunities for doing so vary between soil types.
- **Vegetation with high nature conservation value generally has the highest level of soil organic carbon (SOC), with wet woodland, mire, and wet heath having the highest of all.**

⁴ Fred Constantine Smith with support from Gavin Saunders, Richard Smith and Tim Harrod, May 2023

- **The peaty and organic ‘Blackdown’ and ‘Hense’ soil types store the most carbon per hectare.**
- **Medium brown soils with a large area in the landscape, such as the ‘Whimble’ and ‘Batcombe’ soil types, can play a significant role in carbon sequestration via good soil management practices.**
- **A focus on soil carbon can offer a triple-win, for carbon sequestration, soil health, and biodiversity**

- **Humic soils (e.g. Hense) – found on the springline**
These naturally wet soils have high carbon levels when carrying semi-natural vegetation. Where they have been drained and agriculturally improved, rewetting them and restoring semi-natural vegetation could yield significant carbon gains

- **Brown Earths (e.g. the Batcombe) – found on the plateau**
These have a lower capacity for holding carbon (compared with wetter soils), but their extent means that the raising their soil carbon by just a small amount would have a significant impact on total carbon stocks in the landscape

Delivery and monitoring

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 for, 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 Countryside and Rights of Way Act Section 85 duty to further the purpose of conserving and enhancing the natural beauty of the Blackdown Hills National Landscape. 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 role of the Blackdown Hills National Landscape 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.

There are two main strands to this monitoring:

National Protected Landscapes Targets and Outcomes Framework

This defines the contribution that Protected Landscapes (as areas) should make to national targets and certain Environmental Improvement Plan outcomes. The Framework contains 10 targets. Each target is accompanied by an indicator which will measure progress towards it and its related outcome. Natural England will evaluate progress towards the targets and outcomes in the Framework.

Management reporting

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

The Blackdown Hills National Landscape Partnership will additionally look to develop a programme to identify appropriate, effective and proportionate mechanisms to measure or judge progress towards local priorities that may not be covered elsewhere or require local knowledge and research (could be related to diversity and

inclusion and engagement, or specific wildlife species, or hedgerows, for example), and will seek to work with wider partners to secure a long-term programme of monitoring along with appropriate resources.

Strategic Delivery Plan

This will be informed by consultation and will be added at a later stage. Focusing on outcomes and the strategic level, it will outline strategic high level actions and associated delivery mechanisms for the next 5 years, needed to deliver the ambitions of this plan.

Appendices of further and detailed information and data

(under development)

Appendix A: Special qualities

WHAT'S SPECIAL ABOUT THE BLACKDOWN HILLS: OUR SPECIAL QUALITIES

'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:

Landscape quality – a measure of the physical state or condition of the landscape

Scenic quality – the extent to which the landscape appeals to the senses (primarily, but not only, the visual senses)

Relative wildness – the degree to which relatively wild character can be perceived in the landscape makes a particular contribution to the sense of place

Relative tranquillity – the degree to which relative tranquillity can be perceived in the landscape

Natural heritage features – the influence of natural heritage on the perception of the natural beauty of the area. (Natural heritage includes flora, fauna, geological and physiographical features)

Cultural heritage – the influence of cultural heritage on the perception of the natural beauty of the area and the degree to which associations with particular people, artists, writers or events in history contribute to such perception

Special Qualities

The designated 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 area. 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 National Landscape.

Special Landscape Character

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.

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

It is an area notable for its **unspoilt rural character**, which remains relatively undisturbed by modern development and so ancient landscape features, special habitats, historical and archaeological remains have survived intact. In the winding lanes, the hidden valleys and traditional villages there is a sense of stepping back in time; of release from the stresses of everyday living; of the links between nature and humanity. The countryside remains largely unchanged and there is an identifiable and characteristic vernacular, pastoral landscape.

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

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. There are long views over field-patterned landscapes. Ancient, species-rich hedgerows delineate the fields and define the character of the landscape, enclosing narrow twisting lanes. The open plateau is dissected by steep valleys, the slopes supporting a patchwork of ancient woodland. The history of medieval and parliamentary enclosures has resulted in a contrasting landscape of small fields in the valleys and larger fields with straight hedges on the plateau. There are patches of heath and common, bog and mire and there are fine avenues of beech along the ridge. At a more detailed level there is a variety of visual and ecological interest; heathland birdlife, ground flora of woodland and mire, and colourful wildflowers on hedge banks.

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 such buildings and where the vernacular character is particularly well preserved. Predominant materials are chert and cob with thatch, over time often replaced by corrugated iron, or clay-tiled roofs. The appeal lies in the way in which the buildings fit so naturally into their surroundings.

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 Blackdown Hills. Large numbers of Mesolithic flint and chert tools have been found, as well as 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 spring-line 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 area. 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 wood-banks still survive.

Modern

Parliamentary Inclosure of heath and commons on the plateau tops in the 19th century has created distinctive landscapes of large regular fields with straight roads and beech hedges. The area contains some of the latest enclosures in Devon: Stockland Hill was not enclosed from heath until 1864, and Beacon Hill, Upottery, not until 1874.

The Wellington Monument, a prominent feature on the northern skyline, commemorates the battle of Waterloo. The National Landscape also contains important evidence from the second world war – the three airfields at Culmhead (Trickey Warren), Dunkeswell and Upottery (Smeatharpe). As well as the runways, a wide range of structures still survive at all three sites including pillboxes, aircraft dispersal pen and technical and domestic buildings. Some have been designated as Scheduled Monuments or Listed Buildings. There has been a substantial loss of

hedgerows and orchards to meet the needs of modern agricultural since the second world war; simplifying parts of the landscape and masking their early origins.

The 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 during the late 17th and the 18th century, providing informative descriptions and historical 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, colours and light of the Blackdown Hills continue to influence contemporary artists and makers.

The Blackdown Hills 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 National Landscape'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 area, 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 Upttery and on the Tracey Estate, Awliscombe have gone, but their parkland, formal garden features and ancillary buildings can still be seen.

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.

The National Landscape 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 in the north.

This immense variety, with patches of valuable habitat scattered throughout the landscape, is notable; these include flower-rich meadows, ancient hedgerows, spring-line 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.

Of particular note are the valuable plant communities that arise along the spring-lines, 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.

Summary of the special qualities and distinctive characteristics of the Blackdown Hills National Landscape

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

Reference can also be made to the [Blackdown Hills Landscape Character Assessment \[link\]](#) for further understanding of the contrast and diversity of the designated landscape and its management requirements.

<p>Natural Beauty component: Landscape quality</p> <p>A managed landscape sculpted and maintained by the stewardship of generations of those who work the land</p> <p>Undeveloped skyline of the northern scarp slope is a prominent feature in views from the Vale of Taunton and beyond</p> <p>Rich mosaic of diverse and interconnected semi-natural habitats; a patchwork of woodland, heathland, meadow and mire linked by hedgerows</p> <p>Clear, unpolluted streams that meander down the valleys to feed the Yarty, Otter, Culm rivers</p> <p>Ancient and veteran trees in hedgerows, fields and woodland</p> <p>A settled landscape with a strong sense of time-depth containing farmsteads and small scattered villages well related to the landscape</p>
<p>Natural Beauty component: Scenic quality</p> <p>The elevation and long, panoramic views out from the Blackdown Hills create a sense of detachment from surrounding towns and transport corridors</p> <p>Unspoilt, panoramic views across flat-topped plateau and straight undisturbed ridge tops and over hidden valleys</p> <p>A well-wooded pastoral landscape with a strong pattern of hedgebanks and hedgerow trees</p> <p>Pattern of regular, larger-scale enclosure fields on the plateau contrasts with the smaller, curving medieval fields on the valley slopes</p> <p>Majestic avenues of beech trees along northern ridges</p> <p>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</p> <p>Wellington Monument is a key landscape feature identifying the Blackdown Hills over a very wide area in all directions</p>
<p>Natural Beauty component: Relative wildness</p> <p>A sense of remoteness enhanced by the exposure of the plateau and more intimate extensive woodland of the upper slopes and hidden valleys</p> <p>Wide open spaces provide exposure to the elements; big sky, windswept places, contrasts of sunlight and shadow</p>
<p>Natural Beauty component: Relative tranquillity</p> <p>Areas of high tranquillity spared many of the intrusions of modern life, and places that offer a sense of detachment from surrounding towns and infrastructure</p> <p>Places to enjoy natural sounds; the melody of the song thrush and skylark, the call of buzzards</p> <p>Dark night-time star-filled skies contrasting with the light pollution of the surrounding towns</p>
<p>Natural Beauty component: Natural heritage features</p> <p>One of the finest, most extensive plateaus in Britain; a distinctive landform that contrasts with the surrounding lowlands to the east, north and west</p> <p>The underlying Upper Greensand geology is unique in Britain</p> <p>The presence of straight, uninterrupted ridges are evident as a visual backdrop over a wide area</p> <p>Distinctive spring-line mires located at uniform height around the upper slopes of the valleys</p>

<p>The varied landscape supports a rich assemblage of wildlife including many species of bats, butterflies and moths and meadow flowers and healthy populations of ferns, lichens, mosses and fungi</p> <p>Ancient, species-rich hedges with many hedgerow trees and flower-rich banks; colourful displays of primrose and bluebells in spring</p> <p>A network of ancient semi-natural woodland linked by hedgerows support a thriving dormouse population</p> <p>Streams and rivers are home to otters, beavers, lamprey and the vulnerable white-clawed crayfish</p>
<p>Natural Beauty component: Cultural heritage</p>
<p>The number and extent of well-preserved 17th Century and earlier buildings, and of complete traditional farmsteads in the local vernacular style – chert, cob and thatch – are an important element of the landscape</p> <p>Ancient hillforts are prominent features on the ends of the plateau ridges</p> <p>Mining remains from the once internationally significant whetstone industry and extensive evidence of iron-working</p> <p>Three World War Two airfields and remains of their associated buildings are found on the high, flat land of the plateau</p> <p>A community with a strong sense of place closely linked to the land and its management, with a particularly strong tradition of hedge laying</p> <p>A landscape that has inspired artists from the early 20th century Camden Town Group to the Blackdown Hills Artists and Makers of today</p>

Natural Capital Stock and Ecosystem Services in the Blackdown Hills National Landscape

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

Many of the elements which make up the natural beauty of the National Landscape 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. 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 Blackdown Hills 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 types of services:

Provisioning services: the products we gain and use from the National Landscape, such as food, energy and water

Regulating services: the natural functioning of the National Landscape purifies water, pollinates crops and maintains air quality

Cultural services: non-material benefits derived from interaction with the National Landscape, 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 are developing for some of these goods, but while they do not exist public investment should be made to adequately reward the conservation of natural assets.

Public goods from the National Landscape could 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 ecosystem goods and services provided by the Blackdown Hills National Landscape include:

- Farmers and foresters produce food, fibre, timber and wood fuel
- The 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, addressing flooding downstream, and support nutrient cycling
- Species-rich grasslands are biodiverse and support pollinating insects
- Historic features link, and add value, to the natural heritage stock and have cultural heritage value in their own right
- Recreational and access opportunities support the health and wellbeing of both residents and visitors
- The characteristic and richly patterned landscape and ancient features provide a strong sense of place and history
- The distinctive landform and coherent landscape are inspirational at a personal, cultural and spiritual level
- The area gives access to clean air, tranquillity and freedom from noise and light pollution

Appendix B: Planning

General Principles for Development Proposals

All applicants of development proposals in the Blackdown Hills National Landscape 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 National Landscape and what actions you are taking both to conserve and to enhance the landscape, scenic beauty and other factors of natural beauty;

Think Enhancement - positively set out to 'enhance' the natural beauty of the National Landscape 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 National Landscape. 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 National Landscape;

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 National Landscape 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 National Landscape 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 National Landscape. 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).

Major Development

Note that all paragraph and footnote references relate to the December 2023 version of the [National Planning Policy Framework \(NPPF\)](#)

Footnote 64 of the NPPF clarifies that:

'For the purposes of paragraph 183 [relating to protected landscapes], 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 National Landscape. 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 National Landscape 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 area. As outlined elsewhere, 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 National Landscape those aspects of natural beauty which make the area distinctive and which are particularly valuable – the 'special qualities' - are described in detail elsewhere in the appendices.

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 National Landscape's 'special qualities'. As well as potential impacts within the Blackdown Hills, consideration should also be given to impacts on these criteria within the setting of the National Landscape, particularly in the context of visual impact (i.e. views into and out) and impacts on tranquillity.

As outlined in paragraph 183 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 National Landscape Partnership would expect any such development proposal to 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 Blackdown Hills. 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 on 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 National Landscape 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 National Landscape, and clearly identify and justify 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. An important principle to address is even if there are deemed to be exceptional circumstances generally, such as the need for housing in a particular local authority area, this does not necessarily equate to exceptional circumstances for a particular development at a specific location because there may be alternative sites that could result in less harm to the National Landscape. 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 National Landscape 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 National Landscape 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 National Landscape taken 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 National Landscape,
- be compatible with the objectives and policies of the 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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Report for: Cabinet

Date of Meeting:	15 October 2024
Subject:	REVIEW OF MID DEVON HOUSING ASBESTOS MANAGEMENT PLAN
Cabinet Member:	Cllr Simon Clist Cabinet Member for Housing, Assets and Property and Deputy Leader
Responsible Officer:	Simon Newcombe – Head of Housing and Health
Exempt:	None which are Exempt from publication under paragraph 3, Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) as it contains information relating to the financial or business affairs of any particular person (including the authority holding that information)
Wards Affected:	All
Enclosures:	Annex A – Asbestos Management Plan

Section 1 – Summary and Recommendation(s)

Mid Devon Housing (MDH) has a legal requirement to maintain health and safety and have an up to date Asbestos Management Plan. Recent changes to statutory consumer regulation standards produced the Regulator of Social Housing (RSH) impose reporting and other changes which require the plan to updated.

Recommendation:

That the updated MDH Asbestos Management Plan be adopted as recommended by Homes PDG.

Section 2 – Report

1 Introduction

1.1 Mid Devon Housing (MDH) has a legal duty to manage the Asbestos Containing Materials (ACMs) within its housing stock. This duty is placed on it by the

Control of Asbestos Regulations 2012 as well as the Health and Safety at Work etc Act 1974, The Construction Design and Management Regulations 2015 (CDM) and The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

- 1.2 Furthermore, the statutory RSH Safety and Quality Standard published under the requirements of the Social Housing (Regulation) Act 2023 sets out an overarching duty where providing safe and well-maintained homes is a fundamental responsibility of all registered providers. This legislation also introduced a suite of new, mandatory Tenant Satisfaction Measures (TSMs) with 12 performance data metrics including:
 - BS03: Asbestos Safety Checks
- 1.3 Under the BS03 TSM, there is a new statutory definition and a prescribed calculation method for asbestos surveys/inspections and further requirements as set out in the TSM Technical Requirements document as published by the RSH in April 2023 (updated April 2024) – see background papers for a link to this document.
- 1.4 Section 10 of the Social Housing (Regulation) Act 2023 also requires registered providers of social housing such as MDH to appoint an executive level employee to hold an overarching duty regarding the safety of their properties and tenants.
- 1.5 This person must be notified to both the Regulator of Social Housing and our tenants by June 2024 (completed). The duty is specific to MDH properties only (i.e. does not cover general fund buildings and assets) and covers all health and safety risks, for example – fire, gas, electrical, asbestos and legionella safety alongside all other category one hazards defined under the government’s Housing Health and Safety Rating System. This person will further appoint technically competent, responsible persons to ensure appropriate assessments and appropriate practice is put in place day to day.
- 1.6 This requirement came into force on 1 April 2024 and whilst the general provision is reflected in current Asbestos Management Plan, the duty holder should be set out clearly within the Plan once appointed internally. This appointment has now been confirmed and forms part of the key accountabilities of the Head of Housing and Health.
- 1.7 These changes requirement to update the Asbestos Management Plan to ensure there full alignment across our asbestos reporting and appointed persons accountabilities. This alignment is addressed in the updated Asbestos Management Plan attached in Annex A.
- 1.8 Under housing legislation including the Social Housing (Regulation) Act 2023, the RSH take co-regulatory approach. In the context of a local authority registered provider such as MDH this means:

- councillors are regarded as responsible for ensuring that providers' businesses are managed effectively and that providers comply with all regulatory requirements
- providers must support tenants to shape and scrutinise service delivery and to hold officers and councillors to account

This is important context in the determination and adoption of new or updated policy or plans and monitoring of compliance and performance.

2 Consultation and Review

- 2.1 As an internal, building safety management plan setting out how legal requirements on the management of asbestos will be met there is no requirement for tenant consultation. Nonetheless, having an up to date Asbestos Management Plan provides assurance to tenants and members (through co-regulation) that we are meeting our legal duties and ensuring the health, safety and wellbeing of tenants in our properties.
- 2.2 The Plan will be kept under continuous review against legislative requirements and statutory best practice to ensure it remains fit for purpose. The Head of Housing and Health also holds delegated authority to make minor amendments to the Plan as required by legislative changes, formal guidance or local operational considerations.
- 2.3 Where material or significant amendments are required the plan will receive a full review and will be brought back to the Homes PDG and Cabinet for consideration.

3 Recommendation

- 3.1 In accordance with the above, the following recommendation is made:
- That the PDG recommends to Cabinet that the updated MDH Asbestos Management Plan be adopted

Financial Implications

The Housing Revenue Account (HRA) budget for the works contained within the plan is up to £170,000.00 per annum. These works will result in enhanced Health and Safety by providing a higher level of understanding relating to where ASMs are and a lower cost in the coming years as measures are taken to remove the ACMs in the most cost effective way.

Legal Implications

As a registered provider (RP) of social housing, the Council is obliged to take account of the standards contained within the revised regulatory framework which is administered by the Regulator of Social Housing (RSH) as well as The Health and Safety at Work Act 1974, The Control of Asbestos Regulations 2012, The Construction Design and Management Regulations 2015 (CDM), The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). This places a duty on

MDH to manage the ACMs within its housing stock and the duty when working with asbestos.

There are further overarching legal responsibilities under the new consumer regulation regime regulated by the RSH as set out in the main body of the report.

Risk Assessment

The principal risk is failing to limit costs due to additional works and delivery of the programme within the plan. The performance of the plan will be monitored monthly and corrective action will be taken where performance falls below Key Performance Indicator

Impact on Climate Change

The environmental impact has been considered as a part of the developing the plan.

Equalities Impact Assessment

All staff have received Equality and Diversity awareness training.

Relationship to Corporate Plan

To contribute towards meeting our obligations relating to Health and Safety and by contributing to the Decent Homes Standard.

Homes are a priority for the Council and in the context this Plan this includes supporting the delivery of several key objectives including ensuring our tenants feel safe, secure and happy in our homes.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett

Agreed by or on behalf of the Section 151

Date: 29 August 2024

Statutory Officer: Maria de Leburne

Agreed on behalf of the Monitoring Officer

Date: 29 August 2024

Chief Officer: Simon Newcombe

Agreed by or on behalf of the Chief Executive/Corporate Director

Date: 21 August 2024

Performance and risk: Steve Carr

Agreed on behalf of the Corporate Performance & Improvement Manager

Date: 22 August 2024

Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Mike Lowman, Operations Lead for Building Services or Simon Newcombe, Head of Housing and Health

Email: mlowman@middevon.gov.uk / snewcombe@middevon.gov.uk

Telephone: 01884 255255

Background papers:

[TSM Technical Requirements \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

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Mid Devon Housing

Building Services

Asbestos Management Plan – DRAFT

August 2024

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1.0 General Policy Statement for Asbestos

- 1.1 Mid Devon Housing (MDH) has a legal duty to manage the Asbestos Containing Materials (ACMs) within its housing stock. This duty is placed on it by the Control of Asbestos Regulations 2012 as well as the Health and Safety at Work Act 1974, The Construction Design and Management Regulations 2015 (CDM), The Reporting of Injuries, Diseased and Dangerous Occurrences Regulations (RIDDOR) and the Social Housing (Regulation) Act 2023
- 1.2 There are two duties
 - The duty to manage asbestos in non-domestic premises
 - The duty when working with asbestos
- 1.3 In accordance with section 10 of the Social Housing (Regulation) Act 2023, as a Registered Provider of social housing, MDH must also designate an individual to monitor the provider's compliance with all health and safety requirements and assess risks of failure to comply with these. This relates to the wellbeing of our tenants, which will include ensuring that there are effective Asbestos management arrangements in place. This designated person is referred to as the Health and Safety Lead and for MDH is the Head of Housing and Health.
- 1.4 Furthermore, as a Registered Provider, MDH must meet the requirements of the statutory Consumer Standards set by the Regulator of Social Housing. This includes the Safety and Quality Standard, which requires landlords to provide safe and good quality homes for their tenants. MDH has an overarching Homes Safety Policy which demonstrates how we will meet these wider, related requirements. A copy of the policy is available on the MDH website at <https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/procedures-policies-and-strategies>
- 1.5 This management plan details the approach MDH takes when working with asbestos in its housing stock. Also MDH will do everything reasonably practicable to manage the risk and prevent harm to all persons caused by the release of asbestos fibres from the ACMs contained within its properties.
- 1.6 This management plan is not prepared in relation to the duty to manage asbestos in non-domestic properties as set out in Regulation 4 of the 2012 Regulations.
- 1.7 The duty to manage the asbestos in common parts of multi-occupancy domestic premises, like purpose built flats also falls on MDH. This is dealt with as a generic approach within Appendix 6
- 1.8 MDH's long-term aim is to safely manage the ACMs within the properties it is responsible for, while also managing its available budgets.

2.0 Introduction:

- 2.1 This Management Plan details the approach that MDH is taking for the day to day management of ACMs within its stock and is based on the template that is available from the Health and Safety Executive's website.
www.hse.gov.uk/asbestos/duty/asbestos-management-plan.htm
- 2.2 This Management Plan is to be read in conjunction with Mid Devon District Council's Asbestos Policy

3.0 Responsibilities

3.1 The Head of Housing and Health (The Duty holder) will:

- a) Will ensure that there are sufficient resources available for the implementation of this plan.
- b) Will delegate responsibility for the implementation of this plan to the Managers
- c) Will review the provisions and resources required for the efficient operation of this plan every year.
- d) Act immediately if the requirements of this plan are not met or if there is a fundamental change in any circumstances or assessment associated with this plan.

3.2 The Operations Lead for Mid Devon Housing (The Appointed Person) will:

- a) Ensure that there are sufficient resources available for the implementation of this plan.
- b) Ensure that the requirements of this plan are implemented
- c) Ensure that risk assessments and safe systems of work are in place
- d) Ensure that employees are competent and receive the necessary training, information and supervision whilst performing any tasks in regards to this plan.
- e) Maintain the training matrix for employees
- f) Communicate this plan to all employees and raise awareness of the risks associated with asbestos to employees, contractors and tenants.

3.3 The Planned Maintenance Manager (Deputy Appointed Person) will:

- a) Be suitably trained
- b) Ensure that the requirements of this plan are implemented
- c) Ensure that the Asset Database is updated
- d) Store the digital asbestos surveys and update reports on a shared folder
- e) Establish contracts for surveys, and management works with licensed and unlicensed asbestos removal contractors
- f) Carry out competency checks of surveying and works contractors
- g) Review and update the asbestos register

- h) Be responsible for monitoring the ongoing condition of the Asbestos Containing Materials via a specialist officer.
- i) Review the Asbestos Management Plan annually and develop the Action Plan
- j) Provide details of the asbestos register and site plans to the emergency services when requested.
- k) Implement resilience testing for planned and unplanned work and accidental disturbance of an ACM

3.4 The Maintenance Supervisor (Cyclical) Building Maintenance will:

- a) Maintain the asbestos database and register, and produce programmes relating to the annual inspections and works where appropriate
- b) Maintain the shared folder for the digital asbestos register and update reports. R:\ASBESTOS INFORMATION
- c) Review and update the asbestos register
- d) Provide details of the asbestos register and site plans to the emergency services when requested.
- e) Communicate the location of the asbestos register on a regular basis

3.5 Surveyors/Supervisors/Technical Support and Repairs Manager will:

- a) Ensure that a risk assessment and safe systems of work are in place for the asbestos management works within their responsibility.
- b) Arrange surveys for the works they manage and ensure that this information is entered onto the asset database.
- c) Check that contractors and employees they manage have the skill, knowledge, experience and training required for the work.
- d) Provide employees and Contractors with a copy of the asbestos register and/or the asbestos survey report of the properties affected by the works.
- e) Issue permits to work and provide inductions
- f) Where they have direct line management responsibility, provide a risk assessment detailing suitable control equipment and procedures
- g) Provide details on what must be done if an ACM is unexpectedly disturbed. Appendix 2
- h) Store any statement of cleanliness/reoccupation certificate and waste consignment note for the work they are managing on the shared folder with the file R:\ASBESTOS INFORMATION
- i) Arrange for adequate training for employees

3.6 Employees will:

- a) Comply with this asbestos management plan and notify their Supervisor / Manager of any issue concerning them relating to asbestos and ACMs.
- b) Undertake any asbestos awareness and task specific training relating to their work.
- c) Ensure that they have a copy of the survey information, a risk assessment and method statement for the work they are undertaking.

- d) Ensure they have the correct personal protective equipment, other suitable equipment and have been trained to carry out the work.
- e) Refuse to carry out any work relating to the management of asbestos where the above has not been provided
- f) An appointed Specialist Officer will re-inspect the asbestos and record the condition within the asset database

3.7 Licensed and Unlicensed Asbestos Contractors/Surveyors will be required to:

- a) Comply with current legislation and associated Approved Codes of Practice and guidance.
- b) Provide their employees with the appropriate training, health screening for the works, PPE, risk assessments and method statements as well as inductions and copies of the survey report.
- c) Carry out surveys following the HSG 264 The Survey Guide [Asbestos: The survey guide HSG264 \(hse.gov.uk\)](https://www.hse.gov.uk/asbestos/surveyguide.htm)
- d) Attend site to assess and prepare a Plan of Work and submit this to the HSE
- e) Attend site to assess and prepare a Risk Assessment and Method Statement and provide MDH with a copy
- f) Notify the HSE of any Notifiable Non Licensed Work (NNLW)
- g) Provide a safe method of work for emergencies that will be discussed and agreed with the Principle Designer or Contract Administrator managing the works
- h) Provide specialist asbestos advice
- i) Arrange transport and disposal of asbestos waste materials in accordance with current regulation and good practice.
- j) Arrange Four Stage Air Clearance and Certificate of reoccupation or a Statement of Cleanliness.
- k) Provide copies of Notifications, Certifications, Waste Consignment Notes and other relevant documentation on request to the Principle Designer or Contract Administrator

3.8 All other Contractors will

- a) Restrict access from areas where asbestos is present.
- b) Provide their employees with the appropriate asbestos training to ensure they understand any information they are provided with and what they are being asked to do.
- c) Provide their employees with information from the asbestos register or survey of the property they are working on.
- d) Provide their employees with inductions, including provision of the risk assessment and method statement.
- e) Implement a safe system of work
- f) Provide a permit to work, if required.
- g) Provide adequate PPE, management and supervision.

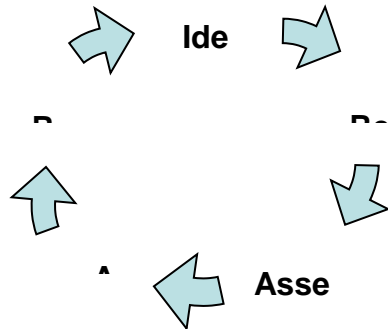
3.9 The Health and Safety Advisor will:

- a) Investigate and report incidents under RIDDOR
- b) Provide advice on Asbestos Awareness and Task Training for staff as necessary.
- c) Provide advice on good practice, relevant legislation and assess compliance.

4.0 Managing Asbestos within Mid Devon Housing's Stock

4.0.1 No new or recycled ACMs can be used.

4.0.2 As part of the legal obligation to manage the ACMs within the housing stock, MDH have to carry out the following processes:



4.1 Identify

- 4.1.1** MDH are legally obliged to identify the ACMs within the housing stock prior to managing them and before allowing any works to start that may disturb the asbestos fibres for both Major and Minor Works.
- a) Major Work includes planned/cyclical/voids which require technical input and pre-assessment. This will include preparation of drawings, sketch details, specifications, notes, schedules or contract documents
 - b) Minor Work are defined as those that would normally be actioned by the issuing of a works order or instruction and would include emergency, reactive, routine, day-to-day or other small jobs.
- 4.1.2** ACMs are identified by carrying out a survey and taking samples following The Survey Guide HSG 264, available from the Health and Safety Executive (HSE) [Asbestos: The survey guide \(hse.gov.uk\)](https://www.hse.gov.uk/asbestos/surveyguide/). There are two types of survey, a Management Survey used to identify ACM's with only a minor amount of intrusive work and a Refurbishment and Demolition Survey, used where major works including demolition are planned. MDH have a contract with a competent asbestos surveying contractor for this role.
- 4.1.3** MDH currently has management surveys, which includes samples, of over 75% of its housing stock and is working towards a target of 100% by 2026. Where there are gaps in our information we arrange for a survey to be carried out or rely on cloned information.
- 4.1.4** Refurbishment and Demolition Surveys are carried out where more intrusive works or demolitions are planned
- 4.1.5** Re-inspections of known ACMs are carried out at a rate of 20% per annum, unless there is a recommendation within the survey report that this should be done sooner.

4.2 Record

- 4.2.1** When an asbestos material is identified via a survey and a UKAS accredited laboratory analysis; the results are recorded within the Asset Database, which is a live document and provides the information for the Asbestos Register that MDH are legally obliged to hold and maintain.
- 4.2.2** The Asbestos Register contains information including the type of asbestos, its condition and location, which is continually updated from the surveys, re-inspections and removal reports as they are received. A copy is held on the shared drive R:\ASBESTOS INFORMATION\ASBESTOS REGISTER

- 4.2.3** The Asbestos Register into which ACM locations are entered is maintained by the Maintenance Supervisor (Cyclical) Building Maintenance.
- 4.2.4** MDH is legally obliged to provide a copy of the Asbestos Register to all employees and contractors prior to them starting work on a property. Operatives are provided with this information via their tablets.
- 4.2.5** Tenants and Leaseholders have been provided with details of where asbestos is contained within their homes as well as guidance on how to deal with asbestos in an information letter sent during 2020 and as part of their tenancy sign up pack. This information is also to be provided upon request.
- 4.3 Assess and Plan**
- 4.3.1** The asbestos register is to be reviewed annually to identify an Action Plan of measures, works and recommendations relating to the management of the ACMs.
- 4.3.2** The following priorities will be used to drive the programmes of work within an Asbestos Action Plan.
- a) Any ACMs with a Material Assessment score greater than 10 require immediate action.
 - b) Any ACM in good condition, but with a high potential for disturbance either during normal occupancy or foreseeable maintenance should be protected or removed
 - c) ACM's likely to be disturbed by any major planned refurbishment works must be removed unless work can be designed to avoid the ACMs
 - d) Some ACMs may require more frequent condition checks to inform long term management actions
 - e) Some locations may be subject to activity changes and will require a review of the actions and priorities
 - f) When surveys or condition checks identify further information, this and any altered priorities as well as the impact is to be included in the action plan.
- 4.3.3** The Action Plan of measures are aimed at reducing the higher level assessment scores
- 4.3.4** Where an existing ACM has been identified and it is in good condition, not releasing fibres and not subject to abrasion, damage or imminent works, it should be left undisturbed.
- 4.3.5** The decision to remove an ACM that is in good condition is only made under the following conditions:

- a) When the property is empty and it is safer to carry out the works rather than when the property is occupied.
- b) When there are major works planned that would significantly disturb the ACM.
- c) When there is an anticipated spike in the removal costs in the future and there is an opportunity to considerably reduce that anticipated spike by bringing the works forward.

4.3.6 Before the ACM has any management works carried out to it. The works need to be assessed to determine if the work can be carried out by a **Licensed or Unlicensed Contractor**. To help with this there is a **Decision Flow Chart** contained within Appendix 1. This flow chart is to be treated as a guide; if there is any doubt a manager is to be consulted regarding the decision.

4.3.7 When it has been recommended that the works should be carried out by an Unlicensed Contractor, but there is a higher risk of fibre release due to the condition of the material, it may need to be treated as Notifiable Non Licensed Works (NNLW).

4.4 Act.

4.4.1 This may include, but is not limited to, full or partial removal, encapsulation or monitoring. All of these are known as measures.

4.4.2 When a decision has been made to carry out work to an ACM a decision then has to be made as to whether a licensed or unlicensed contractor can carry out that work.

4.4.3 All employees and contractors must have appropriate **awareness and/or task** training at a sufficient level before being allowed to work on any of MDHs stock; including to any ACM that is not being removed or encapsulated. Some tasks, like cleaning vinyl floor tiles, can be done by workers who have had asbestos awareness training.

4.4.4 Anyone doing unlicensed works must be suitably trained for the task and follow the HSE's guidance www.hse.gov.uk/asbestos/essentials. The guidance is the HSE's task manual for building, maintenance and allied trades on non-licensed asbestos work (Asbestos Essentials). MDH have a contract in place with a suitable qualified unlicensed asbestos contractor.

4.4.5 Some tasks, for example the removal of multiple damaged AIB ceiling tiles, must be done by a licensed contractor.

4.4.6 A licensed contractor is qualified to work with ACM's that pose the highest risk to health by the type of asbestos and potential for fibres to be released from that material. The list of these contractors can be found on

the HSE's website [Current Licensed Asbestos Contractors | CONIAC](#)
MDH have a contract in place with a suitable qualified licensed asbestos contractor.

- 4.4.7** Before any Licensed or Unlicensed works are carried out the contractor must supply a risk assessment and method statement. For Notifiable Non-Licensed Work the contractor must submit a notification to the HSE before starting the work. In the case of the licensed work the contractor must supply the HSE with a notification of work two weeks in advance. This is also known as the Plan of Work or ASB5, and the contractor will provide a copy of this to MDH upon request.
- 4.4.8** Where a suspected ACM is discovered that is not on the Asbestos Register, work that may disturb it is to stop and it is to be reported to a manager within Building Services to allow a sample survey to be carried out and the appropriate action taken to manage the material.
- 4.4.9** If an ACM has been accidentally disturbed then work in that area is to cease. The Contract Administrator must be notified and the Contingency Plan within Appendix 2 needs to be implemented.
- 4.4.10** All asbestos waste must be disposed of in an approved licensed tip. Only an approved registered waste carrier is permitted to dispose of waste from site to point of final disposal. The contractor must provide a method statement as to the complete packaging and removal of the waste to the point of final disposal and provide copies of the Waste Transfer/Consignment Notes to the Contract Administrator.
- 4.4.11** Upon completion of the unlicensed works the contractor is to supply a copy of the Statement of Cleanliness and Waste Consignment Note
- 4.4.12** Upon completion of the licensed works, the contractor is to supply a waste consignment note and a satisfactory copy of the four stage air clearance certificate that is also the certificate of reoccupation. Where a partial enclosure has been used a limited four stage air clearance certificate will still be required.

4.5 Review

The Planned Maintenance Manager and the **Maintenance Supervisor (Cyclical) Building Maintenance** are to review the Asset Database and Asbestos Register throughout the year to identify works and also to identify more effective ways of managing the asbestos that is contained within the housing stock.

5.0 Training

- 5.1** Employees such as surveyors, supervisors, contract managers, health & safety staff, trade operatives and caretakers will receive one full day

training on general asbestos legislation and awareness training, which is to be recorded on the learning hub.

5.2 Asbestos awareness refresher training will be held to meet legislative requirements or when the legislation changes or following a reportable incident.

5.3 All contractors' operatives working on MDH properties will also have had to receive appropriate Asbestos Awareness Training within the last year and all MDH operatives who will work with ACMs will undertake non-licensed task specific training on working with asbestos.

6.0 Fly Tipped waste

6.1 When a report has been received that a suspected ACM has been illegally tipped in an area that is the responsibility of MDH. The Planned Maintenance Manager is to be notified and is to arrange for it to be removed via the Contract with the Licensed or Unlicensed Asbestos Contractor. If the Planned Maintenance Manager is not available, the Operations Lead Mid Devon Housing is to be contacted

6.2 Prior to its removal the Repairs Service are to cordon off the area to prevent unauthorised access.

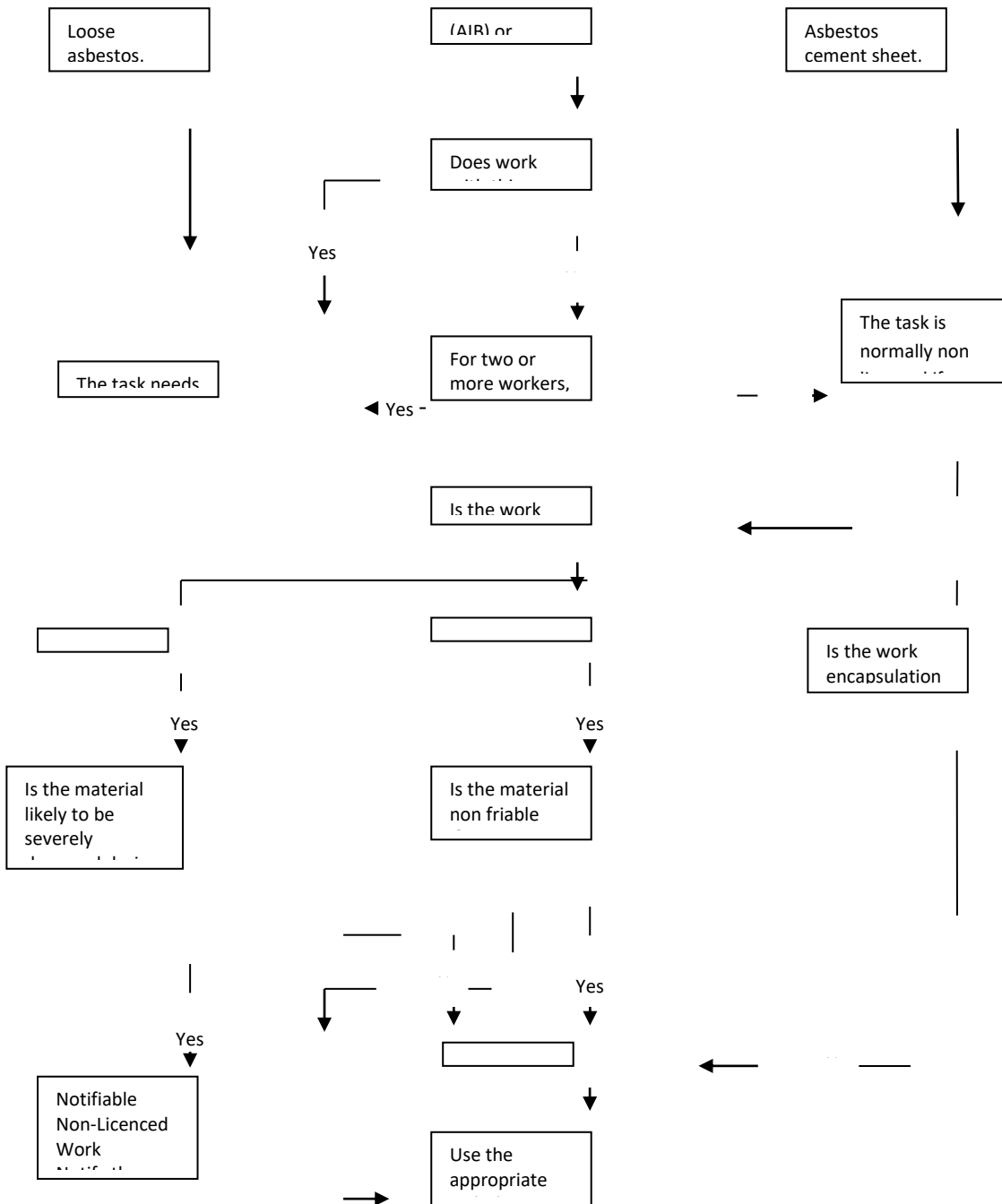
6.3 The Planned Maintenance Manager is to contact the Housing Management Service to inform them of the anticipated actions and to allow them to contact nearby residents and let them know of the actions being taken.

6.4 Upon completion of the removal and disposal works the Contractor is to supply the Waste Consignment Note and Certificate of Reoccupation.

6.5 When a report is received out of hours, the out of hours team are to contact the standby officer, who will coordinate the appropriate action.

Appendix 1 - Decision flow chart

Use this simple flow chart as a guide to help you decide who needs to do the work.



Appendix 2 – Contingency Plan – Procedures to be followed in the event of unexpected exposure to suspected asbestos fibres

- 2.1 Immediately stop all work in the area
- 2.2 Evacuate and seal off the immediate area, for example by closing doors etc. If this involves tenants or members of the public, it may need to be done with the assistance of housing management.
- 2.3 Prevent anyone else from entering the area
- 2.4 The incident should be reported immediately to a supervisor
- 2.5 The Supervisor will check the Asbestos Register. If the material is confirmed or suspected to be asbestos then.
- 2.6 There should be an immediate site visit by an appropriately qualified Surveyor from Wakeham Asbestos Services Ltd to decide on the measures required.
- 2.7 Notify the Health and Safety Advisor and the Corporate Manager for Public Health Regulation and Housing and seek their advice.
- 2.8 Notify the Health and Safety Executive of the incident with copies of correspondence to Supervisor in charge of works. The HSE's concerns team are also to be notified. Update the accident book and consider reporting the incident as part of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- 2.9 After carrying out any necessary measures to make the area safe, ensure the contractor issues a statement of cleanliness or certificate of reoccupation before allowing access
- 2.10 Counselling/health surveillance for anyone affected to be considered;
- 2.11 Notify the Estates Manager in case of publicity and insurance claim by parties involved.
- 2.12 A debrief should be held after the matter has been fully dealt with to review the incident, determine what measures, if any, that could be taken to prevent a recurrence. To be chaired by the Health and Safety Officer with input from the surveyor involved and Housing Management as required.
- 2.13 Operations Lead for Mid Devon Housing to draw up and circulate an appropriate advisory notice and make recommendations for inclusion in the Asbestos Management Plan at the next review.
- 2.14 Asbestos register to be updated

Mid Devon District Council

Corporate

Asbestos Management

August 2022

Version Control

Title: Asbestos Management Policy

Purpose: Compliance with health and safety legislation

Owner: M Lowman

Date: January 2022

Version Number: 3.0

Status: Final

Review Frequency: at least every 3 years

*Next review date: **February 2025***

Consultation:

This document has obtained the necessary approvals:

Purpose

Mid Devon District Council aims to be a responsible employer which accepts its responsibilities and duties to provide a safe working environment for all employees, in accordance with the provisions of the Health & Safety at Work Act 1974, the Workplace (Health, Safety and Welfare) Regulations 1992 and measures to ensure the management and control of existing asbestos is carried out in accordance with the Control of Asbestos at Work Regulations 2012.

Asbestos Policy

1. Introduction

This policy document refers to the Council's arrangements for managing the risks of exposure to asbestos by employees and non-employees within its activities.

Staff involved with maintenance of buildings, supervising such work, or issuing contracts should fully familiarise themselves with the contents of this document.

Asbestos was widely used as a building material for many years, particularly between the period 1950–1980 and can be found in a wide variety of forms, being used in all aspects of the construction process. The use of asbestos products for construction materials is severely restricted today, due to the long-term legacy of illness associated with exposure to the product.

There are many forms of asbestos, the main types being:

- white asbestos (chrysotile);
- brown asbestos (amosite);
- blue asbestos (crocidolite).

All types of asbestos are considered dangerous and stringent control limits are set for personal exposure (0.1 fibres per cubic centimetre averaged over a continuous period of 4 hours).

There are a number of problems associated with exposure to asbestos namely:

- asbestos fibres are not detectable to the naked eye;
- the health effects of exposure can be fatal;
- the onset of symptoms is often delayed for decades after exposure;
- there is widespread public concern over exposure;
- asbestos was widely used in the construction industry and will be found in many pre-1980 buildings (although not exclusively);
- it is not possible to determine that a material contains asbestos by visual examination;
- by law - exposure has to be rigorously controlled and monitored.

It is not possible to identify asbestos by its colour as the age of the product and its combination with other products can alter the appearance.

Approximately 5,000 people die each year from asbestos-related diseases and this number is increasing year on year. Many of these deaths are from working in high risk industries many years ago with the emphasis now being on the maintenance trade. There are now much more stringent controls over the management of asbestos in the workplace to ensure that its presence is identified and an appropriate management plan put into place to prevent exposure.

The legislation relating to the control of asbestos in the workplace is extensive and is supported by Approved Codes of Practice and HSE Guidance Notes. This chapter provides a general overview of how to manage asbestos in the workplace **but does not provide guidance as to the safe treatment or removal of asbestos due to the specialist nature of the work and its applicability to a minority of employers, who by the very nature of their business have to be fully aware of the legislative requirements. These employers must be licensed by the Health and Safety Executive to work with asbestos. Mid Devon District Council is not licensed and must therefore employ external properly licensed contractors where required by law (see section 7).**

Asbestos only causes problems when fibres are released into the atmosphere, such as when it is being worked on, disturbed by nearby maintenance work, or where the material is friable and may suffer abrasion or there are strong air currents. If the asbestos is in a good condition and protected against damage, the danger will be negligible unless the material is being worked on. It should be noted that potentially more problems can be caused by removing sound and protected asbestos than by leaving it in place so, if depending on risk assessment the risk is considered to be low, it is best left undisturbed.

The supply and use of asbestos and asbestos-containing products is prohibited (except for a limited number of specified uses). Asbestos-containing products in use before 1 January 1986 (blue and brown asbestos), 1 January 1993 (other forms of asbestos except white asbestos) and 24 November 1999 (white asbestos) were permitted to be used, but their replacement must be of an asbestos-free material. Once an asbestos material has been removed arrangements must be made for its safe disposal.

2. Responsibilities

Mid Devon District Council's policy on asbestos must ensure that known and identified locations of asbestos are recorded and that this information is given to those persons who require it to protect not only themselves but others around them. The 'Duty to Manage' requirement under Regulation 4 of the Control of Asbestos Regulations 2012 will apply.

The Chief Executive is ultimately held responsible for compliance with health and safety law. Below the Chief Executive level, Managers are identified as being responsible, so far as is reasonably practicable, for managing the health, safety and welfare at work of all employees in their respective areas, and for non-employees where their health or safety may be affected by the Council's activities. In particular Managers will:

- Maintain an Asbestos Register identifying the locations and types of asbestos that are within the Council's control.
- Make a point of checking the relevant Asbestos Register at the point where works are planned.

- Prepare and revise as necessary the arrangements for managing work involving asbestos material in their service area.
- Ensure works involving licensed asbestos are carried out by a licensed competent contractor and that the work is notified to the HSE using the FODABB5 notification form (see www.hse.gov.uk).
- Ensure that adequate resources are made available to enable the arrangements to be implemented. Arrangements include management surveys, analysis and where necessary advice and removal by a specialist licensed contractor.
- Ensure appropriate asbestos awareness training, information and instruction is provided for relevant employees.
- Ensure that where specialist technical expertise in relation to asbestos is not available within the Service, suitable arrangements are made to obtain this information as required. This can be obtained from the Environmental Services Manager or the Corporate Health and Safety Advisor as the first point of contact.
- Ensure that employees or relevant contractors are provided with all the appropriate information, instruction and training on work being undertaken in areas containing anything suspected of containing asbestos.

The Corporate Manager for Public Health, Regulation & Housing is responsible for maintaining an Asbestos Register of all MDDC corporate buildings and domestic council owned tenanted property and shall be responsible for ensuring that all designated responsible premises officers are aware of the locations, condition and control measures recommended to prevent risks to health and safety.

Asbestos Registers must be continuously reviewed and updated as changes occur.

3. Health Effects of Asbestos

There are three main types of serious health risks associated with exposure to asbestos fibres:

Asbestosis – chronic obstructive lung disease

Lung cancer – a fatal lung disease

Mesothelioma – a fatal cancer of the outer lining of the lung specific to asbestos exposure.

It is recognised that the largest group of workers at risk from asbestos exposure are workers involved in the repair and maintenance, refurbishment and demolition of buildings, including electricians, plumbers, joiners, computer and telecommunication

engineers – people who may encounter asbestos during their normal day to day work activities.

5. Legislation

The legislation relating to the management of asbestos in the workplace can primarily be found in:

- Health and Safety at Work etc Act 1974 (general duties on employers and management of premises);
The general provisions of the 1974 Act are applicable to the management of asbestos in the workplace, particularly s 2 (duty towards employees), s 3 (duty to non-employees) and s 4 (duty of person having control of premises).
- Management of Health and Safety at Work Regulations 1999;
The Management Regulations require employers to undertake risk assessments of the risks to health and safety arising out of, or in connection with, their business.
Duties are also placed in respect of co-operation and co-ordination where persons are sharing a workplace.
- Workplace (Health, Safety and Welfare) Regulations 1992;
These Regulations place requirements on employers to maintain their buildings so as not to cause a risk to health and safety.
- Construction (Design and Management) Regulations 2015;
These Regulations require clients to provide pre-construction information to persons carrying out construction work. Such information would include the results of any asbestos surveys undertaken in the premises. There is also a requirement to ensure that the ‘health and safety file’ is prepared and maintained for future reference.
- Defective Premises Act 1972;
The Act places a duty on landlords to ensure that tenants and other persons are safe (so far as is reasonable) from personal injury or disease that results from the defective state of the premises.
- Control of Asbestos Regulations 2012.
The Regulations set out the duties relating to exposure to asbestos and its correct management. The Regulations include:
 - management in non-domestic premises (reg 4);
 - identification of the presence of asbestos (reg 5);
 - assessment of work that exposes employees to asbestos (reg 6);
 - plans of work (reg 7);
 - licensing of work with asbestos (reg 8);
 - notification of work with asbestos (reg 9);

- information, instruction and training (reg 10);
- prevention or reduction of exposure to asbestos (reg 11);
- use of control measures (reg 12);
- maintenance of control measures (reg 13);
- provision and cleaning of protective clothing (reg 14);
- arrangements to deal with accidents, incidents and emergencies (reg 15);
- duty to prevent or reduce the spread of asbestos (reg 16);
- cleanliness of premises and plant (reg 17);
- designated area (reg 18);
- air monitoring (reg 19);
- standards for air testing and site clearance certification (reg 20);
- standards for analysis (reg 21);
- health records and medical surveillance (reg 22);
- washing and changing facilities (reg 23);
- storage, distribution and labelling of raw asbestos and asbestos waste (reg 24);
- labelling of products containing asbestos (reg 30);

7. Asbestos Licensing

The 2012 regulations prohibit anyone from carrying out work with high risk asbestos e.g. insulation, asbestos coating or asbestos insulating board unless they hold a licence granted by the HSE (Health & Safety Executive).

To be exempt from needing a licence the work must be:

- Sporadic and low intensity - to be considered sporadic and low intensity the concentration of asbestos in the air should not exceed 0.6f/cm³ measured over 10 minutes; and
- Carried out in such a way that the exposure of workers to asbestos will not exceed the legal control limit of 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm³); and
- Meet at least one of four other conditions:
 - It is a short non-continuous maintenance task, with only non-friable materials (friability describes how likely an ACM is to release asbestos fibres when worked on, so non-friable materials will only release a small number of fibres during work); or
 - It is a removal task, where the ACMs are in reasonable condition and are not being deliberately broken up, and the asbestos fibres are firmly

contained within a matrix, e.g. the asbestos is coated, covered or contained within another material, such as cement, paint or plastic; or

- It is a task where the ACMs are in good condition and are being sealed or encapsulated to ensure they are not easily damaged in the future; or
- It is an air monitoring and control task to check fibre concentrations in the air, or it's the collection and analysis of asbestos samples to confirm the presence of asbestos in a material.

8. Notification of Non-licensed asbestos work (NNLW)

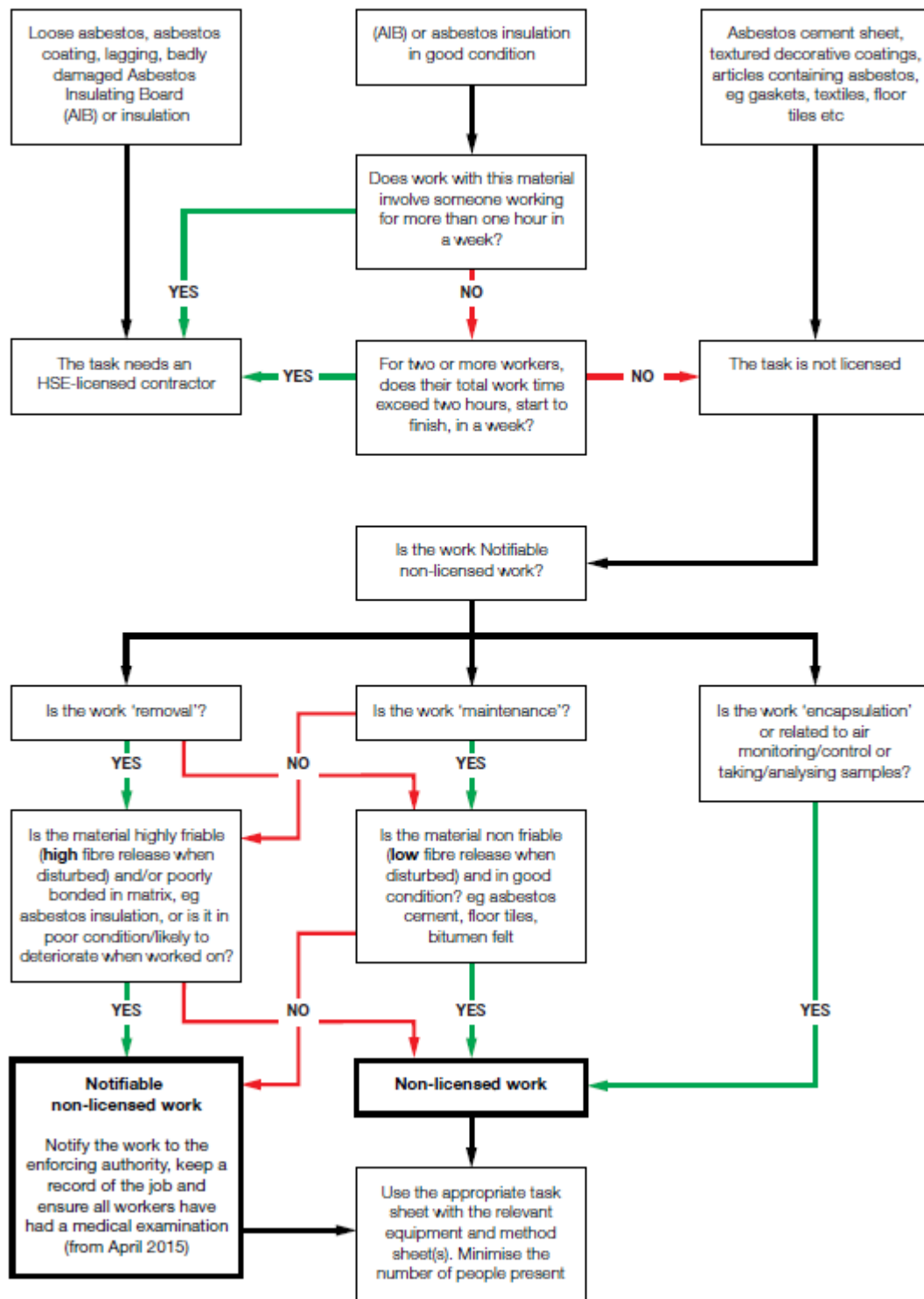
The Control of Asbestos Regulations 2012 introduced the following requirements:

- Notification of certain types of relatively low-risk work on ACM that does not require the use of a licensed contractor. This notification is on-line here <https://extranet.hse.gov.uk/lfserver/external/asbnnlw1>
- Medical examination of those persons carrying out the work
- Maintaining registers of work (health records)

Whether a type of asbestos work is either licensable, NNLW or non-licensed work has to be determined in each case and will depend on the type of work that is going to be carried out, the type of material being worked on, and its condition. The identification of the type of asbestos-containing material (ACM) to be worked on and an assessment of its condition are important parts of the risk assessment that must be carried out before the work commences. The HSE asbestos essentials guidance (AE) includes the following to assist:

Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



9. Policy Application

The following arrangements consist of a series of procedures which are intended to safeguard persons who may encounter the possibility of discovering asbestos in the

course of their work and to ensure the safety of any premises occupants who may be affected by any associated works which may involve the disturbance of asbestos containing materials.

All reasonable practicable steps will be taken to ensure that MDDC employees, tenants and contractors working on behalf of the MDDC will not be exposed to hazards associated with materials containing materials.

10. Asbestos Surveys

The Health and Safety Executive (HSE) publication HSG264 Asbestos: The Survey Guide sets out how to survey workplace premises for asbestos containing materials and how to record the results in a usable form. A decision needs to be taken at an early stage as to whether to carry out a management or refurbishment/demolition survey – or a mixture of the two.

Management Survey:

Seen as a standard survey (previously known as Type 1, 2 or 3 asbestos surveys) – these are concerned with the risk management of asbestos in normal occupation and will be less expensive, intrusive and disruptive than the alternative. The emphasis is on identifying asbestos containing material (ACM) as far as is reasonably practicable and assessing the potential for fibre release during normal occupancy of the building and the activities carried out there – including during routine maintenance and repair e.g. redecoration.

Refurbishment and Demolition Survey:

Where major refurbishment or demolition is planned, this is an intrusive examination of the building including sampling to identify and control the risks of asbestos release. Refurbishment can include projects where plant is removed from a building.

A systematic programme of surveying all MDDC owned domestic and Corporate properties has been undertaken overseen by Housing and Property Services and as these are reviewed they will be brought into line with the current guidance HSG264.

12. Asbestos Register

Data collected on site will be input by the Housing and Property Services onto the Asbestos Register.

The information will include:

- Property information;
- Inspection method;
- Surveyor's detail;
- Site plans;
- Material detail;
- Sample analysis results;
- Material assessment;

- Priority assessment;
- Risk rating;
- Management recommendations

13. Material Assessment

The condition of each asbestos element identified on site is assessed using the material assessment algorithm as defined in the HSE publication HSG264.

The assessment will depend on four different parameters:

- Asbestos type
- Product type
- Extent of damage
- Surface treatment

15. Assessment Score

The total score of material assessment and priority assessment gives the risk rating which is high, medium, low, or very low.

This is used to determine the management actions necessary for ensuring safety.

- High - urgent action required
- Medium - remedial works required
- Low/very low - manage/maintain

All the information collected during the asbestos surveys will be recorded in the Asbestos Register.

The Asbestos Register of Council owned housing will be maintained in the Housing Services (repairs and maintenance) offices at Old Road depot, Tiverton.

The register for all Corporate buildings will be maintained by the Facilities and Corporate Buildings Manager and held at Phoenix House.

A hard copy of the register will be issued to the responsible officer of each property on the register.

Access to the Register will also be made available to property managers, Building Maintenance staff and contractors working on the property.

The public utility services, the fire brigade and others whose presence may expose them to possible risk from asbestos will have access to the council asbestos register as appropriate.

18. Information for Contractors

All officers with the responsibility for issuing works orders will ensure that prior to the works commencing the asbestos register is consulted and the existence of asbestos is brought to the attention of the contractors in writing, clearly identifying areas which are known/presumed to have asbestos containing materials. In addition a **“Permit to Work”** will be issued to all contractors prior to commencement of both licensed and non-licensed work activities.

Where contractors arrive on site, they must be under instruction to report their presence and identify the tasks that they are to carry out to the responsible property officer. At this point the Asbestos Register located at the Old Road or Phoenix House must be accessed and the premises must be checked to confirm either way the information previously issued by the ordering officer.

Should the contractors discover any variances to the information contained in the asbestos register, this must be reported to the Manager responsible for Asbestos management to enable him to update the Register.

19. Asbestos Licensed Contractors

A system of vetting and appointing suitable applicants for inclusion on the Council’s standing list of asbestos contractors is operated. Contractors carrying out work on behalf of the Council are subject to performance monitoring and recording.

Only contractors who have been vetted and approved by MDDC Housing and Property Services shall be eligible to tender for asbestos work. All Contractors shall be reviewed by the Housing and Property Services Manager every five years.

Housing and Property Services shall ensure that prior to any asbestos removal works being undertaken, the appointed contractors provide all relevant documentation required for works with asbestos.

This shall include:

- ASB5 notification form and plan of work
- Copy of their Asbestos Licence
- Company insurance document
- Company Health and Safety policy
- CDM Health and Safety plan as notified to the HSE
- Training records
- Medical Certificates
- RPE face fit test certificates
- Plant examination and test certificates
- Permit to work
- COSHH data
- Waste disposal arrangements

Documentation required on completion of the removal works shall include:

- Site diary

- Site induction records
- Daily enclosure and air lock inspection records
- Daily negative pressure units and vacuum inspection records
- Respirator inspection records
- Daily decontamination unit inspection records
- Operative showering records
- Working platform inspections
- Air monitoring and clearance certificates
- Personal air monitoring records
- Asbestos exposure records
- Waste consignment notes

20. Disposal of Asbestos Waste

The contractor used for the disposal of asbestos must be licensed for this by the Environment Agency.

All asbestos containing material shall be disposed of by double wrapping in labelled 1000 gauge polythene sheeting or bags, and transported by a licensed carrier to a landfill site correctly licensed to receive asbestos waste.

The disposal of asbestos material shall be the responsibility of the appointed contractor. As such, evidence of appropriate documentation for the consignment and disposal of asbestos waste shall be required prior to payment.

21. Disposal of Fly-Tipped waste containing Asbestos

The Council (Environmental Services) will be responsible for the arranging for the removal of fly-tipped waste, which is suspected of containing asbestos. Where large amounts of fly-tipped waste (which is suspected of containing asbestos) are reported, the Environment Agency should be consulted on the collection and disposal methods to be used. A contractor appropriately licensed for the collection of this waste will be used and the costs of this re-claimed from the offender where possible.

22. Training

All staff who may encounter asbestos during the course of their work shall be given the necessary training to be able to identify the situations in which asbestos may be present, to be able to recognise asbestos or similar suspect materials and to set out safe working practice to minimise risks to health and safety.

Persons in charge of buildings will be provided with appropriate training and information regarding accessing information from the Asbestos Register.

Induction training will be provided to all new staff falling into these groups.

22. Advice

The Head of Housing and Health or the Corporate Health and Safety Advisor can be contacted for advice relating to management of materials suspected of containing Asbestos. If in doubt the rule is to leave it alone until risk assessed by a competent person.

If during the course of normal work practices suspected asbestos-containing material is encountered, the following procedures should be followed:

23. Contractors / Employees

Action to take on the disturbance of asbestos containing materials:

1. **STOP ANY WORK**, remove and keep all persons out of the area. Where practicable close or seal or lock off the area. Do not remove any equipment or material.
2. Stop other people entering the area e.g. prepare and display a 'potential Asbestos hazard keep out' sign.
3. If there is any dust present on clothing or on the person – remove clothing and place in a plastic bag and seal – and take a shower or wash thoroughly as soon as possible. Seek advice from the Corporate H&S Advisor.
4. Inform the line manager who will report the discovery to the Facilities and Corporate Buildings Manager or the Housing and Property Services Manager who will inform the MDDC Corporate Health and Safety Advisor.
5. The Responsible Manager will arrange for the property to be inspected and for any samples or air tests to be taken if required and will keep the premises management and the Corporate Health and Safety Advisor informed. Depending on the type and extent of the asbestos contamination - a specialist licensed asbestos contractor will be required to carry out the cleanup.
6. Following laboratory analysis the responsible Manager will advise the premises management and the Corporate Health and Safety Officer of the outcome and the proposed action.
7. On completion of any repair or removal work the respective Manager will advise the premises management and the Corporate Health and Safety Advisor when the area has been made safe.

The responsible Manager will ensure that all actions including areas where asbestos has been removed and analytical reports are included in the Asbestos register and copies forwarded to premises management and the Corporate Health and Safety Advisor.

For more information on asbestos go to www.hse.gov.uk/asbestos

Appendix 4 – Your guide to help you deal with Asbestos in your home

Where can I find out more information about asbestos?

- Information regarding asbestos can be found by visiting the Health and Safety Executive website at www.hse.gov.uk or by contacting them over the telephone on 0845 345 0055.
- Alternatively, please contact Mid Devon District Council on 01884 233024.

Mid Devon DISTRICT COUNCIL

Address: Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton, EX16 6PP

Telephone: 01884 233024

Fax: 01884 234318

Email: plannedmaintenance@middevon.gov.uk

Please note: Mid Devon District Council is presenting this leaflet to tenants to help provide information about asbestos. It provides advice and information available at the time of writing which may change. It is intended for guidance only and does not provide authoritative legal advice.

For large print, audio version or other languages please call 01884 233024

Your guide to help you deal with

Asbestos in your home

- Facts about asbestos
- What should I do if I think I have asbestos in my home?
- What can be done about asbestos?
- Will Mid Devon District Council remove the asbestos?
- Common locations of asbestos
- Where can I find more information regarding asbestos?

www.middevon.gov.uk

Facts about asbestos

- Building materials containing asbestos were widely used between 1950 and 1980, particularly from 1960 onwards, as its fibres are strong and resistant to heat and chemicals.
- When asbestos is damaged it releases fibres into the air which can cause problems if breathed in.

What should I do if I think I have asbestos in my home?

- Don't panic as it is very unlikely that the levels of asbestos fibres found in the building will be harmful.
- Don't attempt to remove the asbestos lagging, spray coatings or large areas of insulation board yourself. Nobody should undertake the removal of asbestos unless they have obtained the HSE license to do so.
- If you are planning to carry out any DIY painting or alterations (this includes drilling and sanding) and it has been confirmed your home has asbestos, please contact Mid Devon District Council for advice and guidance before proceeding with this work.
- If you are at all concerned that you might have damaged or aging asbestos, please do not hesitate to contact one of our members of staff trained in dealing with asbestos on **01884 233024**.

What can be done about asbestos?

- As a landlord, we have a legal duty to register each property that has asbestos.
- We have carried out a representative survey of all properties and identified all known locations of asbestos.
- Depending on the severity of the asbestos material found in your home, we will either repair the material usually by sealing or enclosing it, or we will remove it, especially where it is badly damaged or deteriorated.

Will Mid Devon District Council remove the asbestos?

- We will manage and regularly monitor all asbestos found in your home.
- Not all asbestos will be immediately removed. However, we will carry out a programme of removal where asbestos is found to be in disrepair and needs replacing.
- Asbestos materials in a good condition that can not readily be damaged are often best left where they are.
- The general rule for asbestos removal is: if undamaged and completely sealed, leave it alone.

The common locations of asbestos in the home



Appendix 5 - Action plan

300 Surveys per annum £200 per survey, including samples	2024-2025	=	£60,000.00
	2025-2026	=	£60,000.00
Re-inspections 20% per annum	annual cost		£25,000.00
Planned Removals costs from Gwella and Wakeham 2024-2025 SOR's	2024-2025		£35,000.00
	2025-2026		35,000.00

Assumption that every property allows access

If property occupied and acm in reasonable condition leave due to prohibitive cost of decant for licensed work

Leaseholders are to be included, although MDH will need to consult with the leaseholders and have a good rationale for removal

The list of works has been based on material and priority assessment scores over 10, a single material assessment score over 5 or a medium risk level rating.

Material and Priority Assessment scores over 10

Flat 13	Cockles Rise	Crediton	EX17 3JB	First Floor	Kitchen	Insulating Board Boxings	Encapsulate and remove when void £500.00
76	Ford Road	Tiverton	EX16 4BE	Other	Loft	Panel	Survey required as refers to 74 Ford Rd
8	Ashley Close	Uffculme	EX15 3BW	Ground Floor	Store	Insulating board panel	£600.00
4	Ford Road	Bampton	EX16 9LW	First Floor	Bedroom Rear	Ceiling Boards	£1,300.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Cupboard	Cement panels	£500.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Bedroom Front	Cement Panel	£500.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Bedroom Rear	Cement panels	£500.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Lounge	Cement panels	£500.00

14	Knightswood	Cullompton	EX15 1ET	Ground floor	Family room	Panel	£1,300.00
7	Market Close	Bampton	EX16 9NU	Ground Floor	Lounge	Insulating board panel	£1,300.00
26	Prospect Way	Lapford	EX17 6QB	Ground Floor	Cupboard	Insulating board panel	£1,300.00
30	Prospect Way	Lapford	EX17 6QB	Ground floor	Lounge	Insulating board panel	£1,300.00
3	Somerville Park	Willand	EX15 2PB	Ground Floor	Kitchen	Ceiling Boards	£500.00
34	Sunnymead	Copplestone	EX17 5NQ	Ground floor	Lounge	Ceiling panel	Survey with wakeham
39	Westfield	Bradninch	EX5 4QU	First Floor	All	Ceiling	£2,500.00
39	Westfield	Bradninch	EX5 4QU	Ground Floor	All	Ceiling Lining	£2,500.00

There are 11 MA assessment scores of over 5

50	Butt Parks	Crediton	EX17 3HE	Ground Floor	External	Downpipes	Survey £200.00
10	Churchill Drive	Crediton	EX17 2DW	Ground floor	Loft space	Wall cladding	Encapsulate £1500.00
20	Brady Close	Sandford	EX17 4LQ	Ground Floor	Porch	Ceiling Boards	Survey £200.00
19	Culver Close	Bradninch	EX5 4NY	Roof	Loft space	Cement debris	Survey £200.00
11	Heggadon Close	Bradninch	EX5 4NQ	Ground floor	Store cupboard	Lining Board	Survey £200.00
7	Knightswood	Cullompton	EX15 1ET	Ground floor	External store	Ceiling panel	Survey £200.00
15	Market Close	Bampton	EX16 9NU	Ground floor	External	Roof	Survey £200.00
20	Prospect Way	Lapford	EX17 6QB	Ground Floor	Lounge	Insulating board panel	£1,300.00
Flat 122	St Andrews Estate	Cullompton	EX15 1HZ	Ground Floor	Lounge	Vent	Monitor
Flat 122	St Andrews Estate	Cullompton	EX15 1HZ	Ground Floor	Bathroom	Box riser	When void £2,000.00
13	Sunnymead	Copplestone	EX17 5NQ	Roof	Roof	Undercloaking	When renewing roof

There are 7 medium risk level scores

12	Churchill Drive	Crediton	EX17 2DW	Roof	Loft	Party wall	Encapsulate £1,500.00
83	Higher Cotteylands	Tiverton	EX16 5BL	Ground Floor	Store	Cement panels to coal store	£200.00
Flat 7	Appledore Close	Cullompton	EX15 1ER	First Floor	Lounge	No Sample	Sample survey

							required
Flat 7	Prowses	Hemyock	EX15 3QG	Garden	Bin Store	Insulating board panel	£1,300.00
43	Shortlands Road	Cullompton	EX15 1HW	Ground Floor	External	Soffit	Novus 2024 – 2025 if required
Flat 1	Wyndham Road	Silverton	EX5 4JU	Ground Floor	Store	AIB	£1,300.00
21	Yeo View	Yeoford	EX17 5HY	Roof	Roof	Felt	Survey £200.00

Communal areas

Fir Close 39 & 40	Cullompton	EX15 2PZ	Ground floor	Ceiling panels	Porch		£2,600.00
Fir Close 39 & 40	Cullompton	EX15 2PZ	Ground floor	Ceiling board	Bin store ceiling		£2,600.00
Highland Terrace 82 to 85	Cullompton	EX15 3EW	Ground floor	Ceiling panel	Porch		£2,600.00
Highland Terrace 82 to 85	Cullompton	EX15 3EW	Ground floor	Ceiling board	Bin store ceiling		£5,200.00
Prowses 1 to 11	Cullompton	EX15 3QG	Ground floor	Ceiling panel	Bin store ceiling		£2,600.00
Churchills 2 to 8 Evens	Cullompton	EX15 3QN	Ground floor	Ceiling panels	Bin store ceiling		£1,300.00
Churchills 2 to 8 Evens	Cullompton	EX15 3QN	Ground floor	Ceiling panels	Porch		£1,300.00
Prowses 12 to 18	Cullompton	EX15 3QN	Ground floor	Ceiling panel	Porches Bin Stores		£6,500.00
Siddalls Gardens 21 to 21A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Siddalls Gardens 22 to 22A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Siddalls Gardens 23 to 23A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Siddalls Gardens 24 to 24A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Boyes Close 11 & 12	Tiverton	EX16 7DB	Ground floor	Ceiling panels	Bin store ceiling		Survey £200.00
Boyes Close 14 & 15	Tiverton	EX16 7DB	Ground floor	Ceiling panels	Bin store ceiling		Survey £200.00
Boyes Close 4 & 5	Tiverton	EX16 7DB	Ground floor	Ceiling panels	Bin store ceiling		£1,300.00
Brays Close 11 to 16	Crediton	EX17 3HZ	Second floor	Soffit Board	Roof		Survey £200.00
Brays Close 23 to 28	Crediton	EX17 3HZ	Second floor	Soffit Board	Roof		Survey £200.00

Wyndham Road 1 to 11	Exeter	EX5 4JU	Ground floor	Ceiling panels	Bin store ceiling	£5,200.00
Wyndham Road 1 to 11	Exeter	EX5 4JU	Ground floor	Ceiling panels	canopy	£5,200.00
Wyndham Road 13 to 23	Exeter	EX5 4JU	Ground floor	Ceiling panels	Bin store ceiling	£2,600.00
Wyndham Road 25 to 31	Exeter	EX5 4JU	Ground floor	Ceiling panels	Bin store ceiling	£2,600.00

Appendix 6 - Asbestos Management Plan relating to a non domestic locations

The duty to manage asbestos in non-domestic premises is set out in Regulation 4 of the 2012 Regulations. The duty to management asbestos in non-domestic premises does not apply to individual council houses but does apply to all non-domestic premises like factories or shops. It can also apply to the 'common parts' of multi-occupancy domestic premises, like purpose-built flats. The common parts do not cover individual flats, but do include:

foyers and corridors

lifts and lift-shafts

staircases

roof spaces

gardens and yards

outhouses and garages

Because the duty to manage asbestos in non-domestic premises applies to the common parts of multi-occupancy domestic premises there is some overlap with the approach taken in this management plan and the specific duty to manage asbestos in non-domestic premises. However where the specific duty to manage asbestos in non-domestic premises applies the requirements of that duty must be complied with.

Although this management plan is not prepared in relation to the duty to manage asbestos in non-domestic premises It should be noted that that the Council's duty to manage asbestos in non-domestic premises requires the following site specific steps to be taken for each premises

- a) assess if there are asbestos-containing materials (ACMs) present, the amount, where they are and their condition
- b) presume materials contain asbestos unless there is strong evidence that they do not
- c) make, and keep up to date, a record or register of the location and condition of the ACMs or presumed ACMs
- d) assess the risk of anyone being exposed to airborne fibres from the ACMs
- e) write an asbestos management plan to manage the risk, put the plan into action, monitor it and review it every 12 months or sooner if necessary
- f) monitor the condition of any ACMs or suspected ACMs

g) provide information on the location and condition of the ACMs to anyone who may work on or disturb them, including the emergency services.



Report for: Cabinet

Date of Meeting: 15 October 2024

Subject: **REVIEW OF MID DEVON HOUSING HOARDING POLICY**

Cabinet Member: Cllr Simon Clist Cabinet Member for Housing, Assets and Property and Deputy Leader

Responsible Officer: Simon Newcombe – Head of Housing and Health

Exempt: None

which are Exempt from publication under paragraph 3, Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) as it contains information relating to the financial or business affairs of any particular person (including the authority holding that information)

Wards Affected: All

Enclosures: Annex A – Hoarding Policy
Annex B – Hoarding Policy Equality Impact Assessment

Section 1 – Summary and Recommendation(s)

A hoarding disorder is where someone acquires an excessive number of items and stores them in a chaotic manner, usually resulting in unmanageable amounts of clutter. The Care Act 2014 requires local authorities to protect individuals from self-neglect, it also requires housing providers to ensure the health and safety of tenants, their neighbours and staff. There are additional requirements set out on in several statutory consumer standards published by the Regulator of Social Housing (RSH) where addressing where hoarding/tenant wellbeing alongside ensuring safe and well-maintained houses outcome must be met.

This Policy sets out Mid Devon Housing (MDH) methodology in supporting vulnerable adults who hoard and self-neglect using a multi-agency, person centred approach that also addresses health and safety risks.

Recommendation:

That Cabinet adopt the updated MDH Hoarding Policy and Equality Impact Assessment contained in Annexes A and B respectively as recommended by the Home PDG.

Section 2 – Report

1 Introduction

- 1.1 In addition to Care Act 2014 responsibilities, the RSH Neighbourhood and Community Standard requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes. Furthermore, the RSH Safety and Quality Standard sets out that providing safe and well-maintained homes is a fundamental responsibility of all registered providers.
- 1.2 As part of ensuring the wider safety of tenants in the design and delivery of landlord services, registered providers should have an effective approach to proactively identifying the risks to tenants' safety and eliminating or mitigating those risks.
- 1.3 The RSH requires registered providers to use a co-regulatory approach and they regard councillors as responsible for ensuring that providers' businesses are managed effectively and comply with all regulatory requirements. Consequently, it is important that councillors scrutinise and approve the relevant policy approaches adopted by MDH. More information on co-regulation is set out in section 3.5 below.
- 1.4 Hoarding cases are complex due to the way hoarding impacts on different aspects of an adult's life: their home, their social connections, physical and mental health and environment. Adults who hoard and self-neglect therefore require the support and services of different agencies and council partners over the course of the intervention period.

2 Review of the Hoarding Policy

- 2.1 The Hoarding Policy was last reviewed in 2019 and since that time the Regulatory Framework has changed with increased emphasis on tenancy sustainment and an expectation that registered providers will provide support directly to tenants to help them maintain their tenancy or licence.
- 2.2 The revised policy does not refer to lifestyle choices or lack of education but focuses on the support that can be provided to tenants, including signposting if required.
- 2.3 Neighbourhood Officers will agree action plans with tenants when a report of hoarding or clutter has been reported to them which should be realistic,

proportionate and tailored to individual tenant, taking into account the following factors:

- The tenant's mental or physical condition and their ability to carry out the work;
 - The severity of the condition of the tenant's property;
 - The risk of serious harm or accident as a result of the condition of the property;
 - Resources of support agencies involved with the tenant;
 - Referrals to agencies to support the tenant.
- 2.4 The revised policy defines the process which is to be adopted based on the 'clutter scale'. The 'clutter scale' is key to the hoarding process as it identifies the severity of the hoarding activity. Monitoring and regular visits should take place based on the clutter scale rating to review the progress of the action plan. The action plan should be confirmed in writing to the tenant:
- Clutter Scales 1, 2 or 3 do not normally require intervention from MDH but could be monitored to ensure that the situation does not escalate
 - Clutter Scales 4 and above will receive regular visits which is dependent on the severity of the hoard, the engagement of the tenant and their support network. Neighbourhood Officers will decide the frequency of the visits.
- 2.5 The revised policy provides additional details of multi-agency approaches and solutions. It is recognised that it may be necessary to involve a range of agencies to play a part in trying to reduce hoarding issues and ultimately to improve the quality of life for the tenant and their household.
- 2.6 There will be instances where a tenant will not engage with the process but the policy details that enforcement action should only be considered where it is necessary in the circumstances of the case. Where there is a high risk of fire or other health and safety issues, enforcement action may begin earlier, but we will continue to try and work with the tenant during this period of the time.
- ### **3 Consultation and Co-Regulation**
- 3.1 Tenants were invited to comment on the draft policy between 22nd July 2024 and 22nd August 2024.
- 3.2 Members of the Homes PDG were invited to comment on the draft policy between 22nd July 2024 & 22nd August 2024.
- 3.3 Partner Agencies such as the Devon and Somerset Fire and Rescue Service and MDDC Public Health and Environmental Health Services Teams were also invited to comment on the draft policy. Confirmation that the MDDC Healthy Homes Grant was not available to Council tenants was added as a result of this consultation.

- 3.4 Despite a limited response to consultation from tenants, it is important that tenants are fully aware of the updated policy. To this end, should the policy be adopted, MDH will proactively signpost the policy on our webpages/Facebook pages and in the next tenant newsletter. Where relevant, particularly in relation to queries, service requests or complaints we will also ensure specific tenants or other stakeholders are also aware of the updated policy as required.
- 3.5 Under housing legislation including the Social Housing (Regulation) Act 2023, the RSH take co-regulatory approach. In the context of a local authority registered provider such as MDH this means:
- councillors are regarded as responsible for ensuring that providers' businesses are managed effectively and that providers comply with all regulatory requirements
 - providers must support tenants to shape and scrutinise service delivery and to hold officers and councillors to account

This is important context in the determination and adoption of new or updated policy and monitoring of policy compliance and performance.

4 Historic Performance

- 4.1 The eviction of tenants who hoard is extremely rare. The last eviction due to hoarding was in 2016. Conversely, the service continues to work with several significant hoarding cases every year where historic and new policy approaches will continue support resolutions and sustained tenancies where safety and tenant wellbeing issues are addressed.

5 Safeguarding and Vulnerable Tenants

- 5.1 The policy sets out to involve the individual in all aspects of decision-making in order to achieve the best outcome to improve their health, wellbeing and environment. A person-centred approach is vital to encourage the individual to engage with services and consent to support or interventions.
- 5.2 An adult who hoards/self-neglects may have a complex range of needs and require support from a number of services. Hoarding impacts several areas of an individual's life; their home, their social connections, physical and mental wellbeing, and their environment. An effective approach to getting the best outcome for the individual is to adopt a multi-agency approach, whereby agencies work together and consult with one another to agree actions in the best interests of the individual.

6 Policy Review

- 6.1 MDH will review this Policy every 5-years and as required to address legislative, regulatory, best practice or operational issues. However, the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.

6.2 Where material or significant amendments are required the policy will receive a full review and will be brought back to the Homes PDG and Cabinet for consideration. Full tenant consultation will also take place.

7 Recommendation

7.1 In accordance with the above, the following recommendation is made:

- That the PDG recommends that Cabinet adopt the updated MDH Hoarding Policy and Equality Impact Assessment contained in Annexes A and B respectively

Financial Implications

Housing management officers are sometimes required to manage cases involving properties that are either cluttered or which are being used to hoard large amounts of possessions, including animals. This can lead to damage to the property. This may also result in rodent or insect infestations, blocked drains and other problems that may also affect neighbouring properties. Rechargeable repairs costs can be inflated if there is damage which can prove at times difficult to recover.

Legal Implications

A multi-agency approach and the sharing of information are fundamental to the successful implementation of this policy. Such information sharing must be undertaken in accordance with the Data Protection Act 2018 and the General Data Protection Regulations.

Risk Assessment

Hoarding may have serious implications which impact upon health and safety and for this reason the risk it poses is regularly reviewed as part of the risk management framework. Failure to provide MDH staff with policies to use in the course of their day to day activities could result in a less consistent and effective service.

Impact on Climate Change

The Policy has no direct impact on climate change.

Equalities Impact Assessment

An Equalities Impact Assessment has been completed for this policy. National research and professional accounts suggest that elderly people are more likely to be experiencing a hoarding disorder due to frailty, social isolation and the nature of the disorder which tends to escalate over time. The policy will meet its obligations under the Equalities Act; it will not discriminate against any particular group and each individual will be treated fairly and without discrimination.

The Equalities Impact Assessment is attached to this report in Annex B.

Relationship to Corporate Plan

Homes are a priority for the Council and in the context this policy this includes supporting the delivery of several key objectives including ensuring our tenants feel safe, secure and happy in our homes.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett

Agreed by or on behalf of the Section 151

Date: 29 August 2024

Statutory Officer: Maria de Leburne

Agreed on behalf of the Monitoring Officer

Date: 29 August 2024

Chief Officer: Simon Newcombe

Agreed by or on behalf of the Chief Executive/Corporate Director

Date: 22 August 2024

Performance and risk: Steve Carr

Agreed on behalf of the Corporate Performance & Improvement Manager

Date: 22 August 2024

Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Simon Newcombe, Head of Housing and Health

Email: snewcombe@middevon.gov.uk

Telephone: 01884 255255

Background papers:

Current MDH Hoarding Policy: [Hoarding Policy \(middevon.gov.uk\)](https://www.middevon.gov.uk/hoarding-policy)

[Regulator of Social Housing Consumer Standards – Summary Code of Practice](#)



Hoarding Policy

This Policy was produced in 2024 and is version 3.00

This Policy was adopted by Cabinet on xxxx

MDH will review this Policy every 5-years and as required to address legislative, regulatory, best practice or operational issues. However the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.

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1 Introduction

- 1.1 This Policy outlines Mid Devon Housing's (MDH), approach to identifying and dealing with issues of hoarding and clutter in MDH properties.
- 1.2 People will often collect items at some point throughout their life, however, there is a percentage of people for whom collecting becomes an unmanageable pattern of behaviour.
- 1.3 Hoarding is a recognised mental health problem.
- 1.4 Definition of Hoarding Disorder
- 1.5 Hoarding disorder was added to the ICD-11 (International Classification of Diseases – 11th Revision) in 2018. The 11th edition of the ICD states that “hoarding disorder is characterised by accumulation of possessions due to excessive acquisition of or difficulty discarding possessions, regardless of their actual value”.
- 1.6 People who hoard may also self-neglect as they are unable to access facilities but it is recognised that self-neglect is not a concern for all those that hoard. People who hoard experience distress or difficulty living in their environment because of the following:
 - Acquiring possessions
 - Restricted use of living spaces because they are so full of objects
 - Getting rid of possessions causes distress or is simply not possible, even when they no longer seem to be needed, are no longer useful or are causing real problems because of taking up too much space
- 1.7 Failure to identify and address hoarding carries a number of risks:
 - An increased risk of fire in the property and the possibility of the fire spreading to neighbouring properties
 - Fire and Rescue services can be impeded by the amount of items kept in the property
 - An increased risk of accident or harm to the tenant or household members
 - Difficulty for Housing Officers to carry out inspections or complete safety checks
 - An increased risk of repairs in the property including damp and mould issues
 - An increase in management costs due to household clearance and any repairs to the property
 - An increased risk of vermin infestation, both in the property and to adjoining properties

- 1.8 For the reasons set out above, preventative measures must be put in place to reduce the health and safety risks to the tenant and others, as well as reduce neglect and/or damage to the property. Where MDH is not successful in working with the tenant to encourage and adopt changes in behaviour, MDH will take appropriate enforcement actions in connection with any breaches of the tenancy agreement.

2 Aims and Objectives

- 2.1 The aim of the Policy is to set out the approach to hoarding by MDH tenants and has the following objectives:

- To take action to stop hoarding as quickly and effectively as possible.
- To take a balanced approach using a combination of measures including support, prevention, early intervention, and enforcement.
- To provide a pro-active approach in the management of casework.
- To treat those who hoard and those affected by hoarding with tact and sensitivity.

- 2.2 The objective of the Policy is to provide clear guidance to Officers and tenants on the steps and process to be taken when cases of hoarding have been identified.

3 Regulatory Framework and Context

- 3.1 The Social Housing (Regulation) Act 2023 has impacted the regulatory framework for social housing and introduced a new proactive, consumer regulation regime focussed on meeting the needs of tenants. One aim of the legislation and regime is to ensure that providers of social housing, such as the Council, keep its properties and estates safe and clean.

- 3.2 The Regulator of Social Housing (RSH) adopts a co-regulatory approach and regards councillors as responsible for ensuring that providers' businesses are managed effectively and that providers comply with all regulatory requirements.

- 3.3 As part of ensuring the wider safety of tenants in the design and delivery of landlord services, registered providers should have an effective approach to proactively identifying the risks to tenants' safety and eliminating or mitigating those risks.

- 3.4 As part of the new consumer regulation regime, from April 2023, the RSH introduced a series of 22 mandatory Tenant Satisfaction Measures (TSMs) creating a new system for assessing how well social housing landlords in England are doing at providing good quality homes and services. These measure include those applicable directly to building safety as well as those based on tenant perception surveys setting out tenants views on performance which will include responsible neighbourhood management.

3.5 The TSMs considered under the Hoarding Policy include:

- TP01 - Overall satisfaction
- TP08 - Agreement that the landlord treats tenants fairly and with respect
- TP09 - Satisfaction with the landlord's approach to handling of complaints
- TP11 - Satisfaction that the landlord makes a positive contribution to neighbourhoods

3.6 The following Policies are related to this Policy:

- MDH Anti-social Behaviour Policy & Procedures
- MDH Tenancy Management Policy
- Corporate Health and Safety Policy
- MDH Vulnerability Policy
- Corporate Housing Assistance Policy

4 Tenancy Management

4.1 MDH has operational staff that visit tenants and their households, at home. Officers are required to identify any issues that arise when properties are cluttered or are being used to hoard large amounts of possessions or animals and report them to the relevant Neighbourhood Officer.

4.2 In extreme cases, piles of clutter can become a health and safety risk and can result in trips, slips and falls. If the home is difficult to clean, living conditions can be unhygienic and can lead to rodent or insect infestations, blocked drains and other problems that may also affect neighbouring properties. Officers will identify any risks to the tenant, their household, visitors or neighbouring properties and take appropriate action in accordance with the severity of the risk.

4.3 Issues with hoarding/clutter can generate complaints of anti-social behaviour. These will be dealt with in line with MDH's Anti-social Behaviour Policy and Procedures. Complaints may include those relating to untidy gardens, unwelcome odours from the property or infestation of vermin.

4.4 MDH is likely to become aware of hoarding/clutter issues:-

- During routine planned maintenance works due to the property (gas/electrical checks or property upgrades)
- When complaints of anti-social behaviour are received; for example, those concerning the presence of vermin or clutter in outside spaces

- When reports of welfare concerns from family members or neighbours are received
- During Tenancy Home Checks
- When receiving reports from other agencies involved with the tenant

4.5 When an issue has been identified the Neighbourhood Officer will regularly visit the property and will put together an action plan and risk assessment to work with the tenant to reduce the hoarding issues and to address any health and safety concerns. We understand that it may be a slow process in reducing belongings or items from the property.

5 Action Plans

5.1 Neighbourhood Officers will agree action plans with tenants which should be realistic, proportionate and tailored to the individual tenant, taking into account the following factors:

- The tenant's mental or physical condition and their ability to carry out the work;
- The severity of the condition of the tenant's property;
- The risk of serious harm or accident as a result of the condition of the property;
- Resources of support agencies involved with the tenant;
- Referrals to agencies to support the tenant.

5.2 Action plans will contain an initial risk assessment but this may be altered as the hoard is addressed.

5.3 Action plans should be agreed with the tenant wherever possible. If a tenant will not engage with an action plan MDH may use legal action e.g. obtaining an injunction, demotion of the tenancy or possession of the property.

5.4 The 'clutter scale' is key to the hoarding process as it measures the severity of the hoarding and its impact on a person's life. Monitoring and regular visits should take place based on the clutter scale to review the progress of the action plan. The action plan should be confirmed in writing to the tenant:

- Clutter Scales 1, 2 or 3 do not normally require intervention from MDH but could be monitored to ensure that the situation does not escalate.
- Clutter Scales 4 and above will receive regular visits which is dependent on the severity of the hoard, the engagement of the tenant and their support network. Neighbourhood Officers will decide the frequency of the visits.

6 Multi Agency Working

- 6.1 It is recognised that it may be necessary to involve a range of agencies to play a part in trying to reduce hoarding issues and ultimately to improve the quality of life for the tenant and their household.
- 6.2 MDH will work with a range of agencies such as Social Services, Community Mental Health Teams, the Fire Service, Environmental Service and family members. It is worth noting that the limited capacity of some of these services may impact on our ability to meet our on timescales.
- 6.3 Where family and friends are already involved, and willing to co-operate, we encourage their assistance, however in doing this we will always comply with data protection principles. Our priority is to engage with the tenant wherever possible.
- 6.4 Where the tenant is already engaging with a support service, we will try to work alongside this existing arrangement. This is important where the hoarder already has an established relationship as hoarders can at times be mistrustful of new services.
- 6.5 Where the support is offered but refused, it is important that this is noted as this may be required as evidence later if legal action is required.
- 6.6 A referral should be made to the Fire Service where it is believed that a tenant could be vulnerable to fire and ask that a fire safety visit is made.
- 6.7 Where there is a concern about the tenant's wellbeing, the Neighbourhood Officer will encourage the tenant to speak to their GP.
- 6.8 The Neighbourhood Officer can refer the tenant to Care Direct or Adult Social Care if necessary and there are safeguarding concerns. This generally requires consent of the person being referred, unless they lack the capacity to consent, or there is an overriding duty of care.

7 Tenancy Enforcement

- 7.1 Enforcement action should only be considered where it is necessary in the circumstances of the case. Where there is a high risk of fire, enforcement action may begin earlier, but we will continue to try and work with the tenant during this period of the time.
- 7.2 Enforcement action may include:
 - Applying for an injunction
 - Taking possession proceedings

- Applying for a Closure Order
- Demotion of the tenancy

7.3 If a possession order is obtained at Court it may say that possession is not to be enforced providing that the tenant complied with certain conditions within a given time frame, for example allowing MDH access to the property or improve the condition of the property. If the tenant does not comply with the conditions in accordance with the order, MDH may then seek to enforce the order and apply to Court for a warrant of possession.

8 Additional Support

8.1 If you need help or are concerned for someone's safety and wellbeing please use the following contact details for key services and organisations that may be able to help.

- [Devon Safeguarding Adults Partnership.](#)
- [The Hoarding Ice-Breaker Form](#) empowers people whose health, wellbeing or safety has been adversely affected by hoarding to start a conversation with a medical professional
- [Devon and Somerset Fire and Rescue Service](#) offer free home safety visits and can often install free smoke alarms and specialist equipment to help residents keep safe in their own homes
- [Hoarding disorder - NHS.](#)
- [Hoarding UK](#) provides information, support for hoarders and agencies, including local support groups.
- [Help for Hoarders](#) provides information, support and advice for hoarders and their families, including online support forums
- Mid Devon Environmental Health Services, [please contact us](#) or call 01884 255255
- [The Association of Professional De-clutterers & Organisers \(UK\)](#) are a professional network of those in the de-cluttering and organising industry.
- [Change your Space - Organising and Decluttering in Devon & Somerset](#)
- [Your Sorted Nest](#)

- 8.2 Mid Devon District Council's Healthy Homes is not available to MDH Housing Tenants. Please refer to [Housing Assistance Policy 2022-2025](#). Public Health may investigate filthy and verminous properties with a view to taking enforcement action if needed.

9 Complaints

- 9.1 MDH tries to get things right the first time and when it does, it would love people to let it know. It's great for MDH to receive positive comments or feedback, so if people wish to complement MDH staff for doing a great job, the Council would love to hear from them.

- 9.2 If things do go wrong the Council is committed to:

- Dealing with complaints and comments quickly and effectively; and
- Using complaints, comments and compliments to review and improve its services

- 9.3 When tenants contact MDH to tell it they are dissatisfied with the service provided, the Council will offer them the choice to have an informal conversation to see if things can be put right quickly, without the need for a formal investigation.

- 9.4 The Housing Ombudsman Service advise that a complaint must be defined as:

'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents'.

- 9.5 Where a tenant considers that the Council has given a poor service or has got something wrong, they may tell a member of staff in the first instance. This does not need to be treated as a formal complaint (unless the complainant asks the Council to do so) and may be resolved 'there and then' by way of an apology or plan of action. Any comments provided will be used to take appropriate action, or give information.

- 9.6 If a tenant does not want to do this or is unhappy with the response, they may make a formal complaint, which can escalate from stage 1 or stage 2 if they are still not satisfied with the response. Having been through stages 1 and 2 and if they are still not satisfied, the tenant may contact the Housing Ombudsman Service.

- 9.7 MDH's complaints procedure is detailed on Mid Devon District Council website: [Feedback and Complaints](#)

10 Equality Impact Assessments

- 10.1 MDH completes an equality impact assessment each time it develops or reviews a policy, procedure or service. The assessment is to help make sure decision making is fair and does not present any barriers or disadvantage to customers from any protected group (including disability) under the Equality Act 2010.

Equality Impact Assessment

Purpose of the Equality Impact Assessment process:

The Equality Act (2010) introduced the [Public Sector Equality Duty](#) (PSED) requiring public bodies to give due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Consideration must be given to the protected characteristics covered by the Equality Act (2010). Assessments should consider relevant evidence relating to persons with protected characteristics in relation to assessments of potential impact.

The purpose of an Equality Impact Assessment (EIA) is to ensure that policies, functions, plans or decisions (hereafter referred to as 'policy/ decision') do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised. An EIA is not required for a decision in relation to an individual.

Screening is a short exercise to determine whether a policy/ decision is relevant to equalities, and if so, whether a full EIA should be conducted.

Section 1: Equality Impact Assessment Screening

Title and description of the policy/ decision:	MDH Hoarding Policy		
Job title of the person(s) undertaking the assessment:	MDH Policy Officer		
Council service:	Mid Devon Housing		
Date of assessment:			
What are the aims, purposes, objectives and proposed outcomes of the policy/ decision?			
<p>The aim of the Policy is to set out our approach to hoarding by our tenants and has the following objectives:</p> <ul style="list-style-type: none"> • To take action to stop hoarding as quickly and effectively as possible. • To take a balanced approach using a combination of measures including support, prevention, early intervention, and enforcement. • To provide a pro-active approach in the management of casework. • To treat those who hoard and those affected by hoarding with tact and sensitivity. <p>The objective of the Policy is to provide clear guidance to Officers and Tenants on the steps and process to be taken when cases of hoarding have been identified.</p>			
Who may be affected by the policy/ decision?	MDH Tenants		
How have stakeholders been involved in the development of the policy/ decision? E.g. a consultation exercise	<p>Consultation exercise was undertaken between 22 July – 22 August 2024 which included:</p> <ul style="list-style-type: none"> • Tenants • Members of the Homes PDG • Strategic Partners 		
Will there be scope for prompt, independent reviews and appeals against decisions arising from the policy/ decision?	MDH reviews its practices as lessons learned when dealing with complaints raised by tenants		
To which part(s) of the Public Sector Equality Duties is the policy/ decision relevant:			
	Yes	No	Details
1. Eliminate unlawful discrimination	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Having a clearly defined policy ensures consistency of approach and ensures that no tenant or resident is treated more fairly or unfairly than any other.
2. Advance equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	
3. Foster good relations between different groups	<input type="checkbox"/>	<input type="checkbox"/>	

Which of the protected characteristics is the policy/ decision relevant to?

Tick and briefly describe any likely equalities impact (positive, negative, or neutral)

Characteristic	Positive	Negative	Neutral	Comments
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Pregnancy/ maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Marriage and Civil partnership*	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*Applies only to Employment and the duty to give regard to the elimination of discrimination.

Decision by Corporate Manager to recommend this policy/ decision for an Equality Impact Assessment?

Yes/ No

If the answer is “Yes”, please continue to the Section 2 and complete the Equality Impact Assessment. If the answer is “No”, please give a brief reason here.

The policy will eliminate unlawful discrimination and is neutral impact against the specified protected characteristics.

MDH has a collection of housing related policies. The use of these helps to ensure that service delivery is consistent and fair. These are currently being reviewed with the aim of aligning them more closely with the Regulatory Standards.

Furthermore, there is a regulatory requirement for registered providers of social housing to tailor their services to meet the needs of tenants. MDH collects data on the diversity of tenants and endeavours to tailor services to meet the needs of all tenants and to enable compliance to be monitored.

Where a tenant is considered vulnerable MDH will collaborate closely with them to avoid possession action where possible, and each case will be referred to the Neighbourhood Team Leader Income and/or other support services before any eviction order is sought.

National research and professional accounts suggest that elderly people are more likely to be experiencing a hoarding disorder due to frailty, social isolation and the nature of the disorder which tends to escalate over time. The policy will meet its obligations under the Equalities Act; it will not discriminate against any particular group and each individual will be treated fairly and without discrimination.

EIA Screening Complete

Section 2: Equality Impact Assessment

Evidence and Consultation
<p>What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy/ decision? E.g. consultations, national or local data and/or research, complaints or customer feedback. Please identify any gaps in the available information that might make it difficult to form an opinion about the effect of the policy on different groups.</p>

Please complete this table for all the Protected Characteristics. If you have identified any negative impacts you will need to consider how these can be justified or where possible mitigated either to reduce or remove them. (Please add rows where needed)

Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
Sex			
Age			
Disability			
Religion or Belief			
Race			
Sexual Orientation			
Gender Reassignment			

Pregnancy/ maternity			
Marriage and Civil partnership (Applies only to Employment and the duty to give regard to the elimination of discrimination)			

Please provide details of arrangements to monitor and review the policy/ decision and any mitigating actions or actions to promote equality:

Please state where the EIA will be published (e.g. on the Mid Devon District Council website):

MDH Website

=====

Equality Impact Assessment Sign off

For completion by Corporate Manager

Are you prepared to agree and sign off the EIA?

Yes **No**

If "No", provide details of why and next steps:

Name: Simon Newcombe

Job Title: Head of Housing and Health

Date: 22 August 2024

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Report for: Cabinet

Date of Meeting: 15 October 2024

Subject: **MID DEVON HOUSING REPAIRS AND MAINTENANCE POLICY**

Cabinet Member: Cllr Simon Clist Cabinet Member for Housing, Assets and Property and Deputy Leader

Responsible Officer: Simon Newcombe – Head of Housing and Health

Exempt: None

which are Exempt from publication under paragraph 3, Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) as it contains information relating to the financial or business affairs of any particular person (including the authority holding that information)

Wards Affected: All

Enclosures: Annex A – MDH Repairs and Maintenance Policy
Annex B – MDH Repairs and Maintenance Policy
Equality Impact Assessment

Section 1 – Summary and Recommendation(s)

Under the Regulator of Social Housing’s (RSH) statutory Safety and Quality Standard Registered Providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.

Registered Providers are expected to have in place and comply with effective policies, procedures and processes in relation to repairs, maintenance and planned improvements that take into account tenants’ views and diverse needs. With a clearer, updated standard in place Mid Devon Housing (MDH) have taken the opportunity to bring together a several repairs and maintenance approaches into a single, new policy

document. This aims to provide clarity for tenants, the RSH and MDH more widely as to what our repairs service will provide and how it meets the Standard requirements.

Recommendation:

That Cabinet recommends to Council that the MDH Repairs and Maintenance Policy and Equality Impact Assessment be adopted as recommended by the Home PDG.

Section 2 – Report

1 Introduction

- 1.1 MDH is committed to ensure tenants' homes are well maintained by an efficient and effective repairs and maintenance service.
- 1.2 The MDH Repairs and Maintenance Policy serves to define, in broad terms, the principles that guide the repair and maintenance activities and the service standards that shall be implemented.
- 1.3 There are a range of legislative and regulatory responsibilities guiding the delivery of the Council's repairs and maintenance service which are referenced in the policy.
- 1.4 Whilst a tenant repairs handbook exists, there is no current existing similar policy and greater clarity is required as set out in the report summary.

2 RSH Consumer Standards

- 2.1 The RSH introduced new consumer standards in April 2024. One of these standards is the Safety and Quality Standard sets out the following requirements specifically relating to repairs and maintenance:
 - a) Registered providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.
 - b) Registered providers must enable repairs and maintenance issues to be reported easily.
 - c) Registered providers must set timescales for the completion of repairs, maintenance and planned improvements, clearly communicate them to tenants and take appropriate steps to deliver to them.
 - d) Registered providers must keep tenants informed about repairs, maintenance and planned improvements to their homes with clear and timely communication.
 - e) Registered providers must understand and fulfil their maintenance responsibilities in respect of communal areas

- f) Registered providers must ensure that the delivery of repairs, maintenance and planned improvements to homes and communal areas is informed by the needs of tenants and provides value for money.
- 2.2 The adoption of a formal Repairs and Maintenance Policy provides a key framework and reference point to demonstrate how we will achieve those points above.
- 3 Performance Monitoring**
- 3.1 The activities covered under the Repairs and Maintenance Policy will be subject to performance monitoring on a continuous basis and discussed with contractors as part of the regular operational and core group meetings.
- 3.2 Key areas for monitoring will be:
- Works completed on time
 - Works overdue
 - Works completed first time fix
 - Average repair and void time
 - Quality of work completed
 - Customer satisfaction
 - Appointments kept
 - Budgetary and expenditure control
- 3.3 The service quarterly performance monitoring report already provides tenants and members with key information on overarching repairs performance with the following indicators:
- Emergency repairs completed on time % (Target 100%)
 - Urgent repairs completed on time % (Target 95%)
 - Routine repairs completed on time % (Target 95%)
 - Repairs completed first visit % (Target 95%)
- 3.4 Feedback from our tenants on the quality of the service they receive is important in helping us to evaluate and improve the service. Customer satisfaction surveys will be carried out following the completion of a repair, as well as larger scale periodic perception surveys. Feedback from these surveys will be used to gauge overall tenant experience and help shape future service improvements.
- 4 Consultation and Co-Regulation**
- 4.1 Tenants were invited to comment on the draft policy between 01 and 31 July 2024.
- 4.2 Members of the Homes PDG were invited to comment on the draft policy between 01 and 31 July 2024.
- 4.3 No comments or concerns were raised by tenants or members.

- 4.4 Despite a lack of response to consultation, it is important that tenants are fully aware of the updated policy. To this end, should the policy be adopted, MDH will proactively signpost the policy on our webpages/Facebook pages and in the next tenant newsletter. Where relevant, particularly in relation to queries, service requests or complaints we will also ensure specific tenants or other stakeholders are also aware of the updated policy as required.
- 4.5 Under housing legislation including the Social Housing (Regulation) Act 2023, the RSH take co-regulatory approach. In the context of a local authority registered provider such as MDH this means:
- councillors are regarded as responsible for ensuring that providers' businesses are managed effectively and that providers comply with all regulatory requirements
 - providers must support tenants to shape and scrutinise service delivery and to hold officers and councillors to account

This is important context in the determination and adoption of new policy and monitoring of policy compliance and performance.

5 Safeguarding and Vulnerable Tenants

- 5.1 MDH records details of all vulnerable tenants to enable us to support their needs. This includes making reasonable adjustments in dealing with vulnerable tenants so that they are comfortable when we interact with them.
- 5.2 When repairs or maintenance are required MDH ensures that the tenant is communicated to by their preferred channel and that they understand the importance of allowing access to their home to complete the check.
- 5.3 Whilst officers and contractors attend homes to specifically carry out repairs or maintenance they will check any tenants observed who appear vulnerable or if there are safeguarding concerns which will be reported to the Neighbourhood Officer. The Neighbourhood Officer will then contact the tenant to establish if they need additional support to be able to sustain their tenancies.

6 Policy Review

- 6.1 MDH will review this Policy every 5-years and as required to address legislative, regulatory, best practice or operational issues. However, the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.
- 6.2 Where material or significant amendments are required the policy will receive a full review and will be brought back to the Homes PDG and Cabinet for consideration. Full tenant consultation will also take place.

7 Recommendation

- 7.1 In accordance with the above, the following recommendation is made:

- That the PDG recommends to Cabinet that it recommends to Council that the MDH Repairs and Maintenance Policy and Equality Impact Assessment be adopted.

Financial Implications

This report on its own does not give rise to any financial implication but implementation of the activities set out in the policy will have cost implications.

However, these will either be met from existing resources and funding or require separate business cases and appropriate approval to progress.

The Council's HRA revenue and capital budget and Medium-Term Financial Plan 2023-28 supports the activities required to maintain the Council's housing stock.

Legal Implications

The Council has statutory responsibilities under the Landlord and Tenant Act 1985, the Decent Homes Standard, the Defective Premises Act and the Housing Health and Safety Rating System (HHSRS) alongside the RSH Safety and Quality Standard 2024 to ensure that properties are maintained, meet the Decent Homes Standard and that, where appropriate, properties are assessed and steps taken with a view to avoiding or minimising the risk of responsive repairs.

Risk Assessment

Failure to have a Repairs and Maintenance policy in place would put the Council in breach of the regulatory framework. Failure to have adequate arrangements in place for Repairs and Maintenance could result in the Council failing to meet its statutory and contractual obligations.

Impact on Climate Change

The Policy has no direct impact on Climate Change

Equalities Impact Assessment

MDH collects data on the diversity of tenants and endeavours to tailor services to meet the needs of all tenants. Our housing estates must be accessible to those with disabilities and we have in place a regular schedule of inspections to ensure that all safety issues are identified and rectified as soon as possible. Information provided by MDH is available in alternative formats, upon request, in order to ensure that all those living on our estates understand the rights and responsibilities of the Council as a landlord, and tenants and other residents, individually.

The Equalities Impact Assessment is attached to this report in Annex B.

Relationship to Corporate Plan

Homes are a priority for the Council and in the context this policy this includes supporting the delivery of several key objectives; investing in our homes, monitoring tenant satisfaction and ensuring our tenants feel safe, secure and happy in our homes.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151
Date: 29 August 2024

Statutory Officer: Maria de Leiburne
Agreed on behalf of the Monitoring Officer
Date: 29 August 2024

Chief Officer: Simon Newcombe
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 16 August 2024

Performance and risk: Steve Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 22 August 2024

Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Simon Newcombe – Head of Housing and Health
Email: snewcombe@middevon.gov.uk
Telephone: 01884 255255

Background papers:

[Regulator of Social Housing Consumer Standards – Summary Code of Practice](#)



Repairs and Maintenance Policy

2024

This policy was produced in 2024 and is version 1.00

This policy was adopted by Council on xxxx

Review Frequency: MDH will review this Policy every 5-years and as required to address legislative, regulatory, best practice or operational issues. However the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.

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1 Introduction

- 1.1 The purpose of this document is to set out MDH's Repairs & Maintenance Policy.
- 1.2 MDH recognises that the efficient and effective repair and maintenance of its housing stock is an important service to tenants and leaseholders and an essential part of a much wider asset management function.
- 1.3 The overall aim of this Policy is to set a framework enabling the delivery of an effective maintenance service which fulfils MDH's statutory obligations, protects council assets, and offers value for money.
- 1.4 This policy applies to the housing stock of MDH which are dwellings let to tenants under secure, introductory, flexible secure and demoted tenancies. Where the term "Tenancy" or Tenancy Agreement is used in this policy it means one of these tenancies

2 Aims and Objectives

Aim

- 2.1 The aim of this policy is to ensure that MDH's repairs and maintenance service meet all of its legal and contractual obligations as a landlord and also to explain the tenant's responsibilities

Objective

- 2.2 The objective is to clarify what tenants can expect of MDH in relation to servicing, repairs and planned works.

3 Regulatory Framework and Context

- 3.1 Under the Regulator of Social Housing's Safety and Quality Standard Registered Providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.
- 3.2 The Regulator of Social Housing regard councillors as responsible for ensuring that providers' businesses are managed effectively and that providers comply with all regulatory requirements.
- 3.3 As part of the new consumer regulation regime, from April 2023, the RSH introduced a series of 22 mandatory Tenant Satisfaction Measures (TSMs) creating a new system for assessing how social housing landlords in England are doing at providing good quality homes and services.

3.4 The TSM's associated with this Policy are:

- TP02 – Satisfaction with repairs
- TP03 – Satisfaction with time to complete most recent repair
- TP04 – Satisfaction that the home is well maintained
- TP05 – Satisfaction that the home is safe
- RP02 – Repairs completed within target timescale

4 Related Legislation and Relevant Policies

4.1 Legislation:

- Social Housing Regulator Economic and consumer standards
- Homes (Fitness for Human Habitation) Act 2018 (HFHHA 2018)
- Housing Acts 1985,1988,1996,1998 and 2004
- The Secure Tenants of Local Authorities (Right to Repair) Regulations SI. 1994 No 133
- The Secure Tenants of Local Authorities (Compensation for Improvements) regulations 1994, SI 1994 No 613
- The Leasehold Reform, Housing and Development Act 1993
- Landlord and Tenant Act 1985
- Defective Premises Act 1972
- Landlord and Tenant Act 1985 – Section 11
- Defective Premises Act 1972 - Section 4
- Environmental Protection Act 1990 – Part III
- Fire Safety (England) Regulations 2022
- Gas Safety (Installation and Use) Regulations 1998
- Regulatory Reform (Fire Safety) Order 2005.
- Commonhold and Leasehold Reform Act 2002
- Equalities Act 2010
- Control of Asbestos Regulations 2012
- Housing Health & Safety Rating System

4.2 Related Policies:

- Tenancy Agreement and Tenant's Handbook
- MDH Recharges Policy
- MDH Decant Policy
- MDH Voids Management Policy and Lettable Standard
- MDH Tenant Compensation Policy
- MDH Homes Safety Policy
- MDH Aids and Adaptations Policy
- MDDC Complaints and Feedback Policy

5 Responsibility for Repairs

- 5.1 Tenant Responsibilities - The tenant is responsible for reporting repairs to MDH and must allow access to their home for the repair work and associated inspections to be carried out. The tenant is responsible for:
- a) Minor repairs and decorating inside the Property.
 - b) Repairing or renewing any improvements that the tenant has carried out, including associated items. Unless the work is in the nature of minor repairs the tenant must ask MDH for consent in writing to carry out any such works
 - c) The Tenant's responsibilities are as set out in the Tenancy Agreement and the Tenants' Handbook.
- 5.2 The tenant is responsible for allowing access for essential maintenance visits and surveys to support the repairs team. These include the annual gas or heating check, electrical installation condition check, stock condition survey to undertake an assessment of the property's key components so that future works can be programmed and asbestos surveys to ensure that MDH can work safely in a tenant's home. Tenants may be recharged if they unreasonably refuse or fail to allow access when suitable notice has been given for a statutory visit. Please refer to the [MDH Recharges](#) Policy for further details.
- 5.3 MDH's obligations are to:
- a) Keep in repair the structure and exterior of the Property. This includes the drains, external pipes, gutters and external windows.
 - b) Keep in repair and proper working order the installations in the Property for the supply of water, gas and electricity and for sanitation. This includes the basins, sinks, baths and sanitary conveniences.
 - c) Keep in repair and proper working order the installations in the Property for space heating and heating water
- (Further details are set out in the Tenancy Agreement and Tenants' Handbook.)
- 5.4 The obligation to repair carries with it an obligation on MDH to make good or redecorate any damage caused in the course of the repair.
- 5.5 MDH must carry out repairs within a reasonable period of time once it has been notified of the problem. There is no statutory definition of reasonable time. Relevant factors might include:
- The extent of the disrepair
 - Availability of replacement parts
 - Whether the tenant is living in the property

- 5.6 Any temporary measures MDH has put in place might affect what is considered a reasonable time to complete repairs. For example, a temporary door to replace one that was broken, or space heaters where a boiler is not working.
- 5.7 MDH must carry out the repairs at its own cost and is not permitted to charge the tenant for the cost of the repairs or to recover the costs through a service charge.
- 5.8 MDH is not obliged to carry out any works or repairs that are needed due to the tenant not using the property in a tenant-like manner.
- 5.9 MDH is not obliged to keep in repair or maintain anything that the tenant is entitled to remove.
- 5.10 MDH must also ensure that the Property:
- a) Is fit for human habitation at the time the tenancy is granted or created or, if later, at the beginning of the term of the tenancy.
 - b) Will remain fit for human habitation during the term of the tenancy.
- 5.11 MDH fulfils its repairing responsibilities through a combination of the following type of repairs:
- Responsive Repairs
 - Planned improvements.
 - Cyclical maintenance, which includes decorating and servicing and inspection of gas and electrical installations.
 - Re-chargeable repairs
 - Repairs to Empty (Void) Properties
 - The Right to Repair
 - Adaptations
- 5.12 Responsive repairs will normally replace fixtures and fittings supplied by MDH on a like for like or improved basis or, where this is not possible, MDH will aim to provide the tenant with choices in relation to the replacement. In some cases, for example where stock is obsolete the closest match may vary greatly.

- 5.13 If a component cannot be fully repaired, MDH may make a temporary repair and arrange for a full planned replacement to follow on and this will be discussed with the tenants. MDH will ensure the substantive repairs are carried out within a reasonable period of time.

6 Responsive Repairs

- 6.1 When a tenant reports a repair MDH will:

- Check whether the repair is MDH's responsibility
- If necessary, arrange for a member of staff to visit the home to look at what needs to be done
- For most repairs except emergencies MDH will make a morning (8am to 1pm) or afternoon (1pm to 4.30pm) appointment for a specific date
- If tenants contact MDH by telephone MDH will generate a unique job number which they can use if they need to contact MDH about the repair again, although tenants can enquire about any job by providing their address and a brief description.
- MDH will contact tenants by their preferred method to arrange and confirm appointment details including telephone, email, text message or by post
- MDH may increase the priority of repairs for older tenants, those with disabilities or vulnerabilities but this will be considered on an individual basis

- 6.2 When work is scheduled to be completed MDH will:

- Tell the tenant if they need to move or protect furniture, or if any floor covering needs to be removed.
- Not work in a home where the only person (s) at home is under 16 years old
- Request that pets and animals are placed in a separate room
- Request that tenants provide a smoke-free environment for MDH's repair workers

7 Response Times

- 7.1 When a repair is reported MDH will discuss the nature of the repair and tell the tenant what response time category it has been placed in. The response time are measured from the date that the repair is reported.

- 7.2 Emergency repairs - MDH will respond within 4 hours or 1 working day, depending on the urgency. For repairs to remove immediate danger to people, avoid flooding or major damage to the property, make the property secure, or restore total loss of heating in winter (31st Oct-1st May)MDH will complete the repair at the time, if possible . If this is not possible, MDH will make the situation safe and carry out any follow up work as an urgent or routine repair. Examples could include: Gas leaks. Serious internal water leak. Loss of water supply to all parts of the home. Dangerous electrics (electric shock, bare wires) and unsafe electrical sockets or fittings, total loss of electricity supply, blocked drain (when backing up into property), blocked toilet or toilet not flushing (when no other toilet in the home), blocked flue to open fire or boiler, leaking roof (temporary repair), door or window insecure, loss of room or water heating (total or partial) between 31st October and 1st May.

- 7.3 Urgent Repairs will be undertaken within 3 working days for Partial loss of electrical supply, blocked bath, basin or sink, blocked toilet when another toilet in the home can be used), broken or rotten wood floors or stairs, loss of room or water heating (total or partial) between 30th April & 1st November, faulty communal door, stiff or seized tap or valve, broken or loose balustrade or handrail.
- 7.4 Other urgent repairs will be completed within 7 working days for such repairs as work to restore full or partial failure of sanitation, water or electrical supply or heating systems. Also for urgent work to prevent immediate damage to the property, to overcome serious inconvenience to the household or where there is possible health, safety or security risk. Examples could include: Faulty extractor fan in kitchen or bathroom (where there is no openable window), rain coming through the roof, door entry phone not working.
- 7.5 For Routine repairs which are not emergency or urgent - MDH will complete the repair within 35 working days. This is for work where the fault or failure does not cause inconvenience or present a danger to occupants or the public. MDH may extend the timescale for certain repairs, for example if materials or parts need to be ordered.
- 7.6 Repairs and component replacements to external and non-habitable parts of the home, such as coal stores, external WCs, garden WCs, porches, external stores and outhouses will not normally fit within emergency to routine repair timescales, unless there is an imminent risk to health or life. Works will normally be carried out as major, planned or batched planned works. Although such areas may be treated by tenants as part of the home, they are not designed with the same level of protection from damp or weather as the main parts of the home, and are only suitable for storage of non-perishable items.
- 7.7 Planned work. MDH will put certain non-urgent work into 'packages' of work that can be carried out all together in an area. This is more efficient and costs less. This will only be done if the work can be completed in this way within a reasonable time otherwise the works will have to be carried out as responsive repairs and not as planned work
- 7.8 If a repair worker does not come within the response time or keep to a specific morning or afternoon appointment agreed with the tenant MDH ask that tenant contact us immediately. In certain circumstances MDH will make a payment to the tenant for the inconvenience.

8 Exclusions

- 8.1 Misuse / damage – where repairs are required due misuse or damage, tenants may be responsible for arranging for or paying for repairs. In extreme cases, possession may be sought for breach of tenancy agreement.

9 Tenant's Right to Repair

- 9.1 The Right to Repair is part of the Citizen's Charter Scheme. It gives tenants the right to have certain repairs done within set time limits. These are referred to as Qualifying Repairs that could affect the health, safety and security of tenants.
- 9.2 MDH will inform tenants if their repair is a Qualifying Repair.
- 9.3 If MDH do not complete a Qualifying Repair within the time allowed, the tenant has the right to tell MDH to get another contractor to complete the works. If they fail to complete the work within the timeframe tenants may be entitled to compensation.

10 Planned and Cyclical Maintenance

- 10.1 Planned maintenance includes all planned improvement works and planned repairs to the housing stock.
- 10.2 MDH gathers and uses information relating to each property to plan and develop its planned maintenance programmes. Typically, this will include:
 - Information from a periodic stock condition survey
 - Condition of property elements & components
 - Expected component and material lifecycles
 - Information about asbestos present in the property
 - Information about the energy performance of properties
 - Information from the Housing Health and Safety Rating System (HHSRS)
 - Repair history
- 10.3 In developing its annual planned maintenance programme, MDH will consider the current condition of the property and assess this against the component lifecycle and the decency standards as defined by the Department for Levelling Up, Housing & Communities. Consideration will also be given to the impact on other maintenance work streams.
- 10.4 Cyclical maintenance are works that are undertaken at defined time intervals as routine preventative maintenance. The works are undertaken on regular planned cycles for servicing, inspection and testing of equipment, often as required by statute or regulations or to maintain the generation condition of the stock, and particularly the electrical and mechanical installations within the stock. Further detail is contained within the [MDH Homes Safety Policy](#).

11 Stock Condition

- 11.1 MDH holds data on the condition of all the housing stock which informs the timeframes for planned and cyclical maintenance programmes

11.2 Information used to determine the condition of individual properties includes:

- Physical inspections of properties
- Information provided by Officers and Contractors
- Reports received during routine maintenance checks
- Cloned data

12 MDH's Standards

12.1 MDH will respond to repair problems in an efficient and helpful way. Most repairs are carried out by MDH own repair workers but MDH sometimes use specialist contractors. If this happens MDH will tell tenants the name of the contractor.

12.2 MDH's staff will:

- Answer calls promptly
- Be polite, honest and helpful

12.3 Anyone working in tenant's homes will follow certain rules of behaviour:

- Treat tenant's and their household with respect and always behave in a professional way
- Consider any tenant vulnerabilities and make reasonable adjustments if required
- Introduce themselves and show photo identification before entering
- Explain what they are going to do and discuss how this will affect the tenant or their household
- Protect belonging from damage, dust and paint
- Make sure materials and tools do not cause a danger to anyone
- Keep tenants informed about how the work is progressing
- Clear rubbish from the home at the end of each working day
- Make sure electricity, gas and water are connected at the end of the day
- Be dressed appropriately for the type of work they do

12.4 MDH will carry out regular checks to make sure MDH provide a good standard of service by selecting a number of completed repairs on a random basis. MDH will also contact tenants by telephone, text, email or letter to find out what they thought about the service. MDH will inspect completed jobs at random for the standard of workmanship either by telephoning the tenant or visiting the home to look at the repair.

13 Complaints

13.1 We will try to get things right the first time and when we do, we would love people to let us know. It's great for us to receive positive comments or feedback, so if people wish to complement our staff for doing a great job, we would love to hear from them.

13.2 If things do go wrong the Council is committed to:

- Dealing with complaints and comments quickly and effectively; and
- Using complaints, comments and compliments to review and improve our services

13.3 When tenants contact us to tell us they are dissatisfied with the service we have provided, we will offer them the choice to have an informal conversation to see if we can put things right quickly, without the need for a formal investigation.

13.4 The Housing Ombudsman Service advise that a complaint must be defined as:

'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents'.

13.5 Where a tenant considers that the council has given a poor service or has got something wrong, they may tell a member of staff in the first instance. This does not need to be treated as a formal complaint (unless the complainant asks us to do so) and may be resolved 'there and then' by way of an apology or plan of action. Any comments provided will be used to take appropriate action, or give information.

13.6 If a tenant does not want to do this or is unhappy with the response, they may make a formal complaint, which can escalate from stage 1 or stage 2 if they are still not satisfied with the response. Having been through stages 1 and 2 and they are still not satisfied, the tenant may contact the Housing Ombudsman Service.

13.7 MDH's complaints procedure is detailed on Mid Devon District Council website: [Feedback and Complaints](#)

14 Equality Impact Assessments

- 14.1 MDH complete an equality impact assessment each time we develop or review a policy, procedure or service. The assessment is to help us make sure our decision making is fair and does not present any barriers or disadvantage to customers from any protected group (including disability) under the Equality Act 2010.

Equality Impact Assessment

Purpose of the Equality Impact Assessment process:

The Equality Act (2010) introduced the [Public Sector Equality Duty](#) (PSED) requiring public bodies to give due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Consideration must be given to the protected characteristics covered by the Equality Act (2010). Assessments should consider relevant evidence relating to persons with protected characteristics in relation to assessments of potential impact.

The purpose of an Equality Impact Assessment (EIA) is to ensure that policies, functions, plans or decisions (hereafter referred to as 'policy/ decision') do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised. An EIA is not required for a decision in relation to an individual.

Screening is a short exercise to determine whether a policy/ decision is relevant to equalities, and if so, whether a full EIA should be conducted.

Section 1: Equality Impact Assessment Screening

Title and description of the policy/ decision:	MDH Repairs and Maintenance Policy		
Job title of the person(s) undertaking the assessment:	Policy Officer		
Council service:	Housing		
Date of assessment:	01.08.2024		
What are the aims, purposes, objectives and proposed outcomes of the policy/ decision?			
<p>The aim of this policy is to ensure that MDH's repairs and maintenance service meet all of our landlord obligations with regard to legal and contractual requirements and to explain tenant responsibilities in relation to the Tenancy Agreement.</p> <p>The objective is to clarify what tenants can expect of MDH in relation to servicing, repairs and planned works.</p>			
Who may be affected by the policy/ decision?	All MDH Tenants		
How have stakeholders been involved in the development of the policy/ decision? E.g. a consultation exercise	<p>Consultation exercise was undertaken between—which included:</p> <ul style="list-style-type: none"> • Tenants • Members of the Homes PDG 		
Will there be scope for prompt, independent reviews and appeals against decisions arising from the policy/ decision?	MDH reviews its practices as lessons learned when dealing with complaints raised by tenants		
To which part(s) of the Public Sector Equality Duties is the policy/ decision relevant:			
	Yes	No	Details
1. Eliminate unlawful discrimination	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Policy does not discriminate against those who are older, have a disability or are vulnerable
2. Advance equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	
3. Foster good relations between different groups	<input type="checkbox"/>	<input type="checkbox"/>	

Which of the protected characteristics is the policy/ decision relevant to?

Tick and briefly describe any likely equalities impact (positive, negative, or neutral)

Characteristic	Positive	Negative	Neutral	Comments
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	We may increase the priority of repairs for older tenants, those with disabilities or vulnerabilities but this will be

Characteristic	Positive	Negative	Neutral	Comments
				considered on an individual basis
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	We may increase the priority of repairs for older tenants, those with disabilities or vulnerabilities but this will be considered on an individual basis
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Pregnancy/ maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Marriage and Civil partnership*	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*Applies only to Employment and the duty to give regard to the elimination of discrimination.

Decision by Corporate Manager to recommend this policy/ decision for an Equality Impact Assessment?

Yes/ No

If the answer is “Yes”, please continue to the Section 2 and complete the Equality Impact Assessment. If the answer is “No”, please give a brief reason here.

EIA Screening Complete

Section 2: Equality Impact Assessment

Evidence and Consultation

What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy/ decision? E.g. consultations, national or local data and/or research, complaints or customer feedback. Please identify any gaps in the available information that might make it difficult to form an opinion about the effect of the policy on different groups.

MDH has a collection of housing related policies. The use of these helps to ensure that service delivery is consistent and fair. These are currently being reviewed with the aim of aligning them more closely with the Regulatory Standards.

Furthermore, there is a regulatory requirement for registered providers of social housing to tailor their services to meet the needs of tenants. MDH collects data on the diversity of tenants and endeavours to tailor services to meet the needs of all tenants and to enable compliance to be monitored.

MDH records details of all vulnerable tenants in able to support their needs. This includes making reasonable adjustments in dealing with vulnerable tenants so that they are comfortable when we interact with them.

When repairs or maintenance are required MDH ensures that the tenant is communicated to by their preferred channel and that they understand the importance of allowing access to their home to complete the check.

Whilst officers and contractors attend homes to specifically carry out repairs or maintenance they will check any tenants observed who appear vulnerable or if there are safeguarding concerns which will be reported to the Neighbourhood Officer. The Neighbourhood Officer will then contact the tenant to establish if they need additional support to be able to sustain their tenancies.

Please complete this table for all the Protected Characteristics. If you have identified any negative impacts you will need to consider how these can be justified or where possible mitigated either to reduce or remove them. (Please add rows where needed)

Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
Sex			
No Impacts/Issues or opportunities identified			
Age			
Older tenants may be adversely affected when a repairs is required as they may not be able to use alternative facilities	We may increase the priority of repairs for older tenants, those with disabilities or vulnerabilities but this will be considered on an individual basis	Repairs and Maintenance Manager	That target time for completion of repairs take into consideration the age &/or vulnerability of the tenant
Disability			
As above			
Religion or Belief			
No Impacts/Issues or opportunities identified			
Race			
No Impacts/Issues or opportunities identified			
Sexual Orientation			

No Impacts/Issues or opportunities identified			
Gender Reassignment			
No Impacts/Issues or opportunities identified			
Pregnancy/ maternity			
No Impacts/Issues or opportunities identified			
Marriage and Civil partnership (Applies only to Employment and the duty to give regard to the elimination of discrimination)			
Not Applicable			

Please provide details of arrangements to monitor and review the policy/ decision and any mitigating actions or actions to promote equality:

MDH will review this Policy every 10 years and as required to address legislative, regulatory, best practice or operational issues. However the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations. There were no mitigating actions to be taken to promote equality.

Please state where the EIA will be published (e.g. on the Mid Devon District Council website):

Mid Devon Housing Website

=====

Equality Impact Assessment Sign off

For completion by Corporate Manager

Are you prepared to agree and sign off the EIA?

Yes **No**

If "No", provide details of why and next steps:

Name: Simon Newcombe

Job Title: Head of Housing and Health

Date: 21 August 2024

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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



October 2024

The Forward Plan containing key Decisions is published 28 days prior to each Cabinet meeting

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)
October					
Leisure Pricing Strategy (Part II) To receive and approve the revised leisure Pricing Strategy.	Service Delivery & Continuous Improvement Policy Development Group Cabinet	23 Sep 2024 15 Oct 2024	Dean Emery, Head of Revenues, Benefits & Leisure	Cabinet Member for Service Delivery and Continuous Improvement	Fully exempt
2024/2025 Medium Term Financial Plan (MTFP)	Cabinet	15 Oct 2024	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Streetscene Depot - Additional Lease To receive a report regarding an additional lease for the Streetscene Depot.	Cabinet	15 Oct 2024	Matthew Page, Head of People, Performance & Waste	Cabinet Member for Service Delivery and Continuous Improvement	Fully exempt

Agenda Item 13.

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)
Blackdown Hills National Landscape Management Plan	Cabinet	15 Oct 2024	Tristan Peat, Forward Planning Team Leader	Cabinet Member for Planning and Economic Regeneration	Open
Hoarding Policy To receive the revised Hoarding Policy.	Homes Policy Development Group Cabinet	10 Sep 2024 15 Oct 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Repairs and Maintenance Policy (New) To receive the new Repairs and Maintenance Policy.	Homes Policy Development Group Cabinet Council	10 Sep 2024 15 Oct 2024 30 Oct 2024	Mike Lowman, Building Services Operations Manager	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
MDH Asbestos Management Plan To receive the HRA Asset Management Strategy	Homes Policy Development Group Cabinet	10 Sep 2024 15 Oct 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	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)
November					
Mid Devon Gypsy and Traveller Accommodation Assessment	Cabinet	10 Dec 2024	Tristan Peat, Forward Planning Team Leader	Cabinet Member for Planning and Economic Regeneration	Open
Tiverton EUE, Area B Masterplan	Cabinet	12 Nov 2024	Christie McCombe, Area Planning Officer	Cabinet Member for Planning and Economic Regeneration	Open
Leisure Management System Update	Cabinet	12 Nov 2024	Haley Walker, Leisure Business Manager	Cabinet Member for Quality of Living, Equalities and Public Health	Open
Car Parking Spaces in Halberton	Cabinet	12 Nov 2024		Cabinet Member for Housing, Assets and Property and Deputy Leader	Part exempt
Cullompton Town Centre Relief Road	Cabinet	12 Nov 2024	Adrian Welsh, Strategic Manager for Growth, Economy and Delivery	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)
S106 Governance	Cabinet	12 Nov 2024		Cabinet Member for Governance, Finance and Risk	Open
Grand Western Canal Conservation Area Appraisal and Management Plan	Cabinet	12 Nov 2024	Tristan Peat, Forward Planning Team Leader	Cabinet Member for Planning and Economic Regeneration	Open
	Cabinet	10 Dec 2024			
	Council	18 Dec 2024			
2024/2025 Medium Term Financial Plan (MTFP)	Cabinet	12 Nov 2024	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
	Homes Policy Development Group	19 Nov 2024			
	Planning, Environment & Sustainability Policy Development Group	26 Nov 2024			
	Economy & Assets Policy Development Group	28 Nov 2024			
The Statutory Duty to Conserve and Enhance Biodiversity	Cabinet	12 Nov 2024	Jason Ball, Climate and Sustainability Specialist	Cabinet Member for Environment and Climate Change	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)
December					
Tenant Representation Report To receive a report regarding co-opted Tenant Representation on the Homes Policy Development Group.	Homes Policy Development Group Cabinet Council	19 Nov 2024 10 Dec 2024 18 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Devon Housing Commission Report To receive the Devon Housing Commission Report.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Variation to Standard Tenancy Agreement That the Homes PDG recommends to Cabinet that the procedure for the variation of tenancy conditions in line with the Housing Act 1985 (sections 102 & 103) commence.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Planning Enforcement-Enforcement Policy Update	Scrutiny Committee Cabinet	25 Nov 2024 10 Dec 2024	Angharad Williams, Development Management Manager	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)
2024/2025 Medium Term Financial Plan (MTFP)	Service Delivery & Continuous Improvement Policy Development Group Community, People & Equalities Policy Development Group Cabinet	2 Dec 2024 3 Dec 2024 10 Dec 2024	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
HRA Asset Management Strategy To receive the updated HRA Assets Management Strategy.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Tenancy Management Policy To receive the revised Tenancy Management Policy.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Infrastructure Funding Statement- Infrastructure List	Planning, Environment & Sustainability Policy Development Group Cabinet	26 Nov 2024 10 Dec 2024	Elaine Barry, Planning Obligations Monitoring Officer	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)
Destination Management Plan for Mid Devon	Economy & Assets Policy Development Group Cabinet	6 Mar 2025 1 Apr 2025	Adrian Welsh, Strategic Manager for Growth, Economy and Delivery	Cabinet Member for Planning and Economic Regeneration	Open
Economic Strategy 2024 - 2029	Economy & Assets Policy Development Group Cabinet	6 Mar 2025 1 Apr 2025	Adrian Welsh, Strategic Manager for Growth, Economy and Delivery	Cabinet Member for Planning and Economic Regeneration	Open
Climate Strategy Action Plan To consider the Climate Strategy Action Plan	Planning, Environment & Sustainability Policy Development Group Cabinet	26 Nov 2024 10 Dec 2024	Jason Ball, Climate and Sustainability Specialist	Cabinet Member for Environment and Climate Change	Open
Tenant Involvement Strategy To receive the revised Tenant Involvement Strategy.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	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)
National Assistance Burial Procedure To consider the National Assistance Burial Procedure	Service Delivery & Continuous Improvement Policy Development Group Cabinet	2 Dec 2024 10 Dec 2024		Cabinet Member for Service Delivery and Continuous Improvement	Open
Tenant Compensation Policy To receive the revised Tenant Compensation Policy.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Service Standards To receive the Service Standards for Housing.	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Housing Strategy To receive the revised Housing Strategy.	Homes Policy Development Group Cabinet	18 Mar 2025 1 Apr 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Corporate Performance Q2 including Dashboard; Corporate Risk Q2;	Cabinet	10 Dec 2024	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	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)
Phoenix House Accommodation Opportunities	Cabinet		Andrew Jarrett, Deputy Chief Executive (S151)	Cabinet Member for Service Delivery and Continuous Improvement	Open
Tenancy Strategy To receive the revised Tenancy Strategy	Homes Policy Development Group Cabinet	19 Nov 2024 10 Dec 2024	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
January 2025					
CCTV Policy To receive the updated CCTV Policy	Community, People & Equalities Policy Development Group Cabinet	3 Dec 2024 7 Jan 2025		Cabinet Member for Quality of Living, Equalities and Public Health	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)
Willand Neighbourhood Plan	Planning, Environment & Sustainability Policy Development Group	26 Nov 2024	Tristan Peat, Forward Planning Team Leader	Cabinet Member for Planning and Economic Regeneration	Open
	Cabinet	7 Jan 2025			
	Planning, Environment & Sustainability Policy Development Group	11 Mar 2025			
	Cabinet	1 Apr 2025			
	Council	23 Apr 2025			
Blackdown Hills National Landscape Management Plan	Cabinet	4 Mar 2025	Tristan Peat, Forward Planning Team Leader	Cabinet Member for Planning and Economic Regeneration	
Green Enterprise Grants	Cabinet	7 Jan 2025	Jason Ball, Climate and Sustainability Specialist	Cabinet Member for Environment and Climate Change	
2024/2025 Medium Term Financial Plan (MTFP)	Cabinet	7 Jan 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	

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)
<p>Future Waste & Recycling Options To receive a report regarding fully investigated future Waste & Recycling Options as identified at the previous PDG meeting.</p>	<p>Service Delivery & Continuous Improvement Policy Development Group Cabinet</p>	<p>2 Dec 2024 7 Jan 2025</p>	<p>Matthew Page, Head of People, Performance & Waste</p>	<p>Cabinet Member for Service Delivery and Continuous Improvement</p>	<p>Open</p>
<p>National Assistance Burial Procedure To receive and approve the updated National Assistance Burial Procedure.</p>	<p>Service Delivery & Continuous Improvement Policy Development Group Cabinet</p>	<p>2 Dec 2024 7 Jan 2025</p>	<p>Steve Densham, Land Management Officer</p>	<p>Cabinet Member for Environment and Climate Change</p>	<p>Open</p>
<p>Air Quality Action Plan To consider the report</p>	<p>Community, People & Equalities Policy Development Group Cabinet</p>	<p>2 Dec 2024 7 Jan 2025</p>	<p>Simon Newcombe, Head of Housing & Health Jason Ball, Climate and Sustainability Specialist</p>	<p>Cabinet Member for Planning and Economic Regeneration Cabinet Member for People, Development and Deputy Leader</p>	<p>Open</p>

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)
February 2025					
2024/2025 Medium Term Financial Plan (MTFP)	Cabinet Council	4 Feb 2025 19 Feb 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	
Team Devon Joint Committee	Cabinet Council	4 Feb 2025 19 Feb 2025		Leader of the Council	Open
Regulation of Investigatory Powers	Community, People & Equalities Policy Development Group Scrutiny Committee Cabinet	3 Dec 2024 13 Jan 2025 4 Feb 2025	Maria De Leiburne, Director of Legal, People & Governance (Monitoring Officer)	Cabinet Member for People, Development and Deputy Leader	Open
March 2025					
Corporate Anti Social Behaviour Policy	Community, People & Equalities Policy Development Group Cabinet	25 Mar 2025 1 Apr 2025		Cabinet Member for Quality of Living, Equalities and Public Health	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)
Mid Devon Draft Policies and Site Options	Cabinet	4 Mar 2025	Tristan Peat, Forward Planning Team Leader		Open
Local Development Scheme	Planning, Environment & Sustainability Policy Development Group	11 Mar 2025	Tristan Peat, Forward Planning Team Leader	Cabinet Member for Planning and Economic Regeneration	
Tenancy Options Waste Services – Carlu Close To consider the future of the tenancy at Carlu Close	Cabinet	28 Mar 2025	Andrew Busby, Corporate Manager for Property, Leisure and Climate Change	Cabinet Member for Environment and Climate Change	Open
April 2025					
Asset Management Plan To receive the revised Asset Management Plan.	Economy & Assets Policy Development Group	6 Mar 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
	Cabinet	1 Apr 2025			

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)
Right to Buy Policy (New) To receive the new Right to Buy Policy.	Homes Policy Development Group Cabinet Council	18 Mar 2025 1 Apr 2025 23 Apr 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Corporate Recovery Policy To receive the updated Corporate Recovery Policy.	Audit Committee Cabinet	25 Mar 2025 1 Apr 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Community Safety Partnership Policy To consider the report	Community, People & Equalities Policy Development Group Cabinet	25 Mar 2025 1 Apr 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Quality of Living, Equalities and Public Health	Open
Single Equalities Policy and Equality Objective	Community, People & Equalities Policy Development Group Cabinet	25 Mar 2025 1 Apr 2025	Matthew Page, Head of People, Performance & Waste	Cabinet Member for Quality of Living, Equalities and Public Health Cabinet Member for People, Development and Deputy Leader	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)
Safeguarding Children & Adults at Risk Policy	Community, People & Equalities Policy Development Group Cabinet	25 Mar 2025 1 Apr 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Quality of Living, Equalities and Public Health Cabinet Member for People, Development and Deputy Leader	Open
Data Policy (new) for MDH To receive the new Data Policy for Mid Devon Housing	Homes Policy Development Group Cabinet Council	18 Mar 2025 1 Apr 2025 23 Apr 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Safeguarding Policy (new for MDH) To receive the new Safeguarding Policy for Mid Devon Housing	Homes Policy Development Group Cabinet Council	18 Mar 2025 1 Apr 2025 23 Apr 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open

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